

Whistle Blowing Policy

GWA1012

Created by	Project & Risk Lead	Date	MAR 2017	Version No.	1.2
Updated by	GM People & Performance	Date	OCT 2020	Pages	4
Approved by	CFO and Executive Director & Company Secretary	Date	OCT 2020	Next Review Date:	OCT 2022

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1. Objective

GWA is committed to the highest standards of openness, probity and accountability and seeks to ensure compliance with all whistle blowing legislation. An important aspect of accountability and transparency is a mechanism to enable staff and other members of the Company to voice concerns in a responsible and effective manner. The objective of this Policy is to ensure that concerns are raised and dealt with at an early stage and in an appropriate manner. The policy is made available to all employees on the GWA Intranet under the heading 'HR Policies' in the Human Resources Section.

2. Scope

The Whistle Blowing Policy provides an avenue for employees to raise concerns of malpractice they believe to be occurring at work. Such concerns may include (but not limited to):

- unlawful or unethical conduct;
- financial malpractice;
- fraud or corruption;
- conduct that could affect GWA Group's customers;
- dangers to employees, the public, the environment or financial system;
- failures to comply with the Company's Code of Conduct; and/or
- any other matters or concerns of malpractice that should be reported, including information concerning misconduct, or an improper state of affairs or circumstances in relation to the Company.

Personal work-related grievances are excluded for the purposes of section 2. Please refer to GWA1003 Complaint & Grievance Policy which deals specifically with personal work-related grievances.

Examples of personal work-related grievances include:

- an interpersonal conflict between the discloser and another employee;
- a decision relating to the engagement, transfer or promotion of the discloser;
- a decision relating to the terms and conditions of engagement of the discloser; and
- a decision to suspend and terminate the engagement of the discloser, or otherwise to discipline the discloser.

3. Responsibilities

It is every employee's responsibility to raise any issues they become aware of related to the matters outlined in section 2. The steps for reporting issues are outlined in section 4.2. Serious matters should be raised either with the employee's functional ELT member or directly with the Company Secretary; Chief Financial Officer; General Manager People & Performance or through the confidential Whistleblower email. Once aware of a whistleblowing issue the ELT member is responsible for notifying the Chief Executive Officer and for the investigation of the complaint.

4. Policy

4.1 Protecting the Employee

If an employee raises a genuine concern (a **discloser**) under this Policy, they will not be at risk of losing their job, nor will they suffer any form of detriment as a result of making the complaint. The discloser will be protected provided they have reasonable grounds and are acting in accordance with this Policy.

The Company will not tolerate victimisation or conduct that causes detriment to the discloser raising a genuine concern under the Whistle Blowing Policy.

The Company will ensure that the discloser's identity is protected. This does not apply in the event the discloser has given their consent for their identity to be revealed or the disclosure is made externally to the Australian Securities Investment Commission, the Australian Prudential Regulation Authority, a legal practitioner or the Australian Federal Police.

If a discloser requires support as they make a disclosure they can contact the company's EAP Service.

4.2 How to make a disclosure

A disclosure may be made:

- internally to management
- through our Whistleblower email
- to external authorities

4.2.1 Making a disclosure internally to management

A discloser should specify from the outset if they wish the matter to be treated in confidence so that appropriate arrangements can be made.

If the discloser has any evidence to support their concern, they are encouraged to provide it to the person they raise their concern with.

Step 1 - If a discloser has a concern about malpractice, they should consider raising it initially with their Senior Manager. This may be done orally, or in writing.

Step 2 - If a discloser feels that they are unable to raise a particular matter with their Senior Manager, for whatever reason, they should raise the matter with their head of department, or the Divisional Head.

Step 3 - If these channels have been followed and the discloser still has concerns, or if the discloser feels that the matter is so serious that they cannot discuss it with any of the above, they should discuss it with the discloser's functional ELT member or directly with the Company Secretary, Chief Financial Officer or General Manager People & Performance. Refer to contact details in section 7 below.

4.2.2 Making a disclosure through the Whistleblower email

If an employee would prefer to make an anonymous disclosure they may do this through the Whistleblower email GWAYourCall@gwagroup.com.au

This enables disclosures to be made anonymously and confidentially to a Disclosure Officer. Whilst we prefer disclosers to share their identity in order to facilitate an investigation, they are not required to identify themselves.

Your identity will not be disclosed by GWA unless:

- The employee consents to disclosing their identity
- The disclosure is required by law
- It is necessary to prevent a serious threat to a person's health or safety

4.3 How the matter will be handled

4.3.1 Internally to management

Once a discloser has informed the Company of their concern, the concerns will be examined, and the Company will assess what action should be taken. This may involve an internal enquiry or a more formal investigation where an external investigator may be appointed. The discloser will be told who is handling the matter and whether any further assistance may be needed.

If the discloser has any personal interest in the matter, this should be declared by the discloser at the outset.

4.3.2 Through the Whistleblower email

The Disclosure Officer will:

- Receive the disclosure made
- Make a record of the information provided
- Ensure the disclosers identity is kept confidential if they wish
- Carefully assess the information provided to decide the best action to take, including whether an investigation is required, to determine whether the misconduct is proven or not proven
- Keep the information provided in a confidential and secure system
- Coordinate and oversee the investigation where and investigator has been appointed
- Advise the discloser of the progress of the matter to the extent it is legally permissible and appropriate to do so
- Take all reasonable steps to ensure the identity of the discloser and the person/s who is the subject of the disclosure are kept confidential

4.4 Investigation Principles

Any investigation will be carried out by an impartial and appropriately skilled person.

The Company will take steps to ensure the investigator:

- is in a position to act in a reasonable time frame;
- follows and applies the principles of natural justice;
- has access to relevant individuals where reasonably possible;
- is advised of the identity of the decision maker to whom a report of findings and recommended action is to be made; and
- preserves the confidentiality of the investigation and report.

GWA will treat disclosures in the strictest confidence. All reports and records relating to a disclosure will be stored securely and able to be accessed only by authorised employees.

The confidentiality provisions do not preclude anyone involved in the disclosure from sharing the information with their representative or support person.

4.5 Matters Raised Maliciously

Disclosers who maliciously raise a matter that they know to be untrue will be subject to the Disciplinary Policy. Any disciplinary action could result in the termination of the discloser's employment (if the discloser is an employee).

5. Whistleblower channel information for External Whistleblowers

Contractors, former employees, customers, suppliers of goods or services, whether paid or unpaid (and their employees), relatives, spouses and dependents of the before mentioned persons, associates of the Company and other external persons who wish to raise a concern under this Policy can contact the Company Secretary, Chief Financial Officer or General Manager People & Performance. Refer to the contact details in section 7 below.

6. Definitions

Detriment includes dismissal, alternation to position, discrimination, harassment, injury in employment or damage to reputation.

Malpractice means immoral, illegal or unethical professional misconduct or neglect of professional duty including any instance of improper professional conduct.

7. Nominated Disclosure Officers

Patrick Gibson
Chief Financial Officer
Phone: +61 2 9814 7372
Email: pgibson@gwagroup.com

Richard Thornton
Company Secretary
Phone: +61 7 3131 5826
Email: rthornton@gwagroup.com

Patricia Oliver
General Manager People & Performance
Phone: +61 2 98575 6805
Email: poliver@gwagroup.com