

# Whistleblower policy

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CommsChoice Group Ltd  
(Company)

ABN 95 133 368 797

# Whistleblower Policy

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## 1. Introduction

This code of conduct applies to:

- (i). the directors of CommsChoice Group Ltd (**Company**) including the chief executive officer;
- (ii). any executive director;
- (iii). the chief financial officer of the Company; and
- (iv). any other employee or officer of the Company and its related bodies corporate (**Group**)

## 2. Purpose

This Whistleblower policy has been adopted to ensure that people can raise concerns regarding serious actual or suspected contravention of our ethical and legal standards without fear of reprisal, dismissal or discriminatory treatment by doing so.

The policy is to promote and support honest and ethical behaviour. The policy is intended as a last option when all other internal reporting avenues have been exhausted or are not available.

## 3. Objective

The objective of this policy is to provide guidance for whistleblower protection. The objectives are:

- a) encourage the reporting of matters that may cause financial or non-financial loss to the entity or damage to the Company, its reputation or to any individual;
- b) enable the entity to effectively deal with reports from the whistleblowers in a way that will protect the identity of the whistleblower and provide for the secure storage of the information provided;
- c) establish the policies for protecting whistleblowers against reprisal by any person internal or external;

## 4. Scope

This policy applies to employees, (including contractors, consultants and directors).

The chief executive officer is responsible for the maintenance of this procedure.

It is intended to address serious matters, including any actual or suspected:

- a) Dishonest, fraudulent, corrupt or illegal behaviour
- b) Significant mismanagement or waste of funds or resources
- c) Abuse of authority
- d) Improper conduct or unethical behaviour
- e) Serious harm to public health, safety or environment or the health and safety of any employee
- f) Any action taken against, or harm suffered by an employee as a result of making report under this policy

The chief executive officer has the delegated responsibility for setting these standards and monitoring adherence to the policy. All managers are responsible for adhering to the policy and seeking help in any areas in which they require support. Employees are responsible for reporting any incidents and concerns to chief executive officer or the any member of the Board.

## 4. Policy Statement

The Company seeks to promote high standards of conduct and ethical behaviour and wishes to build a

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reputation for high standards and open communication. Should any employee become aware of inappropriate behaviour, they must be able to freely report the issue in the knowledge that the Company will investigate issues and take steps to correct any behaviours that are not consistent with our goals.

Whistleblowing is not about airing a grievance, it is about reporting real or perceived malpractice.

This policy aims to:

- a) Outline how the Company will properly deal with all reported misconduct or unethical behaviour (procedures);
- b) Assist in ensuring that serious misconduct or unethical behaviour is identified and dealt with appropriately;
- c) Staff are aware of their protections and processes.

## 5. Protection

Officers, employees, contractors and employees of contractors qualify for protection as a whistleblower under the Corporations Act.

Where a person makes a disclosure that qualifies for protection under the Corporations Act they are not subject to any civil or criminal liability for making the disclosure and no contractual or other remedy or right may be exercised against them on the basis of such disclosure. This protection extends only to the act of disclosure itself and a person who makes a disclosure will not be granted immunity for any illegal act or wrongdoing in which they were involved.

The person making the disclosure has qualified privilege in respect of the disclosure and, where the disclosure is made in good faith, is protected from a defamation suit. Qualified privilege will stand even where the disclosure turns out to be unfounded as long as the disclosure was made on reasonable grounds and in good faith.

Whistleblowers are protected from actual or threatened victimisation as a result of making a protected disclosure.

Protected disclosures must be kept confidential by the person to whom the disclosure is made.

## 6. Procedures

The chief executive officer is responsible for the maintenance of this procedure.

Where there is non-conformance or breach of this procedure, the chief executive officer is to be advised. Corrective action is to be taken as part of the continuous improvement process

Process Steps:

1. Complaints Procedure	Responsibilities
<p>If an employee become aware of any matte or behaviour they think contravenes the Company’s Code of Conduct, policies or the law, they should:</p> <p>Report the matter to the chief executive officer, a Senior Manager or a member of the Board.</p> <p>In instances where an employee wants to remain anonymous they can use the anonymous staff email address set up for staff suggestions.</p>	<p>* All Staff and Management</p> <p>* Chief executive officer</p>

## 2. Investigating Procedure

Upon receiving the complaint, chief executive officer must report it to the Audit and Risk Management Committee and, where there are allegations of criminal conduct, consideration must be given to referring the matter directly to the police.

The Company must treat all disclosures made under this policy in a confidential, sensitive and secure manner.

Generally, if the complaint concerns the actions of another employee, that person will be informed if the Company considers it appropriate to do so, subject to considerations relating to the anonymity of the employee making the complaint (if applicable).

The chief executive officer will submit a report on the outcome of his/her investigation to the Audit and Risk Management Committee including any recommended actions

Where applicable the chief executive officer will provide feedback on the outcome of the investigation to the employee who has initiated the investigation, and if no action is taken, will provide an explanation for this.

\* Chief Executive Officer  
\* Audit and Risk Management Committee

## 3. Safeguards

Take the matter up with their immediate supervisor or Manager.

Employees making complaints in good faith can rely on the protection afforded by this policy.

Complaints relating but not limited to the following:

- Financial misconduct
- Accounting or internal accounting control matters
- Auditing matters, including non-disclosure or a failure to comply with internal or external audit processes.
- Risk and compliance

Can be made on an anonymous basis.

In all other instances the Company strongly encourages employees to identify themselves when making a complaint under this policy.

No action will be taken against an employee who in good faith makes an allegation which is not confirmed by subsequent investigation.

A report may damage the career prospects and reputation of people who are the subject of serious allegations, therefore disciplinary action may be taken against an individual making malicious or vexatious allegations.

\* All Staff and Management

This policy was approved and adopted by the Board on 27 October 2017

Signed



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Chairperson of the board of directors  
of CommsChoice Group Limited