

Governance & Management

CGAM.PO.03 Whistleblower Policy

Table of contents

Purpose	2
Policy	3
Circumstances where whistleblower protections apply	3
Who can make a disclosure and be eligible for whistleblowing protections? (Who is an eligible whistleblower)?	3
Types of disclosures that qualify for whistleblower protection	4
Disclosures that do not qualify for whistleblower protections	5
Who to make a disclosure to	5
How to make a disclosure	6
Anonymity	6
Confidentiality protections	6
Protection from detriment	7
Investigation of disclosures	8
Fair treatment of individuals involved in disclosures	8
More information	9
Availability of this policy and training	9
Reporting to the Board	9
Policy review	10
Breach of this Policy	10
Roles and responsibilities	10
Definitions	11
Related documents	11
Version history	12
Appendix: Protections for whistleblowers provided by the Corporations Act and the Tax Administration Act	13

Purpose

Settlement Services International Limited and its subsidiary entities (**SSi Group**) are committed to the highest standards of conduct and ethical behaviour in our business activities and to promoting and supporting a culture of honest and ethical behaviour, corporate compliance and good corporate governance. This policy aligns with SSI Group's values and aims to ensure SSI Group complies with its obligations in relation to whistleblowers as set out in the *Corporations Act 2001* (Cth) (**Corporations Act**). These obligations are set out in further detail in the Appendix of this policy.

SSi Group's whistleblower process is an important element in detecting corrupt, illegal or other undesirable conduct. SSI Group encourages the reporting of any instances of suspected unethical, illegal, fraudulent or wrongdoing involving SSI Group.

The purpose of this policy is to:

- Encourage and enable eligible SSI Group whistleblowers to raise concerns regarding actual or suspected misconduct or an improper state of affairs or circumstances on a confidential and, if desired, anonymous basis
- Outline how SSI Group will protect eligible SSI Group whistleblowers for raising such concerns
- Document and provide transparency regarding how reported concerns are received and, where appropriate, investigated by SSI Group.

This policy sets out information regarding:

- Circumstances where whistleblower protections apply
- Who can make a disclosure and be eligible for whistleblowing protections
- Types of disclosures that qualify for whistleblower protections
- Who can disclosures be made to
- How to make a disclosure
- Anonymous disclosures
- Confidentiality protections
- Protection from detriment
- Investigation of disclosures
- Fair treatment of individuals involved in disclosures
- Training
- Policy review.

The version of this policy made publicly available may exclude information that is not useful or relevant to external disclosers or that would not be suitable for external publication.

Policy

SSI Group prides itself on having an organisational culture that supports and encourages people to raise concerns about wrongdoing.

SSI Group Board, Executive and Management are committed to:

- Maintaining a workplace free of misconduct and supportive of whistleblowing
- Ensuring disclosures are dealt with appropriately and in a timely manner
- Ensuring individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported.

This policy outlines the protections that are available to eligible whistleblowers including the protections under SSI Group's policy framework and, in the Appendix to this policy, the protections that apply to eligible whistleblowers under the Corporations Act. Disclosures can be anonymous and will still qualify for protection, however, if the Whistleblower is unable to be contacted for further information, please note that it may limit SSI Group's ability to take further action in the matter.

Circumstances where whistleblower protections apply

To qualify for whistleblower protection, each of the following three requirements must be met:

- a) the person who makes the disclosure is an eligible whistleblower (Refer to: Who can make a disclosure and be eligible for whistleblowing protection)
- b) the disclosure is of a type that qualifies for whistleblower protection (Refer to: Types of disclosures which qualify for whistleblower protection), and
- c) the disclosure is made to an Eligible Recipient or another person or entity to whom a disclosure can be made (Refer to: Who can a disclosure be made to).

Who can make a disclosure and be eligible for whistleblowing protections? (Who is an eligible whistleblower)?

