



SNP Management System

Document Profile

Title	Whistleblowing Policy
Type	Policy
Division	Corporate Governance
BU/Department	Corporate Governance
Branch	National

Purpose

The purpose of the Whistleblowing Policy is to enable our employees to observe or detect improper conduct in our workplace, or our client's premises, and to provide our employees with the ability to safely and confidentially report any Reportable Conduct without fear of reprisals, repercussion or victimisation.

Policy

The Certis Security Australia Whistleblower Policy (**Policy**) and supporting guidelines outline how to report and action any Reportable Conduct. It is the policy of Certis Security Australia to maintain an open working environment for the legitimate reporting by all directors, employees or contractors, of any Reportable Conduct without fear of reprisal. The policy applies to all directors, employees and contractors of Certis Security Australia and its subsidiaries.

Raising questions and concerns reinforces our commitment to act ethically in every business situation. Fearless reporting of Reportable Conduct, and the early detection of potential issues also allows Certis Security Australia to address concerns before they become larger problems, and to take corrective action if necessary. Certis Security Australia is committed to maintaining a culture where all our people are comfortable asking questions, speaking up and working toward solutions.

Certis Security Australia endeavours to:

- encourage our directors, employees and contractors personnel to report instances of actual or suspected Reportable Conduct;
- protect individuals that report actual or suspected Reportable Conduct in good faith from any form of retribution, even if the report made proves to be unfounded;
- treat reports of actual or suspected Reportable Conduct seriously;
- investigate reports promptly, thoroughly and consistently with applicable law;
- take appropriate corrective or disciplinary action for Policy violations;
- treat the identity of the whistleblower as confidential unless the whistleblower indicates (or the law requires) otherwise;
- provide for disclosure or report of Reportable Conduct to be made anonymously. (However, Certis Security Australia strongly encourage individuals making such reports to disclose



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their identity as investigations may be hindered if contact cannot be made with an anonymous whistleblower to obtain clarification or further information);

- keep investigations confidential where practicable subject to law; and
- not tolerate any act of retaliation or victimisation against anyone who makes a report in good faith of actual or suspected Reportable Conduct, or who participates in an investigation.

Certis Security Australia does not tolerate false, vexatious, malicious or frivolous reporting. Appropriate disciplinary action, up to and including termination of employment or engagement, may be taken against employees or contractors who make such reports.

Certis Security Australia will take all reasonable steps to ensure no harassment, or victimisation occurs against anyone who raises a concern in good faith under this Policy or who participates in an investigation. Any such conduct may be regarded as serious misconduct, and may result in disciplinary action, including termination of employment.

Reporting Procedure

Any person who wishes to report actual or suspected Reportable Conduct under this policy is encouraged to first speak to their immediate manager.

If the whistleblower has a concern about reporting to their immediate manager for any reason, they may report to Human Resources or directly through the Whistleblower Report Line, telephone number 1300 797 337, i.e. Mon to Fri between 8am and 6pm, excluding public holidays, or email at certisreportableconduct@fcbgroup.com.au.

The Whistleblower Report Line and email are administered by FCB Workplace Law, a workplace relations specialist engaged on behalf of Certis Security Australia.

All reports made under this Policy will be treated with strict confidentiality.

Reportable Conduct

For the purpose of this Policy, Reportable Conduct means and includes:

- (a) Dishonesty;
- (b) Fraud;
- (c) Theft;
- (d) Corrupt conduct, such as bribery;
- (e) Illegal Acts;
- (f) Accounting Irregularities;
- (g) Malpractice;
- (h) Undeclared conflict of interest (i.e. no proper disclosure of the conflict);



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- (i) A serious breach of a procurement process or other internal Policy;
- (j) Unethical Behaviour;
- (k) Unsafe Work Practices;
- (l) Conduct representative of gross mismanagement, serious and substantial waste and/or a repeated breach of administrative procedures; and
- (m) Any other conduct that may cause Certis Security Australia reputational damage or may cause financial or non-financial loss to Certis Security Australia.

