Policy

Subject Description:	Whistleblower
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Pages:	Five

A whistleblower is a person who provides information about misconduct or wrongdoing within a business with the hope of stopping it.

Stockwell International believes it is important for employees to feel comfortable reporting misconduct they see in the workplace. We believe it is important that we hold ourselves to high standards of ethical behaviour and that our clients and community have trust in the way we do business.

This policy aims to protect anyone who comes forward with any information about wrongdoing in the workplace and will take all steps to ensure that whistleblowers remain anonymous. Stockwell International will **never** take any disciplinary action against anyone reporting wrongdoing in the workplace. We wish to do this to encourage employees to make disclosures and not feel that they may be disadvantaged as a result. Whistleblowers will not be disciplined if their disclosures turn out to be incorrect upon investigation.

This policy will also detail the processes that Stockwell International has in place to ensure that whistleblowers remain anonymous and protected as required by law.

Scope

This policy applies to all employees, clients and their employees and relatives of clients and employees. This policy shall also apply to all members of Senior Management and shareholders in the business.

Whistleblowing

Whistleblowing allows employees to be able to report concerns they see in the workplace without fear of being punished for it. By coming forward and making disclosures, you can help to make the workplace a fairer, safer and integral place by bringing accountability to those who are abusing their positions.

The Corporations Act 2001 (Cth) makes it illegal for a company to identify the person who made a disclosure. This means that anyone you make a disclosure to is not allowed to identify you to anyone throughout the investigation or disciplinary process. Any reference to a whistleblower within Stockwell's documentation must refer to them as 'the discloser' and should remove any

detail that could identify them by their job position, department within the company or any other personal attributes.

Who can report?

Any employee of Stockwell International is empowered to make a disclosure if they see any wrongdoing. It is not only Stockwell International employees that can make a Whistleblowing disclosure. The following people are legally protected when making a disclosure:

- Employees of Stockwell International
- Clients of Stockwell International and their employees
- An employee who supplies goods and services to Stockwell International, such as contractors
- An individual who is related by family or marriage to the director
- Trustees of Stockwell International
- Relatives of employees (including children)

What can whistleblowers disclose?

Misconduct refers to people within the business who abuse their power for their own personal benefit or for the benefit of others. This includes anyone who you believe to be acting dishonestly, are failing to act fairly or misusing information gained through their employment for personal gain. You can make a disclosure if you believe that anyone in the business is abusing their position. This includes, but is not limited to:

Insider trading	Failure to keep accurate financial records	Falsification of accounts
Failure of a director to act with the care that is reasonable	Act in the best interests of the corporation and its employees	Failure of a director to give notice of any personal interest in the matters of the company

Corrupt conduct is also reportable. This involves any employee acting dishonestly and not fulfilling their official duties. This may include employees failing to report criminal conduct for financial gain, not disclosing financial conflicts of interest, accepting a financial bribe for the favourable treatment of a person.

However, not all workplace concerns are whistleblowing disclosures. Workplace conflicts and WH&S issues that do not involve abuse of power are not Whistleblowing and should be

discussed with Human Resources. Harassment and bullying may be considered a whistleblowing disclosure if it is serious enough to be considered as acting unfairly.

If you are unsure about any conduct in the workplace by employees, managers or directors, please discuss these concerns with the Director of Human Resources and be certain that your disclosure will be kept confidential.

How can I make a disclosure?

Whistleblowing disclosures can be made directly to the Director of Human Resources, Nicole McLean either in person or by email at nmclean@stockwells.com.au.

If you wish to keep your identity entirely anonymous, please fill out the Employee Grievance Form. A copy of this form is attached at the end of this policy. You are not required to fill out your name, position or include any details that could identify you. This form can be placed on your managers/Director of Human Resources' desk and will be investigated without knowledge that you disclosed the matter.

You will not be penalised if any of the information in this disclosure is incorrect upon investigation of wrongdoing.

You may also speak to a member of the Compliance Team before deciding whether to make a disclosure.

Protecting whistleblower identity

In Stockwell International documentation, no identifying characteristics or information may be used when investigating or punishing wrongdoing. All references to those who have disclosed information must refer to them as 'the discloser' and no references to their position, department or job responsibilities can be mentioned in this documentation. Gender-neutral language will be used to reduce the risk that your identity is identifiable.

These protections will also apply to any verbal conversations.

As per our responsibility under the law, Stockwell International may be required to disclose Whistleblower identity when disclosures are made to the Australian Securities and Investments Commission (ASIC), the Australian Federal Police and the Commissioner of Taxation in the event of tax related fraud. Stockwell International may also disclose whistleblower identity to a lawyer for the purpose of gaining advice about Whistleblower laws.

How are whistleblower reports investigated?

Whistleblower reports will always be investigated initially to assess appropriate measures to be taken. It will be decided whether this report is able to be investigated internally or whether external support is needed.

If you have identified yourself when making the disclosure, the Director of Human Resources will contact you within three days to check on your wellbeing. They will also engage with you to see what measures for support can be made.

During the investigation process, you will be provided with status updates with respect to privacy for those being investigated. An investigation will be conducted in a timely, fair and objective manner. Once the investigation is complete, the Whistleblower will be contacted to ensure that their concerns have been addressed.

Zero tolerance for detrimental conduct

Stockwell International will never demote, dismiss, intimidate or take disciplinary action against you for making a disclosure. If you believe that any action has been taken against you for making a disclosure, please report this to the Director of Human Resources.

We will also make sure that only necessary individuals involved in the investigation and disciplinary proceedings have knowledge of the allegations. This reduces the possibility for adverse action taken against whistleblowers.

What happens if I am the subject of a Whistleblower report?

If you are the subject of a Whistleblower report you will be notified of the allegations made against you and will be given a fair investigation.

Availability of this policy to employees

This policy will be made available to employees on the Stockwell Intranet in the Integrated Management System (IMS). This will be in the Company Policy tab of the IMS.

For staff that do not have access to a work computer, this policy will be available on all safety boards. All employees will therefore have access to the Employee Grievance Form that can be torn off from the back pages, filled in and handed into appropriate persons.

Signed: _____ Date: _____/_____/_____

David Stockwell (CEO)

Employee Grievance Form

This form is used to formally raise and document a workplace grievance. All grievances will be handled confidentially, fairly, and in accordance with company policy.

Employee Information

(If you are filling this form out as part of a Whistleblowing Disclosure, you are not required to fill in this section)

Employee Name:	
Position:	
Department:	
Manager's Name:	
Date Grievance Lodged:	

Grievance Details

Nature of Grievance
(Please select the option(s) that best apply)

☐ Work allocation / workload

☐ Behaviour of a colleague

☐ Behaviour of a manager / supervisor

☐ Bullying or harassment

☐ Discrimination

☐ Workplace health & safety

☐ Policy or procedure concern

☐ Whistleblowing

☐ Other (please specify): _____

Description of Grievance

Please provide details of your grievance, including relevant dates, times, locations, and the names of any people involved.

Steps Taken to Date (if any)

Have you raised this matter previously or attempted to resolve it informally?
☐ Yes ☐ No

If yes, please outline what action was taken and the outcome.

Desired Outcome

What resolution or outcome are you seeking?

Supporting Documents / Evidence

Please list any supporting documents or evidence attached (if applicable).

Acknowledgement

I confirm that the information provided in this grievance is true and correct to the best of my knowledge.

Employee's Signature: _____

Date: ___ / ___ / ___

For Office Use Only

Received By:	
Date Received:	
Action Plan / Initial Response	