

Whistleblower Procedure

1 Overview

At Assetlink, we are committed to the highest standards of conduct – both professional and personal which is at the heart of our culture and the foundation of our vision and success. Our shared responsibility in ensuring the highest legal and ethical standards is detailed in the company's, 'Code of Conduct'.

Everyone has a role to play in ensuring that Assetlink continues to operate to the highest standards of conduct. Therefore, this procedure is a key element in supporting a culture of ethical behaviour, accountability, strong corporate governance, effective compliance, and risk management.

All organisations face the risk of things going wrong from time to time, or unknowingly harbouring unlawful or unethical conduct. A culture of openness, accountability and continuous improvement is essential to help prevent such situations occurring, and to promptly address them when they do occur. This includes reporting potential issues when they arise which is commonly referred to as whistleblowing.

2 The role and importance of reporting

At Assetlink, we value and encourage whistleblowing because it helps to identify and escalate potential issues that may not otherwise be uncovered.

3 Purpose

This procedure aims to:

- identify and respond to concerns and foster a culture of continuous improvement.
- encourage the reporting of suspected or actual wrongdoing, misconduct, or an improper state of affairs within Assetlink, by Assetlink or by those that Assetlink has relationships with.
- assist Assetlink in identifying the risk of, or any instances of modern slavery or breaches of Human Rights legislation in Australia and New Zealand, and
- protect the whistleblower (internal or external) from any retaliation that may arise as a result of reporting suspected or actual wrongdoing.

This procedure sets out the procedures and avenues available to a whistleblower reporting to Assetlink.

This document also provides information about Assetlink's approach to handling whistleblowing including the framework for when the whistleblower protections apply, which is when:

- the person making the report as a whistleblower is one of the persons listed in **section 4 (eligible disclosures)**;
- the content of the report made by the whistleblower is in line with the matters listed in **section 6 (eligible disclosures)**; and
- the report made by the whistleblower is to a person listed in **section 6 (eligible recipients)**.

In addition, this procedure explains:

- how as a whistleblower, you can make a report safely, securely, and confidentially.
- how Assetlink will support people who as whistleblowers made reports and protect them from detriment or adverse action.
- Assetlink's framework for receiving, handling, and investigating escalations and reports, including ensuring fair treatment for people about whom a report is made.
- the specific processes and protections that are in place consistent with the whistleblowing framework and approach; and
- how the procedure will be made available.

4 Who does this procedure apply to?

A whistleblower is defined as anyone who makes a report under this procedure located where we carry out our operations in Australia and New Zealand.

This procedure applies to Assetlink’s current and former:

- Officers (for example Directors and Company Secretaries).
- Employees (for example permanent, part-time, fixed term, casual employees),
- Contractors and suppliers, and
- the relatives, dependents, and spouses of current or former officers and employees.

This procedure also applies to people with the following current or former connection to Assetlink:

- suppliers of goods and services (for example contractors, consultants, service providers and business partners).

4.1 Eligible disclosures

Assetlink encourages the reporting of any suspected or actual wrongdoing, misconduct, or an improper state of affairs, including conduct that is dishonest, corrupt, illegal, or unethical, or concealment of such conduct.

We also encourage the reporting of any suspected or actual breaches of Assetlink’s, ‘Code of Conduct’, or any contravention of Human Rights.

For a report to be an eligible disclosure, and therefore entitled to protection under the whistleblower framework and procedure, it must contain information that you have objective, reasonable grounds to suspect concerns, misconduct or an improper state of affairs or circumstances in relation to Assetlink, including the conduct of an Assetlink officer or employee.

It is important to note that a report may still qualify for protection even if the content of the report turns out to be incorrect.

4.2 Examples of eligible disclosures

A report or eligible disclosure does not need to be something illegal and can include (for example)

1. potential violations of laws or regulations. ¹	2. tax related misconduct.
3. conduct that is a danger to the public or the stability of, or confidence in, the financial system.	4. fraud, negligence, default, breach of trust or breach of duty.
5. systemic issues that a regulator should know about to properly perform its functions.	6. business behaviour or practices that may cause client and/or customer harm.
7. certain breaches of our Business Ethics Procedure and Corporate and Social Responsibility Procedure and compendium of companywide policies, procedures, guidelines,	8. unauthorised disclosure, insider trading or other misuse of confidential information.

codes or standards as well as corruption, bribery or market abuse.	
9. criminal acts (e.g., theft, corruption, bribery, market abuse).	10. inappropriate gifts or payments to clients or other third parties including vendors.
11. undisclosed private investments or outside activities.	12. inaccuracies in financial statements or statements to the company's auditors.
13. anti-competitive behaviour or otherwise dishonest or unethical behaviours.	14. a breach of a protection described in this procedure.
15. deliberate concealment of any of the above.	