Persons who are within the following categories (or formerly were in one of these categories), can make a disclosure about SSI Group and be eligible for whistleblower protections:

- officers including Board Directors and secretaries of SSI Group
- all employees (including Executives and Managers), regardless of whether they are permanent, fixed-term or temporary, full-time or part-time employees
- volunteers, interns, secondees
- contractors (including staff of contractors)
- suppliers (including staff of suppliers)
- consultants

- an associate, as defined in the Corporations Act (including a director or secretary of SSI Group, a person with whom SSI Group acts in concert, or a person with whom SSI Group is or proposed to become formally or informally associated)
- relatives, dependents, spouses (including de facto partners), of any of the above. (Note that in this case the actual discloser will be protected, but not the person they are or were related to – that person would also need to make a disclosure to be entitled to the legal protections).

Even if a person does not fall into one of the above categories, they are still encouraged to raise any concern they have through the channels outlined in this policy. SSI Group will still assess the concern raised and take appropriate steps. While SSI Group may not be able to apply all of the protections set out in this policy to the person in this circumstance, it will look for ways to support all persons who raise a concern.

Types of disclosures that qualify for whistleblower protection

A disclosure qualifies for protection under the Corporations Act if the whistleblower has reasonable grounds to suspect the information concerns misconduct or an improper state of affairs in relation to SSI Group (“disclosable matters”), for example:

- fraud, negligence, default, breach of trust or breach of duty
- criminal conduct (including theft, drug sale/use, violence or threatened violence, and criminal damage against property)
- financial irregularities, including fraudulent financial reporting or accounting practices, money laundering or misappropriation of funds
- offering or accepting a bribe or other corruption
- failure to comply with, or breach of, legal or regulatory requirements
- engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made, or be planning to make, a disclosure
- offences against or contraventions of the *Corporations Act* or the *ASIC Act 2001* (Cth) (for example: dishonest use of director’s position, insider trading, insolvent trading, etc), and offences against any other Commonwealth law that is punishable by imprisonment for a period of 12 months or more
- conduct that represents a danger to the public or the financial system (even if it does not involve a breach of a law)
- serious breach of SSI Group's Code of Conduct or other company policies / handbook
- conduct endangering health and safety or causing damage to the environment
- conduct likely to damage the reputation of SSI Group
- deliberate concealment of any of the above.

Note that a whistleblower can still qualify for protection even if their disclosure turns out to be incorrect. However, deliberate false reporting is serious, and disclosures should only be made if

the concerns are reasonably believed. Where it is found that a person has knowingly made a false report, this may result in disciplinary action.

Disclosures that do not qualify for whistleblower protections

Disclosures concerning personal work-related grievances do not qualify for protection under this policy. A personal work-related grievance is a grievance about any matter in relation to the complainant's current or former employment, having (or tending to have) implications for the complainant personally, but which does not have significant impacts for SSI Group and do not concern any other disclosable matters.

Examples of grievances that may be personal work-related grievances, and consequently do not qualify for protection under this policy, are as follows:

- an interpersonal conflict between the complainant and another staff member
- a decision relating to the engagement, transfer or promotion of the complainant
- a decision relating to the terms and conditions of engagement of the complainant
- a decision to suspend or terminate the engagement of the complainant, or otherwise to discipline the complainant.

Personal work-related grievances should be raised following SSI Group's Grievance Resolution Policy and Procedure.

Sometimes disclosures concerning personal work-related grievances may still qualify for protection, if they also concern misconduct or an improper state of affairs, for example sexual harassment that involves criminal behaviour, if there is a cross-over with a disclosure that is also about a disclosable matter, if there is a suggestion of misconduct beyond the discloser's personal circumstances, or if it is about a person suffering detriment for making a whistleblower disclosure. Any such disclosures should be reported under this policy.

Who to make a disclosure to

SSI Group encourages internal disclosures in the first instance, so that SSI Group can identify and address any wrongdoing as quickly as possible. It is SSI Group's preference that disclosures be made to the following (each an **Eligible Recipient** and together, **Eligible Recipients**):

- SSI Group Executive – Most disclosures, unless they concern another General or Executive Manager, CEO, or Board Director
- CEO – Any disclosure concerning a General or Executive Manager or Board Director
- Chair of the Board – Any disclosure concerning the CEO
- Alternatively, if the whistleblower has a reasonable belief that an Eligible Recipient or the Protected Disclosure Coordinator are not sufficiently impartial, a disclosure may be made to the CEO or the Chair of the Board.

