GG022 WHISTLEBLOWER POLICY

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<th>Policy number</th>
<th>GG022</th>
<th>Version</th>
<th>1</th>
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<tr>
<td>Drafted by</td>
<td>Company Secretary</td>
<td>Approved by</td>
<td>Board</td>
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<tr>
<td>Approved date</td>
<td>July 2020</td>
<td>Review date</td>
<td>July 2022</td>
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NSMHS 2010 Reference Standards 1, 2, 3 and 8

Introduction

From 1 January 2020, some entities in Australia, including companies limited by guarantee, are required to have a whistleblowing policy that complies with the new section 1317AI of the Corporations Act 2001. This requirement applies to GROW, and this Policy will ensure GROW is compliant.

Purpose

This Whistleblower Policy ensures that people can raise concerns regarding situations where they believe that GROW or anybody connected with GROW has acted in a way that constitutes serious wrongdoing, including unethical, illegal, corrupt or other inappropriate conduct, as set out below,

- a) encourage a person to report improper conduct in good faith if they know or have reasonable grounds to suspect such conduct
- b) provide a mechanism to report misconduct or dishonest or illegal activity that has occurred or is suspected within the organisation
- c) enable GROW to deal with reports from whistleblowers in a way that will protect the identity of the whistleblower and provide for secure storage of the information
- d) ensure that any Reportable Conduct is identified and dealt with appropriately
- e) ensure that individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported, and
- f) help to ensure that GROW maintains the highest standards of ethical behaviour and integrity.

Scope

This Policy applies to:

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<th>Employees</th>
<th>Directors</th>
<th>Officers</th>
<th>Contractors</th>
<th>Volunteers</th>
<th>Suppliers</th>
<th>Consultants</th>
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Within this Policy, all these people are represented by the term "Workers".

Although they are under no obligation to do so, any associate, family member or dependant of any person in the above groups of people may also speak up. If they do choose to speak up in line with this Policy, we will extend to them the relevant rights and protections under this Policy.

Principles

- **Higher standard** – If anything in this Policy is inconsistent with any law imposed on GROW, that legal obligation or the "higher standard" will prevail over this Policy.

- **Speak up and report it** – We encourage Workers at GROW to report any concerns in line with our policies and procedures.
The document contains information about a whistleblower policy. It outlines expectations for workers, responsibilities to whistleblowers, and the confidentiality and consent policies. It also describes reportable conduct and what is not reportable conduct. Additionally, it provides instructions on how to report. The document is approved by the board and can be referred to SharePoint for the latest version.
Information required for a protected report

To make a protected report, you must know of or have reasonable grounds to suspect the Reportable Conduct. A report must contain enough information to form a reasonable basis for investigation and include any known details about the events underlying the report, such as the:

- date
- time
- location
- name of the person(s) involved
- possible witnesses to the circumstances, and
- evidence of the events (e.g. documents, emails).

GROW will also protect individuals who have made a report in connection with GROW:

- a) To the Australian Securities and Investments Commission (ASIC) or the Australian Prudential Regulation Authority (APRA) or another Commonwealth regulatory body prescribed in legislation
- b) To a legal practitioner to obtain legal advice or legal representation about whistleblower protections, or
- c) That qualifies as an emergency or public interest disclosure under the Corporations Act 2001 (Cth). You must understand the criteria for making a public interest or emergency disclosure, and you may wish to consult an independent legal adviser before making a public interest or emergency disclosure.

While GROW encourages you to identify yourself to the nominated role, you may opt to report your concerns anonymously such as by adopting a pseudonym.

Protection

If you have reasonable grounds to suspect Reportable Conduct, GROW will support and protect you and anyone else assisting in the investigation. This protection applies regardless of whether any concerns raised in a report are found to be accurate, provided that you are acting honestly and ethically and make the report on reasonable grounds.

GROW will not tolerate any detriment inflicted on you because you or somebody else has made, or might make, a report of Reportable Conduct. Examples of a detriment include:

- retaliation, dismissal, suspension, demotion, or termination of your role
- bullying, harassment, threats or intimidation
- discrimination, subject to current or future bias, or derogatory treatment
- harm or injury
- damage or threats to your property, business, financial position or reputation
- revealing your identity as a Whistleblower without your consent or contrary to law, or
- threatening to carry out any of the above actions.

If you believe you have suffered a detriment in violation of this Policy, report this immediately to the NCEO or another nominated officer under this Policy.

You may also be entitled to the following legal protections for making a report:

- protection from civil, criminal or administrative legal action
- protection from having to give evidence in legal proceedings; and/or
- compensation or another legal remedy.

False reports or disclosures
Protected Disclosures must be made on reasonable grounds. Anyone who knowingly makes a false report/disclosure of Reportable Conduct may be subject to disciplinary action, including dismissal.

The disciplinary action will depend on the severity, nature and circumstance of the false disclosure.

**Investigating a disclosure**

Upon receiving a Protected Disclosure, within a reasonable time frame, GROW will endeavour to assess the disclosure to determine whether:
- It qualifies for protection, and
- A formal, in-depth investigation is required.

GROW will endeavour to provide the discloser with regular updates. GROW will handle and investigate Protected Disclosures following the Whistleblowing Procedure below.

**Monitoring and assurance**

- This Policy will be distributed and available to all Workers via SharePoint in Policies and Procedures.
- This Policy will be available on the GROW Website
- To ensure effective protection under the Policy, the CEO will monitor and review this Policy biannually.

**Related Documents**

GG022b Whistleblowing Procedure

**Legislation & Industrial Instruments**

- Corporations Act 2001 (Cth)
- Fair Work Act 2009 (Cth)
- Fair Work Regulations 2009 (Cth)
- Insurance Act 1973
- Life Insurance Act 1995
- Public Interest Disclosure Act 2013
- Superannuation Industry (Supervision) Act 1993
- Taxation Administration Act 1953.