

## Whistle-blower Policy

### Policy Statement

The Whistle-blower Policy provides a framework for employees, contractors, and other stakeholders to raise concerns about potential violations of law, regulation, or company policy. This policy encourages and protects individuals who report such concerns in good faith and ensures that commUnity+ will take appropriate action in response to credible reports of misconduct.

### Child Safety Statement

Comm Unity Plus Services Ltd commits to the safety of children and young people in all that we do. It is the responsibility of all members of our team.

We understand that we have a responsibility to uphold the safety and wellbeing of children and young people who come in contact with us, our team and services. Their safety and wellbeing will always be our first priority.

We will always act promptly when we learn that a child is at risk.

### Purpose

This policy is established to ensure people can report instances of suspected unethical, illegal, fraudulent, or undesirable conduct by commUnity+, its Board members, employees, volunteers or consultants, and contractors. This policy is designed to ensure that all reports are properly investigated, and appropriate action is taken to resolve any problems that are identified. It also, provides a confidential and secure mechanism for individuals to report such incidents and protects them from retaliation.

### Authorisation and Responsibility

Level	Position
Authorisation	Board
Responsibility for implementation	CEO

### Scope

This policy applies to all Board members, employees, volunteers, and other stakeholders of commUnity+, regardless of their position, location, or level of seniority who have reasonable grounds to suspect a violation of law, regulation, or organisational policy.

### Policy

commUnity+ is committed to promoting a culture of ethics and integrity and maintaining the highest ethical and legal standards in all of its operations. This Whistle-blower Policy provides a framework for employees, contractors, and other stakeholders to raise concerns about suspected violations of law, regulation, or organisational policy.

This policy encourages and protects individuals who report such concerns in good faith from retaliation and ensures that commUnity+ will take appropriate action in response to credible reports of misconduct.

commUnity+ encourages all employees, contractors, and other stakeholders to use this mechanism to report suspected violations to promote a culture of integrity and transparency. With any disclosure, the following will apply:

1. **Confidentiality:** commUnity+ will maintain the confidentiality of the reporting individual, to the extent possible, consistent with the need to conduct an adequate investigation
2. **No Retaliation:** commUnity+ prohibits retaliation against any individual who reports a suspected violation in good faith. Retaliation includes but is not limited to, any adverse employment action, harassment, or discrimination
3. **Reporting:** Employees, contractors, and other stakeholders may report suspected violations of law, regulation, or organisational policy to the designated point of contact, who will be responsible for receiving and investigating the reports. The designated point of contact may be an internal auditor, the legal department, human resources, or another designated individual within the organisation
4. **Investigation:** commUnity+ will conduct a prompt and impartial investigation into each report of suspected misconduct. The investigation will be conducted by an individual or team with appropriate expertise and independence. commUnity+ will take appropriate action based on the results of the investigation
5. **Protection from Retaliation:** Any employee, contractor, or other stakeholders who believes that they have been subjected to retaliation in violation of this policy should immediately report such retaliation to the designated point of contact. commUnity+ will take appropriate action to address any retaliation and will take steps to prevent further retaliation
6. **Anonymous Reporting:** Employees, contractors, and other stakeholders may choose to report suspected violations anonymously. However, anonymous reporting may limit commUnity+'s ability to conduct a thorough investigation and take appropriate action
7. **Training:** commUnity+ will provide training to employees and other stakeholders on the provisions of this policy, including the process for reporting suspected violations and the prohibition against retaliation.

The types of wrongdoing that can be reported under this policy include those protections under the Corporations Act that are available to disclosers who qualify for protection as a whistle-blower.

This policy does not cover personal work-related grievances. Refer to the Grievance policy on how to internally raise grievances that are not covered by the policy.

Whistle-blowers may contact the following to obtain additional information before making a disclosure:

- legal practitioners
- regulatory bodies and other external parties; and
- members of Commonwealth, state, or territory parliaments (parliamentarians), under certain circumstances
- eligible recipients being:
  - an officer or member of the Senior Leadership Team or Board of commUnity+;
  - the internal or external auditor (including a member of an audit team conducting an audit) or actuary of commUnity+; and
  - a person authorised by the entity to receive disclosures that may qualify for protection.

### **Legal and practical protections for disclosures**

Whistle-blower protection under the Corporations Act:

- identity protection (confidentiality)
- protection from detrimental acts or omissions
- compensation and remedies
- civil, criminal, and administrative liability protection
- protect the confidentiality of a discloser’s identity, and
- protect disclosers from detrimental acts or omissions.

This policy does not cover disclosures that are not about ‘disclosable matters’ that do not qualify for protection under the Corporations Act. commUnity+ discourages deliberate false reporting. Disclosures can be made anonymously and are protected under the Corporations Act.

**Making a disclosure**

A whistle-blower may elect to make a disclosure anonymously and/or confidentially, securely, and outside of business hours. commUnity+ will respect the whistle-blower’s request to not identify them. However, commUnity+ may not be able to investigate certain disclosures without the identity of the whistle-blower becoming known.

The commUnity+ Board will appoint a Protected Disclosure Officer who will be responsible for managing reports and response actions. commUnity+ will take all reasonable steps to protect and respect the rights of a person who reports alleged improper conduct in good faith.

commUnity+ will not tolerate any threats of retaliatory action against any person who has made or who is believed to have made a report of Improper Conduct in good faith.

Any such retaliatory action or victimisation in reprisal for a report being made under this policy will be treated as serious misconduct and will result in disciplinary action, which may include dismissal.

Where criminal matters are involved, or mandatory reporting is necessary, commUnity+ may be required to report certain allegations to the police (or other relevant agency) and provide the identity of the whistle-blower.

If the identity of the whistle-blower does become known, commUnity+ will continue to ensure that all reasonable steps are taken to protect the whistle-blower from reprisal.

commUnity+ members who breach confidentiality in relation to a known or suspected disclosure will be subjected to disciplinary proceedings, which may include summary dismissal.

This policy must be published on the commUnity+ website and intranet for access to all.

**Review**

This policy will be reviewed annually by the GMSS with endorsement by the CEO for approval by the Board to ensure that it continues to comply with relevant state or federal legislation or regulation.

Activities	Frequency
Review	Annually

## Related Documents

<b>Legislation:</b>	<ul style="list-style-type: none"> <li>- <a href="#">Privacy Act 1988</a></li> <li>- <a href="#">Occupational Health and Safety Act 2004</a></li> <li>- <a href="#">Corporations Act 2001</a></li> </ul>
<b>Standards and Guidelines</b>	<ul style="list-style-type: none"> <li>- <a href="#">ASIC Regulatory Guide 270 – Whistle-blower</a></li> </ul>
<b>Organisational Documents:</b>	<ul style="list-style-type: none"> <li>- <a href="#">Code of Conduct Policy</a></li> <li>- <a href="#">Grievance Policy</a></li> <li>- <a href="#">Workplace Health and Safety Policy</a></li> <li>- <a href="#">Child Safety Policy</a></li> <li>- Glossary of Terms</li> </ul>

## Version Control

Version	Code Type	Change	Authorised	Date
1	N/A	Reviewed Protected Disclosure (Whistleblower) policy	Board	16 December 2022
2	POL012	Reviewed, renamed, and reformatted from Protected Disclosure Policy	Governance Committee	8 March 2023
2.1	POL012	Update after Governance Committee Reviews per March 2023 minutes	Board	17 April 2023