The names of SSI's current Executive (including CEOs) and Board Directors are available on SSI's website at <https://www.ssi.org.au/about-us/leadership-team> and <https://www.ssi.org.au/about-us/board-members>.

How to make a disclosure

Persons may make a disclosure to SSI Group in the following methods:

- in person to an Eligible Recipient
- in writing to an Eligible Recipient addressed to Level 1, 158 Liverpool Road Ashfield NSW 2131, and with the name of the chosen Eligible Recipient (please mark the envelope "Private and Confidential", otherwise confidentiality cannot be guaranteed) N.B. If making a disclosure in writing, SSI Group recommends using the report form provided on SSI's website and intranet
- by telephone to an Eligible Recipient.

SSI Group discourages disclosures being made by email, as other internal staff may have access to mailboxes (e.g. IT staff) and therefore confidentiality cannot be guaranteed.

When making a disclosure, the following information should be included:

- Whether the whistleblower consents to their identity being disclosed to those investigating the matter
- If the whistleblower is disclosing anonymously, how can SSI Group maintain contact with them in order to obtain further information and/or to provide them with updates.

Anonymity

Reports of suspected wrongdoings may be submitted to SSI Group anonymously using the above methods, and still be protected under this policy. A whistleblower can choose to remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised. A whistleblower can also refuse to answer questions that they feel could reveal their identity at any time, including during follow-up conversations.

Anonymous disclosures may limit the practical protections and support that SSI Group is able to offer and it may also limit the ability to investigate the matter. Whistleblowers who wish to remain anonymous should maintain ongoing two-way communication with SSI, so SSI can ask follow-up questions or provide feedback. Pseudonyms may be used if the whistleblower's identity is known to the Eligible Recipient, but they do not wish it to be further disclosed.

Where anonymity has been requested, the whistleblower is also required to maintain confidentiality regarding the matter and to refrain from discussing the matter with any person in order to support the confidentiality of their identity.

Confidentiality protections

SSI Group's priority is to support and protect eligible SSI Group whistleblowers who raise concerns that are reportable under this policy. As part of this, an eligible SSI Group

whistleblower who raises a report under this policy will be afforded the confidentiality protections set out in this policy.

In particular, if a person is an eligible SSI Group whistleblower and they raise a concern that is reportable under this policy, their identity (and any information that SSI Group has because of their report that someone could likely use to identify them) will only be disclosed if:

- they give their consent
- the disclosure is required or allowed by law (for example, disclosure by SSI Group to a lawyer to obtain legal advice about whistleblower protections under law), or
- in the case of information likely to identify them, it is reasonably necessary to disclose the information for the purposes of an investigation, but their identity is not disclosed, and all reasonable steps are taken by SSI Group to prevent someone from identifying them.

Reports received will be treated sensitively and seriously. To maintain confidentiality of a report, SSI Group:

- limits access to information relating to a report
- carefully reviews and potentially de-identifies certain aspects of a report as appropriate, and
- uses tools and platforms that allow reports to be made anonymously.

Consent to the limited sharing within SSI Group of a whistleblower's identity will assist SSI Group to protect and support the whistleblower in relation to their disclosure and facilitate SSI Group in investigating, reporting and taking action arising as a result of their disclosure. Please be aware that if a whistleblower does not consent to the limited sharing within SSI Group of their identity and the information provided by them as needed, this may limit SSI Group's ability to progress the report and to take any action in relation to it.

Protection from detriment

SSI Group is committed to protecting eligible SSI Group whistleblowers from any detriment or threats of detriment against any person because of a report raised under this policy, or because of a belief or suspicion that such a report is proposed to be made. These protections are an essential element of creating an environment in which eligible SSI Group whistleblowers feel safe to raise concerns about reportable conduct.

The following measures and/or mechanisms are examples of ways SSI Group will protect the whistleblower from detrimental acts or omissions:

- Ensuring risk assessments are undertaken after a disclosure is received
- Taking actions to protect a whistleblower from detriment, such as allowing them to work from another location where appropriate
- Training Eligible Recipients on their obligations of confidentiality and protecting staff from detriment
- Providing referrals to support services (such as counselling or other professional or legal services)

- Putting in place strategies to help a whistleblower minimise and manage stress, time or performance impacts or other challenges resulting from disclosure or its investigation.