¹ Including an offence against or a contravention of certain legislation being the *Corporations Act 2001*, the *ASIC Act 2001 (Cth)*, the *Banking Act 1959 (Cth)*, the *Financial Sector (Collection of Data) Act 2001 (Cth)*, the *Insurance Act 1973 (Cth)*, the *Life Insurance Act 1973 (Cth)*, the *National Consumer Credit Protection Act 2009 (Cth)*, the *Superannuation Industry (Supervision) Act 1993 (Cth)*, an instrument made under any of those Acts, tax laws or constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for 12 months or more, or is prescribed by regulation.

4.3 Examples of reports that are not eligible disclosures

Not all whistleblower reports are eligible disclosures. Reports that are not eligible disclosures are not eligible for protection under the whistleblower framework or this procedure. This applies to workplace related grievances, although there are a few exceptions which are listed following this section.

Personal workplace related grievances related to your current or former employment with implications for you personally but do not have any other significant implication for Assetlink or relate to any conduct, or alleged conduct about an eligible disclosure.

Examples of personal workplace related grievances include interpersonal conflicts, decisions relating to your employment or the terms and conditions of your employment, relocation or promotion, or a decision related to you being suspended, disciplined, or terminated. You should raise these types of grievances with the National HR Manager or the Senior National HR Manager, Workplace Relations & HR Strategy Support.

4.4 Exceptions

Whilst personal workplace related grievances are not protected as eligible disclosures, certain reports will be dealt with and protected under this procedure, for example if it:

- includes information about misconduct or information that otherwise qualifies as an eligible disclosure which is referred to as a mixed report.
- relates to any detriment or threat or detriment to you for making a disclosure.
- relates to particular offences or breach of laws, or has significant implications for Assetlink, or
- is made to an Australian or New Zealand qualified lawyer to seek advice about whistleblower protections.

5 Reporting a concern

A concern can be reported by you as a whistleblower in a way that is attributed to you as the person raising the matter or can be reported anonymously.

6 Who can you report to?

We strive to identify and escalate potential issues as early as possible, and to do so, we encourage you to report your concerns to any of the people listed below as internal ‘eligible recipients’ or the company’s Whistleblower Protection Officers. They are our core team for receiving reports and are best placed to support you and deal with your concerns officially and confidentially.

You can make a report to any of the Whistleblower Protection Officers listed below who are ‘eligible recipients’.

It is important to remember that whistleblower report must be made to an eligible recipient in order for it to be protected under the whistleblower framework and this procedure.

6.1 Internal

You may make an eligible disclosure to the following internal eligible recipient or a Whistleblower Protection Officer as follows:

Title:	Senior National HR Manager, Workplace Relations and HR Strategy Support / Whistleblower Coordinator
Name:	Francine Randall
Phone Number:	(02) 9857 7186
Email:	FrancineRandall@assetlink.com.au

6.2 External

You may make an eligible disclosure to the following internal external entities:

- our independent third-party confidential reporting Hotline (found in section 7).
- the ASIC.
- the APRA, and
- the ATO (for tax related concerns).

6.3 Other eligible external recipients

Reports may also be protected when they are made to the following people. In the circumstances listed below, they are:

- Australian and New Zealand qualified legal practitioners only for the purpose of obtaining legal advice or representation in relation to the operation of this whistleblower framework and procedure (in which case your report will be protected even if the matter turns out not to be an eligible disclosure); and
- a member of a State or Commonwealth Parliament or legislature of a territory or a journalist, only for the purpose of making a “public interest” or “emergency” reports. To make such a report, it is important to understand the criteria that must be met, which includes that you provide no more information than is necessary to make the report, and that:

Public interest report:

- a report to the ASIC or APRA has already been made and at least 90 days have passed since the report was made.
- you have reasonable grounds to believe that no action is being taken and that making a further report would be in the public interest; and
- prior to making the public interest report, you have given written notice to the ASIC or APRA that includes sufficient information to identify the previous report and states that you intend to make a public interest disclosure.

