



SNP Management System

Document Profile

Title	Whistleblower Protection Policy
Type	Policy
Division	Human Resources
Branch	National
Intended for	All personnel

Introduction

Whistleblowing is about people taking steps to right perceived wrongdoings. Unchallenged, such wrongdoing can reduce profitability, tarnish SNP's reputation, demoralise employees, and result in substantial fines or costly lawsuits.

SNP's Code of Conduct and our policies generally have been developed to ensure high standards of conduct and ethical behaviour in all of our business activities.

We have developed this policy to ensure that people can raise concerns about actual or suspected contravention of our ethical and legal standards without fear of reprisal or feeling threatened by doing so.

Why was this policy created?

This policy was created to:

- encourage people to internally report an issue if they genuinely believe someone has contravened our Code of Conduct, policies or the law;
- outline how SNP will deal with all reported misconduct or unethical behaviour; and
- assist in ensuring that serious misconduct or unethical behaviour is identified and dealt with appropriately.

Who does this policy apply to?

This policy applies to all employees and officers of SNP Security whether full time, part time or casual.

What is the policy?

All employees are encouraged to report any genuine matters or behaviours that they honestly believe contravene SNP's Code of Conduct, policies or the law.

In doing so, SNP Security assures them they may do so without fear of harassment or sanction by SNP Security or other members of its team.

What sort of concerns should I report?

You should report any actual or suspected:

- conduct or practices which are illegal or breach any law;
- breach of any of SNP Security's policies;



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- corrupt activities;
- theft, fraud or misappropriation;
- significant mismanagement or waste of funds or resources;
- abuse of authority;
- serious harm to public health, safety or environment or the health and safety of any SNP Security's employee's; or
- action taken against, or harm suffered by, an employee as a result of making a report under this policy.

Important

This policy does not apply to raising grievances about an employee's personal situation, which is covered by the Employee Grievances procedure. This policy is primarily concerned with employees raising concerns about actions or behaviours of others or of SNP Security itself.

If you are not sure about whether a particular concern should be raised under the whistleblowing policy or under the grievance policy or both, we encourage you to raise your concern under this policy and the General Manager People and Partners Strategy will decide how the concern should be dealt with.

Who should I talk to?

If you become aware of any matter or behaviour you think contravenes our Code of Conduct, policies or the law, then you should:

- report the matter to the General Manager People and Partners Strategy, Corporate Counsel or the Company Secretary or a Director of the company;
- report it to your immediate supervisor or manager where you feel comfortable to do so.

What happens if I make a complaint?

Any complaint made under this policy is confidential and anonymous. No details of your participation in this process will be included in your personnel file or performance review. The report will not be disclosed to anyone except those that are actively involved in investigating the matters raised in the report.

When you make a complaint the matter will be investigated appropriately and, where applicable, will provide feedback regarding the investigation's outcome. We will take any required action in response to a report resulting from the investigation and explain what action will be taken, or that no action will be taken, and why.

What happens if I am mistaken?

If you raise a genuine concern under this policy, you will not be at risk of losing your job, nor will you suffer any form of detrimental action as a result. As long as you are acting in good faith and in accordance with this policy, it does not matter if you are mistaken.

However, if you make a report that is malicious or otherwise not in good faith, it may damage the career prospects and reputation of anyone who is the subject of your allegations. In this case, you may face disciplinary action under the Managing Performance policy.



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Need more information?

Please contact the People and Culture Department if you have any queries or concerns about this policy.

Related policies

- Code of Conduct