SSi Group will at all times be able to raise and address with an individual matters that arise in the ordinary course of their employment or contractual relationship with SSi Group (for example, any separate performance or misconduct concerns), or take appropriate action to protect a person from detriment, and this will not amount to reprisal action.

A discloser who is an employee (or contractor) of SSi Group, can also access SSi Group's Employee Assistance Program (contact information available on SSi Group's intranet).

Investigation of disclosures

SSi Group values and will consider all reports and information that is received, but not every matter brought to the organisation's attention requires an action or investigation.

The Protected Disclosure Coordinator will assess each disclosure (based on the information provided by the Eligible Recipient) to determine whether it qualifies for protection, will then determine the nature and scope of any investigation required, the persons within or outside the organisation that should lead the investigation (known as the Investigation Officer), the nature of any technical, financial or legal advice that may be required to support the investigation, and the timeframe for the investigation.

If the Investigation Officer is internal, they must be impartial to line management in the area affected by the wrongdoing disclosure. The investigation will be conducted in an objective and fair manner, and as is reasonable and appropriate having regard to the nature of the disclosure and the circumstances. Where a report is submitted anonymously, SSi Group will conduct the investigation and its enquiries based on the information provided. However, SSi Group acknowledges that anonymity may sometimes prevent the organisation taking the issue further if it is not able to obtain additional information from the source of the disclosure.

Where appropriate to do so, the whistleblower will receive relevant and timely feedback on the progress of the investigation, which may vary on a case by case basis. At the conclusion of the investigation, the whistleblower will typically be informed of the outcome, however there may be circumstances in which this is not appropriate. Any report prepared in relation to an investigation may be provided to a decision-maker in relation to the matter and remains the property of SSi Group. It will not be provided to a whistleblower or any other person to whom a report relates.

The timeframe for an investigation will vary depending on the nature of the report. SSi Group endeavours to complete investigations within 90 days of receipt of a report, however this time period may be exceeded depending on the circumstances of the matter.

Disclosures and investigation material will be stored on secure networks to prevent unauthorised access, separate to People & Culture (SSi Group's Human Resources department) files.

Fair treatment of individuals involved in disclosures

SSi Group will take reasonable steps to protect people who are the subject of a disclosure, and other staff who may be requested to assist in an investigation, from any detriment or reprisal as a consequence of their involvement in that investigation.

Measures and/or mechanisms for ensuring fair treatment of individuals mentioned in a disclosure may include:

- Handling disclosures confidentially
- Assessing each disclosure and determining whether it requires further investigation
- Ensuring investigations are objective, fair and independent and guided by the principles of natural justice and procedure fairness
- Providing appropriate updates on the progress of an investigation
- Ensuring employees are able to access support services.

Any breach of this policy by acts of intimidation, retaliation, etc. will be considered a breach of SSI Group's Code of Conduct and will be dealt with as outlined within that policy.

Where it is found that a person has knowingly made a false report, this will be considered a serious matter and may result in disciplinary action.

More information

For more information on this policy and making protected disclosures, please contact General Manager, Corporate Services.

Availability of this policy and training

This policy is available on SSI Group's internal intranet and website. Training is provided to Eligible Recipients who are designated to receive a disclosure under this policy. This training includes ensuring Eligible Recipients are aware of their confidentiality obligations, and to ensure they are aware of their obligations in relation to no detriments or reprisals towards the whistleblower. All other staff will receive training on this policy via SSI Group's online training portal.

This policy is non-contractual and does not form part of any employment agreements with employees or contract of engagement. This policy does not bind SSI Group and does not create any obligation on the part of SSI Group toward an employee or contractor.

Reporting to the Board

The Risk and Compliance Committee (**RCC**) of the Board of Settlement Services International Limited is periodically updated on SSI Group's whistleblowing program, inclusive of summary information relating to reports, investigations, and results, which are de-identified as required. Reports or investigations concerning material incidents may be reported to the RCC outside of the usual updates. The Board will in turn receive appropriate updates from the RCC. The Board and the RCC at any time can ask about the state of SSI Group's whistleblowing program.