Emergency report:

- a report to the ASIC or APRA has already been made.
- you have reasonable grounds to believe the report concerns a substantial and imminent danger to the health or safety of one or more persons in the natural environment; and
- prior to making the emergency report, you have given written notice to the ASIC or APRA that includes sufficient information to identify the previous report and states that you intend to make a public interest disclosure.

7 How to report

7.1 Making a report

You can make a report by confidential telephone call.

You are able to make a report by telephone by calling our confidential Hotline which is operated by a confidential and independent third-party service that provides an external channel for reporting on an anonymous or disclosed basis.

The details for reporting via each method are listed in the box below. Remember - you can choose to remain anonymous when making a report.

If you more	Assetlink Whistleblower Hotline (Toll Free by Telephone) Within Australia: 1800 676 787 Outside Australia: +61 3 8393 3324	want
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information before making a report, you can contact the Whistleblower Coordinator as listed in section 6.1.

7.2 What you should include in your report

You should provide as much information as possible, including details of the circumstances relating to your concern, person or people involved, dates, times, locations and if any more evidence may exist.

You can still be protected under the whistleblower framework and this procedure even if it turns out that you are incorrect. However, you should have reasonable grounds to suspect that the information you are reporting is true (even if you do not have all the details available), and you must not make a report that you know is not true, or is false or misleading. If you knowingly make a false report, this may result in the company taking action.

We strongly encourage you to provide your name when making your report as this will make it easier to investigate and respond to your report.

We appreciate that making a report can be difficult and is not an easy to decision to make let alone act to report it. You can choose to remain anonymous, including during any investigation or after any investigation is finalised. You may also refuse to answer any questions you feel could reveal your identify.

However, bear in mind that if you do not provide your name, responding to your report may be difficult unless sufficient information is provided, and we will not be able to provide you with the practical support if we do not know who you are. We ask that you provide us with a way to maintain contact with you – this can be done via the Whistleblower Hotline.

If you have concerns about whether to provide your name, you can contact the Whistleblowing Coordinator to discuss how we can protect your identity or in the first instance make a report via the Whistleblowing Hotline. You can also provide a pseudonym if you still have concerns.

Further information about how to report confidentially and the protections available are found in section 7.3 below.

7.3 How we protect and support you

This whistleblower framework and procedure establishes the protections that apply to disclosures who qualify for protection, including identity protection (confidentiality), protection from detrimental acts or omissions, compensation and other remedies, and protection from civil, criminal, and administrative liability.

It is important to note that these protections apply only to eligible disclosures made to Assetlink, legal practitioners and regulatory bodies, as well as public interest and emergency disclosures.

7.4 Confidentiality

We treat eligible disclosures confidentially and can protect you by limiting how your identity and information about you is shared, including maintaining your anonymity where requested. Your identity will be kept confidential to the fullest extent possible and only shared as permitted by you or by law. Eligible disclosures that are made on any anonymous basis can still be protected by the whistleblower framework and this procedure, and it is illegal (except in limited circumstances) for a person to identify an eligible discloser, or to disclose information that is likely to lead to the identification of the eligible discloser.

The law allows your identity to be shared in limited circumstances, namely with your consent to ASIC, APRA, a member of the Australian Federal Police, or to an Australian or New Zealand qualified lawyer to seek advice about your whistleblower provisions. The law also allows information in your report to be shared where reasonably necessary for an investigation into your report and that reasonable steps are taken to reduce the risk of you being identified.

Each report is different and our approach to protecting your confidentiality with each report will reflect those different circumstances. Some examples of how we can protect confidentiality includes:

- where appropriate, redacting your personal information from documents and referring to you in gender neutral terms.
- where possible, discussing with you the approach and aspects of your report which risk identifying you.
- limiting sharing of the report to company personnel trained in their confidentiality obligations.
- securely storing materials in relation to a report.
- even where you agree to sharing your identity, limiting the sharing of your identity to a strictly need-to-know basis.
- only sending materials related to your report to secure printers; and
- training internal eligible recipients or the company's Whistleblower Protection Officers in their confidentiality obligations.

