

# PROTECTED DISCLOSURES (WHISTLEBLOWER) POLICY

## Intent & Purpose

This Whistleblower Policy has been put in place to ensure employees and other Disclosers can raise concerns regarding any misconduct or improper state of affair or circumstances (including unethical, illegal, corrupt or other inappropriate conduct) without being subject to victimisation, harassment or discriminatory treatment.

## Operation and Incidence

### *Application*

Reports can be made under this Policy by anyone who is, or has been, any of the following within the company;

- employees (including permanent, part-time, casual, fixed term or temporary employees, interns, and secondees);
- Directors;
- officers;
- contractors (including employees of contractors);
- suppliers (including employees of suppliers);
- consultants; and
- Relatives, dependants, spouses, or dependents of a spouse of any of the above.

A “*Discloser*” is any of the above individuals who makes a report in accordance with this Policy.

### *Policy Principles*

The is intended to:

- encourage Disclosers to report an issue if they have reasonable grounds to believe that someone has engaged in serious wrongdoing;
- outline how to deal with whistleblowing reports; and
- set out the avenues available to Disclosers to report serious wrongdoing.

Whilst it is generally expected that these issues will be raised through the normal channels of line management, reporting by other avenues may be appropriate or necessary in certain situations.

### *Matters that should be reported*

Any matter that a Discloser has reasonable grounds to suspect is misconduct or an improper situation or circumstances in relation to the company should be reported in accordance with this Policy.

Personal work-related grievances are excluded from this Policy and will be handled under the Grievance Policy SMS 307 POL. An example would be an interpersonal conflict between an

employee, or a decision relating to employment or engagement, such as a remuneration, transfer, promotion or disciplinary action of an employee. These types of grievances would follow the company Complaints and Grievances Procedure

### **Reportable Conduct**

Means any conduct in relation to Springmount Services that includes:

- dishonest, fraudulent or corrupt activities
- illegal activity such as theft, drug sale or use, violence, harassment or intimidation, criminal damage to property or other breaches of state or federal law;
- unethical conduct or in breach of Springmount Services' policies such as bribery, dishonestly altering company records or data, adopting questionable accounting practices or wilfully breaching Springmount Services' Code of Conduct or other policies or procedures;
- activity which is potentially damaging to Springmount Services, a Springmount Services employee or a third party, such as unsafe work practices, environmental damage, health risks or abuse of Springmount Services property or resources;
- abuse of authority;
- harassment, discrimination, victimisation or bullying.

### **Reasonable Grounds**

A Discloser must have reasonable grounds for a report made under this Policy. A mere allegation with no supporting information is unlikely to be considered as having reasonable grounds. However, a Discloser does not need to prove their allegations. A Discloser will still qualify for protection under this Policy even if their disclosure turns out to be incorrect.

**False Reports** The reporting of false information is taken very seriously by Springmount Services. Individuals who deliberately or knowingly report false information will not be able to access the protections available under this Policy for Disclosers, or any legal protections, and individuals who are employees, officers or contractors of the company may be subject to disciplinary action or termination of engagement.

### **Guidelines**

Whistleblowing should be reported and managed in accordance with the company's Whistleblower Guidelines.

## **Subordinate documents**

- SMS 3071 DOC Complaints and Grievances Procedure
- SMS 1091 DOC Whistleblower Guidelines

## RACI

Responsible	It is the responsibility of the Operations Manager to implement, maintain and communicate this policy.
Accountable	The final authority for this policy lies with the Managing Director.
Consulted	When making changes to this policy, a consultation should be carried out with the leadership team.
Informed	All changes to this policy should be communicated to all leaders.

Springmount Services respects the privacy of our people and clients and has established systems and procedures to protect their privacy. We will comply with our legal requirements regardless of jurisdiction or circumstances.

In accordance with the national and state Privacy Principles, Springmount Services will:

- Only collect personal information from you with your prior knowledge and consent.
- Only use personal information provided by you for the purposes for which it was collected.
- Not disclose your personal information to a third party without your consent.
- Not disclose your personal information to other institutions and authorities except if required by law or other regulation.
- Remove personal information from our records when it is no longer required (except when archiving is required).
- Use our best endeavours to protect the personal information that the company have under our control from unauthorised access and improper use.

### *Breach of The Policy*

Breach of this policy may be regarded as misconduct, leading to disciplinary action which may result in termination of employment or engagement. An individual may also be exposed to criminal or civil liability for a breach of relevant legislation.