Policy review

This policy will be reviewed and amended periodically to ensure the policy remains relevant, effective and reflects any changes in legislation. Unless otherwise indicated, this policy is current and applicable beyond the next review date.

Breach of this Policy

SSI Group takes any breach of these protections seriously. Where a whistleblower believes a breach has occurred, they should raise a concern with the General Manager Corporate Services.

Roles and responsibilities

Role	Responsibilities
Whistleblower	<p>A whistleblower is:</p> <ul style="list-style-type: none"> encouraged to speak up about any misconduct or improper state of affairs; and expected to provide information to assist any inquiry/investigation of the misconduct or improper state of affairs disclosed.
Eligible Recipient	<p>The Eligible Recipient is the person who receives a whistleblower disclosure of wrongdoing and who must:</p> <ul style="list-style-type: none"> Maintain confidentiality of the whistleblower’s identity and the information that is likely to lead to the identification of a disclosure. The recipient of the disclosure cannot disclose the identity of the whistleblower, even to other Eligible Recipients in the organisation or to those that will investigate, unless they have the consent of the whistleblower, or they have sought advice from the SSI Group’s in-house legal team who has advised them that there is another permissible basis to do so. Assist the whistleblower to access any internal or external support mechanisms as required Notify the Protected Disclosures Coordinator of disclosure allegations subject to the confidentiality requirements referred to above
Protected Disclosure Coordinator	<p>At SSI Group, this refers to the Company Secretary.</p> <p>The role of the Protected Disclosure Coordinator is to receive particulars about all whistleblower events (though not the identity of the whistleblower, unless they have consented) and is responsible for:</p> <ul style="list-style-type: none"> Maintaining confidentiality Safeguarding the interests of the whistleblower in accordance with this policy Receiving and assessing the substance of reports on the basis of sufficient evidence in support of matters raised Determining whether to refer reports for further action

Role	Responsibilities
	<ul style="list-style-type: none"> • Arranging for an inquiry/investigation into the disclosures made by the whistleblower • Maintaining a whistleblower Register for trend analysis and to identify systemic issues requiring attention • Overseeing resolution of the matter • Be satisfied that each disclosure of wrongdoing they received was appropriately inquired into or investigated • Be satisfied that action taken in response to the inquiry/investigation is appropriate to the circumstances • Provide governance oversight over any inquiry/investigation into retaliatory action taken against the whistleblower • Where required ask the Eligible Recipient if the whistleblower gives consent to share their identity with the Investigation Officer
Investigation Officer	<p>The Investigation Officer is independent of the Eligible Recipient and will:</p> <ul style="list-style-type: none"> • Investigate the allegation • Obtain any relevant written evidence • Contact and interview all the relevant parties • Record their findings • Prepare a report outlining their investigation, the findings they have reached and why they have reached those findings • Provide the final investigation report to the Protected Disclosure Coordinator.

Definitions

Term	Definition
SSI Group	<p>Settlement Services International Limited and its subsidiary entities:</p> <ul style="list-style-type: none"> • Access Community Enterprises Limited • Access Community Services Limited • Brisbane Multicultural Arts Centre Limited • Multicultural Centre for Mental Health & Well Being Limited • SSI Legal Pty Ltd.
SSI Group Executive	Members of SSI Group's Executive team who have executive oversight of SSI Group.

Related documents

Related Policies/Procedures

Document code	Document title
CGAM.FM.03.1	Whistleblower Report Form

Document code	Document title
CPAC.PO.01	Code of Conduct Policy
CPAC.PO.04	Conflict of Interest Policy
CRSK.PL.03	Fraud Control Plan
CQA.PO.10	Feedback and Complaint Policy
CQA.PR.10	Feedback and Complaint Procedure
CPAC.PO.05	Grievance Resolution Policy
CPAC.PR.05	Grievance Resolution Procedure

External references

Description
<i>Fair Work Act 2009 (Cth)</i>
<i>Corporations Act 2001 (Cth)</i>
<i>Treasury Laws amendment (Enhancing Whistleblower Protections) Act 2019 (Cth)</i>
<i>Taxation Administration Act 1953 (Cth)</i>
<i>Public Interest Disclosures Act 2013 (Cth), and similar state-based legislation</i>