7.5 No detriment

No one may cause detriment to you (or threaten to do so) because they think you made, or plan to make, a report and that belief is the reason or part of the reason for the detrimental conduct toward you.

Examples of detriment include discrimination, causing physical or psychological harm, damaging property, and varying an employee's role or duties. Detriment does not include action taken to manage or respond to unsatisfactory work performance or behaviour or unrelated misconduct.

The company has a strict commitment to non-retaliation, as set out in our Business Ethics Procedure as well as Corporate and Social Responsibility Procedure. We may take disciplinary action, up to and including terminating the employment of anyone shown to have caused or threatened detriment to you because you planned to make a report.

7.6 Protection from detriment

Every report is different. Depending on your circumstances, some examples of steps we may take to protect you from detriment include, as appropriate:

- assessing the risk of detriment to you.
- making available support services to you including, where able and appropriate, appointing a Whistleblower Protection Officer to you.
- assisting with strategies to help you minimise and manage stress, time or performance impacts, or other challenges, resulting from your report.
- managing the behaviour of other employees (to the extent reasonably practicable).
- relocating individuals.
- offering leave of absence; and
- advising you about how you can lodge a complaint if you are concerned about detriment.

We will look for ways to support non-employees of the company, but in practical terms we are limited in the support we can provide to them.

At times, these protections are also enforceable under Australian and New Zealand laws.

7.7 Compensation and other remedies

If you suffer loss or injury because you made or plan to make a report, you may seek compensation or other remedies through the courts.

7.8 Protection from civil, criminal, and administrative liability

You are protected from civil, criminal, or administrative legal action being taken against you because you made a report. This means legal or disciplinary action cannot be taken against you for reasons including a breach of your employment contract, breaching confidentiality, or unlawfully releasing information because you made a report.

However, you will not have immunity from liability or disciplinary action for any misconduct you have engaged in.

7.9 If you are a subject of a report

A person who is themselves the subject of a report will be treated fairly and objectively, with any findings made on the basis of reliable evidence. The identify of a person being investigated will be kept confidential to the extent practicable and the person will be provided access to the Employee Assistance Program. Where and when appropriate, a person being investigated will be given details of the report that involves them (to the extent permitted by law) and an opportunity to respond.

7.10 Other support

You can contact the Employee Assistance Program (LifeWorks) on 1300 361 008.

How we respond to your report

8.1 How we handle reports

All reports are received and treated sensitively and seriously, and will be dealt with promptly, fairly, and objectively.

Our response will vary depending on the nature of the report and the amount of information provided. Where able, the eligible recipient will acknowledge your report, we will then assess your report. We will then assess your report to determine if it is an eligible disclosure, what steps will be taken to respond, including any formal investigation, and what steps should be taken to manage any risk of detriment.

The Whistleblowing Coordinator will coordinate the company's response, including ensuring any escalation of the report internally, including on a de-identified basis or otherwise with your agreement.

Where applicable and appropriate, the report may be referred for escalation in accordance with the whistleblowing framework and this procedure. In those cases, the protections set out in this procedure will still apply.

If you have provided contact details or are otherwise contactable through an anonymous method such as Assetlink's Whistleblower Hotline, you will be provided with updates, including the outcome of any investigation where appropriate.

In general, we seek to provide you with updates if and when an investigation is commenced, during an investigation as appropriate and on the completion of any such investigation. However, the timing of the updates and level of detail we can provide will depend on the nature of your report and the circumstances. It may not be appropriate to provide details of the investigation or the outcome to you.

8.2 How we investigate reports

While the scope and timeframe for any investigation differs depending on the report being examined, any investigation commenced will be conducted in a timely manner and will be fair and independent from you, as well as the person or person, persons, department or team, or business unit involved in the eligible disclosure.

In determining the appropriate approach to each investigation, factors that we may need to consider include whether it qualifies for protection, whether an internal or external investigator should lead the investigation, and the nature of any technical, financial, or legal advice that may be required to support an investigation. All employees are required to cooperate fully with any investigation.

8.3 Investigation findings and further action

How the findings of the investigation are documented and reported, and what steps shall be taken, will depend on the nature of your report.

