



# WHISTLEBLOWER POLICY

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**Jurisdiction:** Global

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# AUSTRALIAN WOOL INNOVATION LIMITED

## WHISTLEBLOWER PROTECTION POLICY

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# WHISTLEBLOWER PROTECTION POLICY

## Introduction

AWI is committed to maintaining a high standard of integrity and good corporate governance in all of its activities.

The Whistleblower Protection Policy (Policy) forms part of AWI's risk management framework.

A critical component of AWI's strategy is maintaining its reputation for delivering its services in a reliable and credible manner.

## What does this Policy do?

The aim of this policy is to make AWI People feel confident about raising concerns internally by offering a reporting and investigative mechanism that is objective, confidential, independent and protects AWI People from reprisal or disadvantage.

This Policy applies to:

- Directors and officers
- Managers
- Employees; and
- Contractors and consultants providing services for AWI

(each an "AWI Person" and collectively "AWI People")

Under this Policy:

- AWI People are encouraged to report concerns, whether openly or, if preferred, anonymously
- if AWI People report concerns, they will be afforded confidentiality unless they indicate (or the law requires) otherwise.
- concerns reported by AWI People will be properly investigated with a view to establishing the truth and correcting any wrongdoing where possible
- An AWI Person who has reported a matter under this Policy will be advised of the outcome of the investigation and any action taken as much as practicable
- AWI People will not be victimised or adversely affected because of their action in reporting concerns provided of course, that there is a basis for those concerns, and that the AWI Person has acted in good faith and without malicious intent.

## Who does this Policy apply to?

This Policy applies to anyone who is employed by or works at AWI, including employees (whether permanent, part time, fixed-term or temporary), contractors, consultants, secondees and directors (collectively "AWI People" or "AWI Person" as the context requires).

## Policy on Whistleblowing

All AWI People have a responsibility to help detect, prevent and report instances of suspicious activity or wrong doing, referred to as a "Reportable Matter". AWI People are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage with their immediate manager, and serious matters will then be escalated through to senior management.

AWI is committed to ensuring that all employees have a safe, reliable and confidential way of reporting any Reportable Matters. You should report a Reportable Matter under this Policy if you:

- ☐ have previously reported a Reportable Matter and you are not satisfied with the response to your report; or
- feel unable to raise the Reportable Matter with your manager, either because your manager is the subject of your report or because you have another reason to believe that your manager is unlikely to deal with the report properly.

### **What is a “Reportable Matter”?**

A Reportable Matter is any concern (actual or suspected) about the following conduct, or the deliberate concealment of such conduct:

- financial irregularity (including a fraud against AWI or a customer or supplier)
- corrupt conduct
- criminal conduct
- failure to comply with any legal or regulatory obligation
- unfair or unethical dealing with a customer
- unethical or other serious improper conduct, including breaches of AWI policies
- misconduct, or an improper state of affairs or circumstances
- danger to the public
- offence against any other applicable law that is punishable by imprisonment for a period of 12 months or more

### **How to Report**

Any report under this Policy can be made via any of the following, noting it may depend on the matter and the person who is the subject of the matter:

- relevant General Manager (if not your immediate manager)
- Group Manager People & Culture
- CEO
- Chair of the Finance and Audit Committee

You may at any stage skip a person in the chain outlined above if that person is the subject of the report or if you have another reason to believe that the person is not likely to deal with the report properly.

While reports can be made anonymously if preferred, this may affect the ability to investigate the matter properly and to communicate with you about your report.

Nothing in this Policy should be taken as restricting AWI People from reporting any matter or providing any information to a regulatory authority.

### **If you need help with this Policy**

At any stage, you can report the matter to Group Manager People & Culture or the Company Secretary, whether specifically or because you would like general advice on this Policy or its application to a given set of facts.

Action required when your Report is made

The person who you make a report to under this Policy must do the following:

- ensure that the matter is properly investigated by the person nominated for the purposes of this Policy as the Whistleblowing Investigations Officer or some other independent and suitably qualified person nominated by the Chief Executive Officer or the Chair of the Audit & Risk Committee)
- give the Group Manager People & Culture particulars of the report that has been made

### **Investigation Process**

Investigation processes will vary depending on the precise nature of the conduct being investigated. The purpose of the investigation is to determine whether or not the concerns raised are substantiated, with a view to AWI then rectifying any wrongdoing uncovered to the extent that this is practicable in all the circumstances.

The investigation will be thorough, objective, fair and independent of the AWI Person who reported the matter, anyone who is the subject of the Reportable Matter, and any business unit concerned. The investigation will also have proper regard to applicable legislation and standards on Whistleblowing.

### **Communicating with you about your Report**

The Whistleblower Investigations Officer will keep you informed of the outcome of the investigation arising from your report, subject to considerations of the privacy of anyone who is the subject of the Reportable Matter and normal confidentiality requirements.

### **Your Protection**

The person who you make a report to under this Policy may, if you agree, disclose your identity to the Whistleblower Protection Officer, but will otherwise keep your identity confidential. They will ensure that all files relating to your report are kept secure, and that information received from you is held in confidence and is only disclosed to a person not connected with the investigation if:

- you have been consulted and have consented to the disclosure, or
- it is required or permissible by law

It is possible that someone might deduce your identity without there having been a breach of confidentiality, if the nature of your report points to one particular individual having made it, or otherwise as a consequence of the nature of the investigatory process.

AWI recognises that “whistleblowing” can be a very stressful and difficult thing to do. Provided that you are acting in good faith and that you have not yourself engaged in serious misconduct or illegal conduct, to the maximum extent possible you will not be subject to disciplinary sanctions by AWI in relation to any matters that you report.

AWI will safeguard your interests, having regard to this Policy, the Australian Standard on Whistleblower Protection Programs, and any other applicable policies and laws.

In particular, AWI will take whatever action is possible consistently with this Policy to make sure that you are not personally disadvantaged for making your report, whether by dismissal, demotion, any form of harassment, discrimination or any form of current or future bias.

If you claim to have been the subject of any such action as a consequence of making your report, and the matter cannot be resolved with you by management, the matter will be referred to the Chair of the Audit & Risk Committee.

Any person found in breach of the provisions in this Policy will be subject to disciplinary procedures, up to and including the termination of their employment or engagement with AWI.

### **Whistleblower Protection Officer**

The Group Manager, People & Culture is appointed as a Whistleblower Protection Officer with powers and duties consistent with the Australian Standard on Whistleblower Protection Programs.

### **False Reporting**

A false report of a Reportable Matter could have significant effects on AWI's reputation and the reputations of other staff members and could also cause considerable waste of time and effort.

Any deliberately false reporting of a Reportable Matter, whether under this Policy or otherwise, will be treated as a serious disciplinary matter.

### **Records**

The Group Manager, People & Culture will maintain a record of all whistleblowing incidents and actions taken under this Policy, so that the Policy can be periodically reviewed.

### **Questions**

Any questions about this Policy should be directed to the Group Manager, People & Culture or Company Secretary.

Regulatory Assurance.

Specific questions about whistleblower protection issues can be directed to the Whistleblower Protection Officer.

Contact List

Whistleblower Protection Officer: Group Manager, People & Culture

Whistleblower Form



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