Version history

Version	Created	Author	Description
1	18 December 2019	GM Client Services & Operations	Approved by Executive for publication Approved by the Board, November 2020
1.1	13 November 2020	GM Client Services & Operations	Minor updates to reflect change in reference to SSI Group Approved by the Board, December 2020
1.2	1 March 2021	GM Client Services & Operations	Minor update clarifying that auditors refers to financial auditors
1.3	25 January 2022	Board Secretariat	QMS Review with minor updates including the removal of Greg Benson and reference to Board Members changed to 'Board Directors'. Approved by the Board, December 2021
	June 2023	Board Secretariat	QMS review with no changes. Approved by the Board, June 2023
2	27 June 2024	Board Secretariat	Reviewed by Legal with major changes throughout to strengthen and clarify the policy and process. Board approved 27 June 2024

Appendix: Protections for whistleblowers provided by the Corporations Act and the Tax Administration Act

Overview

As set out in this policy, SSI Group is committed to protecting whistleblowers who make a report in accordance with this policy. Protections can also arise under the *Corporations Act 2001* (Cth) ("**Corporations Act**") in relation to SSI's Australian operations, which protects whistleblowers where they make a disclosure about a "disclosable matter" to a person specified under the Corporations Act as set out below. Protections can also arise under the *Taxation Administration Act 1953* (Cth) ("**Taxation Administration Act**"). This Appendix sets out more information regarding these protections.

What types of matters are protected under Australian law?

A "disclosable matter" under the Corporations Act will arise where a whistleblower makes a report in circumstances where they have reasonable grounds to suspect that the information concerns misconduct or an improper state of affairs or circumstances in relation to SSI, including, but not limited to, conduct that:

- constitutes an offence against a range of corporate and financial sector legislation specified under the Corporations Act;
- constitutes an offence against any law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more;
- represents a danger to the public or the financial system; or
- is otherwise prescribed by regulation.

In addition, a disclosure may also be protected as a "qualifying disclosure" under the Taxation Administration Act where a report relates to a breach of Australian tax law or tax-related misconduct.

If a whistleblower makes a disclosure to a legal practitioner for the purposes of obtaining legal advice or legal representation, their disclosure will also be protected even if it does not relate to a "disclosable matter".

Disclosable matters specified in this policy which do not amount to a "disclosable matter" under the Corporations Act (or a "qualifying disclosure" under the Taxation Administration Act) will not be protected under those Acts but will be protected in accordance with this policy. Further, protections may be available under other laws for certain other disclosures, including:

- Fair Work Act 2009 (Cth)
- Public Interest Disclosure legislation for disclosures relating to services provided by SSI Group under government contracts (as applicable) (e.g. Public Interest Disclosures Act 2013 (Cth) and Public Interest Disclosures Act 2022 (NSW));

- Work Health and Safety (**WHS**) laws for disclosures relating to WHS issues or concerns (e.g. Work Health and Safety Act 2011 (NSW))

How will I be protected if I raise a concern?

Two key protections inform all aspects of SSI's whistleblower program and are available under Australian law.

Confidentiality: We protect the confidentiality of whistleblowers who raise concerns. We do this by limiting how both your identity and information that is likely to lead to your identification is shared. Your identity will be kept confidential to the fullest extent possible and only shared as permitted by you or by law.

Under the Corporations Act, where a report is made about a "disclosable matter" by a whistleblower to the persons specified in this policy and under the Corporations Act (as set out below), that whistleblower's identity (and information which is likely to identify them) can only be disclosed without their consent, if the disclosure is to:

- the Australian Securities and Investments Commission (**ASIC**) or the Australian Prudential Regulation Authority (**APRA**);
- the Australian Federal Police (**AFP**);
- the Australian Taxation Commissioner in respect of tax-related misconduct; or
- a legal practitioner for the purpose of obtaining legal advice or legal representation,

or if it is reasonably necessary to disclose information for the purposes of an investigation, provided their identity is not disclosed and all reasonable steps are taken by SSI Group to reduce the risk that they will be identified.

It is an offence for a person to identify a whistleblower or disclose information in a report about a "disclosable matter" made by them that is likely to lead to their identification, other than as set out above. Reports can also be made anonymously and still be protected under the Corporations Act.