Generally, an investigation identifies a breach of our Corporate and Social Responsibility Policy, including the compendium of companywide compliance policies or other internal policies and procedures, appropriate action will be taken. This may include but is not limited to terminating or suspending the employment or engagement of a person or persons involved as well as considering compensation impact and equity impact. Any outcome will be determined at Assetlink's absolute and sole discretion.

8.4 Review of investigations

If you are not satisfied with the outcome of an investigation, you may seek a review of whether the investigation has complied with our policies and procedures by contacting the Senior National HR Manager (or another person not involved in the initial report or investigation) who will review the

investigation and consider whether it was conducted in accordance with our procedures. The Senior National HR Manager in their sole discretion, will determine to reopen the investigation if they conclude further investigation is required or that new information is available. If you are still not satisfied with the outcome of the investigation, you may consider raising the matter with another eligible internal recipient or Whistleblower Protection Officer as listed in section 6.1.

9 The importance of your assistance

We may be unable to investigate your report (or be practically limited in what we can do) if we cannot contact you or you do not agree to allowing an investigator to contact you.

Without your agreement, where the protections apply, we cannot share your identity, and we can only share information in your report to the extent where identifying information has been removed and it is reasonably necessary for the investigation.

As a result, it is important for you to assist us by sharing your identity (so we can contact you) and allow us to share your identity for any investigation. Otherwise, we may be unable to effectively investigate and deal with the report.

10 Training

We provide periodic training, including training at induction, to:

- employees about the procedure and their rights and obligations under it.
- eligible recipients and those involved in dealing with reports about how to handle and respond to reports.

In addition, from time to time:

- hold employee briefing sessions and/or smaller team meetings.
- post the Procedure on our intranet or other communication platform.
- post information on team member site Notice Boards, and
- incorporate the procedure into employee induction information packs and training for new starters.

11 Oversight and reporting

The Board has ultimate oversight over this framework and procedure and will receive a summary of any report made under this procedure on a periodic basis. The Board will be provided additional information about any material incidents raised.

De-identified outcomes and learnings will be reported to the Board. Outcomes will also factor into promotion and/or fixed and/or variable compensation decisions.

This procedure will be periodically reviewed for effectiveness and to check whether any changes are required.

12 Roles and responsibilities

Role	Responsibilities
Board	Responsible for approving updates to the procedure and receiving and reviewing a periodic summary of reports.
Eligible Recipient	Receive reports under this procedure and refer reports to the Whistleblowing Coordinator.
Senior leadership / management	Set a positive and open environment in which reporting is encouraged, including ensuring that an employee who makes a report are provided with adequate protections and support, and there are early interventions (if necessary) to protect from detriment when making a report.
Whistleblowing Coordinator	<p>Acts as a contact point where employees can seek accurate and confidential advice or information, without formally making a disclosure.</p> <p>Coordinates responses to reports, including assessing whether a report is an eligible disclosure and determining whether to commence a formal investigation.</p> <p>Liaises with and escalates reports internally, as required. Responsible for periodically reviewing and updating the procedure (and associated processes and procedures, and for implementing and overseeing any changes).</p>
Whistleblower Protection Officer	<p>Senior National HR Manager is to provide additional support for a person who has made a disclosure under this procedure.</p> <p>Particularly, to act as a point of escalation where there is a query related specifically to the outcome of an investigation where it may impact the whistleblower directly.</p> <p>Any further action may include a review of the investigation and the outcome/s reached as well as a final determination regarding the nature of any impact to the whistleblower, or otherwise.</p>
Investigator	Assigned by the Senior National HR Manager to investigate a report.
Executive Leadership	Responsible for providing an outcome, recommendation, ensuring Team that any disciplinary outcome is considered including making compensation and promotion determinations.

People and Culture Team Responsible for dealing with and addressing any personal workplace related grievances.

Legal and Compliance Another point of escalation and consultation in relation to exercising this procedure.

Employees Understand and comply with this framework and the application of this procedure.

13 Questions and further information

This version of the framework and procedure will be available via iLink on the company's website.

Any questions about this procedure, including questions about making a report, should be referred to the Whistleblowing Coordinator or Senior National HR Manager.

This procedure does not form part of terms of employment and may be amended from time to time.