Non-victimisation: We protect whistleblowers from detriment caused because they raised a concern or plan to raise a concern. We do not tolerate anyone threatening to cause or causing detriment to you because of your desire or decision to raise a concern. Doing so is taken seriously by SSI Group and may lead to disciplinary action.

In particular, a whistleblower must not be disadvantaged by any form of detriment or victimisation including reprisals such as dismissal, demotion, alteration of their position or duties, blocking of promotion, discrimination, harassment, intimidation, harm or injury (including psychological harm), damage to property, damage to reputation, damage to their business or financial position or any other damage.

In certain circumstances, these protections will also be enforceable under the *Corporations Act* or the *Taxation Administration Act* (where a report relates to a breach of Australian tax law or tax-related misconduct). Under this legislation, it is an offence for a person to engage in conduct (or threaten to engage in conduct) that causes detriment to you (or another person) if:

- that person believes or suspects that you (or another person) made, may have made, propose to make, or could make a disclosure that qualifies for protection, and
- the belief or suspicion is the reason (or part of the reason) for the conduct.

Where those provisions apply, you are also protected from liability for making the report (either by way of civil, criminal or administrative legal proceedings, or contractual or other remedies being sought against you). Information you disclose cannot be used in legal proceedings against you (except for proceedings in relation to giving false information). However, you will not be granted immunity from the consequences of any misconduct you have engaged in that is revealed by your report (including, but not limited to, any disciplinary action).

When will I be protected?

SSI Group provides protections to whistleblowers who raise concerns pursuant to this policy. SSI Group also provides these protections to any whistleblower who makes a disclosure regarding a disclosable matter that is protected under law to:

- a director, officer or senior manager of SSI;
- an auditor, or a member of the audit team conducting an audit of SSI;
- an actuary of SSI;
- an employee or officer of SSI Group with functions or duties that relate to the tax affairs of SSI, or a registered tax agent or BAS agent who provides tax agent or BAS services to SSI, in relation to tax-related disclosable matters;
- ASIC, APRA, or, in the case of tax-related misconduct, the Australian Taxation Commissioner where it may assist the Commissioner to perform their statutory functions and duties; or
- a legal practitioner, for the purpose of obtaining legal advice or legal representation in relation to your concern.

A disclosure needs to be made directly to one of the above people in order to be able to qualify for protection as a whistleblower under the Corporations Act (or the Taxation Administration Act, where relevant).

In limited circumstances, certain "public interest" or "emergency" disclosures made to parliamentarians or journalists are also protected by law. It is important that you understand the criteria for making a "public interest" or "emergency disclosure" before doing so. For example, you must have previously made a disclosure to ASIC, APRA or another prescribed body before you can make a "public interest" or "emergency" disclosure and, in the case of a "public interest" disclosure, at least 90 days must have passed since the previous disclosure. Please contact the Head of Legal if you would like more information about emergency and public interest disclosures.

What should I do if a protection is breached?

SSI Group takes any breach of these protections seriously. Where you believe a breach has occurred, you should raise a concern with the General Manager Corporate Services.

If you suffer detriment because a person believes or suspects that you or another person has, proposes to make, could make or may make a report that qualifies for protection under the Corporations Act, you can also seek compensation and other remedies through the courts if you suffer loss, damage or injury because of the disclosure, including if SSI Group fails to take reasonable precautions and exercise due diligence to prevent the detrimental conduct. You should seek legal advice if you are considering seeking such remedies.

Is anything not covered by SSI Group's whistleblower program?

SSI's whistleblowing program and the protections under the Corporations Act or Taxation Administration Act generally do not apply to personal work-related grievances. These are usually reports which relate to your employment or engagement.

Instead, these matters should be reported in accordance with SSI's Grievance Resolution Policy

However, this policy will still apply in some circumstances, such as where your concern:

- relates to any detriment caused or threatened to you for raising a concern regarding a disclosable matter;
- relates to a "disclosable matter" (see above), including a breach of employment or other laws punishable by 12 months imprisonment or more;
- has significant implications for SSI Group; or
- relates to misconduct beyond your personal circumstances.

Where in doubt, you should make your report to an eligible recipient under this policy. They will make sure your report is dealt with under the right policy.