Appendix A to this Policy sets out some examples of Reportable Conduct. This list is not exhaustive.

What is not Reportable Conduct

If an employee has any other concern about conduct involving a staff member, contractor or supplier it can still be reported. If the concern does not relate to Reportable Conduct, it will be referred to Certis Security Australia to review and decide of any further action.

This Policy does not apply to any grievance about a workplace matter, or about employment arrangements (such as pay or rosters). If an employee has a grievance about this type of matter the employee should follow the Grievances Procedure as stated in the Employee Handbook or contact Human Resources.

Information for a disclosure:

- (a) Name and employee number;
- (b) Department or Business Unit/Company;
- (c) Contact number or email address;
- (d) Reportable Conduct type and description of case reported;
- (e) Date, time and location of incident(s);
- (f) Description of the person or people who are alleged to have engaged in the Reportable Conduct; and
- (g) Any supporting evidence; emails, texts, correspondence, documents, photos, video/voice recordings, statements.

A sample of the whistleblowing form (Appendix B) is encouraged to be used for email and post submission as it provides guidance on the kind of information the Whistleblower should include to facilitate any investigation.



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For Handbook, in addition to the Policy include the following:

INVESTIGATION

Upon receipt of a complaint under the Whistleblower Policy, Internal Audit will be notified of the complaint.

An investigation into the Reportable Conduct which is the subject of the complaint will commence. Where appropriate at our discretion, a specialist third party or internal investigator may be appointed to investigate the allegations.

Where appropriate, such as where there is a potential risk to health and safety or where the allegations are sufficiently serious, the person/s alleged to have engaged in the Reportable Conduct may be suspended pending investigation. Where a person is suspended while an investigation takes place, no inference of wrongdoing or assumed guilt will be made.

Where documents, correspondence or other physical evidence or items are provided by the Whistleblower as part of the report, Certis Security Australia will establish a chain of custody to identify and monitor possession.

DISCIPLINARY ACTION

Certis Security Australia may take any disciplinary action against the subject of the Reportable Conduct that it deems to be appropriate, up to and including termination of employment and/or engagement, if the Reportable Conduct is substantiated. In appropriate cases, the matter may be referred to the Police or other agency.

COMMUNICATION

The Whistleblower will be notified of receipt of the complaint by Certis Security Australia, and will be kept informed regarding the progress of the complaint and the investigation as far as is reasonably possible.

When an investigation is finalised, the Whistleblower will be advised. It may be appropriate to inform the Whistleblower of the findings or outcome, subject to any issue of confidentiality, privacy, privilege or ongoing investigation. Any such report will not usually include details of any formal action that may be taken against the person/s who were alleged to have engaged in the Reportable Conduct.

All persons involved in the investigation of a matter under the Policy will be instructed to keep the matter confidential.

CONFIDENTIALITY

Certis Security Australia will endeavour to protect the Whistleblower's identity from disclosure, and will generally not disclose the person's identity unless:

- a) the Whistleblower consents to the disclosure;
 - b) the disclosure is required or authorised by law;
 - c) the disclosure is necessary to further and appropriately investigate the matter;
 - d) the disclosure is necessary to prevent or lessen a serious threat to a person's health or safety;
- and/or



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e) it is necessary to protect or enforce Certis Security Australia's legal rights or interests or to defend any claims.

OTHER

Certis Security Australia may vary, amend or remove this Whistleblower Policy at any time at its complete discretion.

Breach of this Whistleblower Policy may result in disciplinary action, up and including termination of employment.

Certis Security Australia will not tolerate or accept a complaint made where the person who makes the complaint knows it to be false or misleading, or where there is no reasonable or genuine basis for the complaint, or that is otherwise frivolous or vexatious. In such a case, the matter may be referred for disciplinary action.



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Appendix A

Examples of Reportable Conduct Activities

- Accounting irregularities (e.g. overstating revenue and understating costs)
- Forgery or unauthorised alteration of any document or form of Certis Security Australia , such as forging authorised approver's/signatory's signatures, amending any official documents after approvals have been obtained
- Forgery or alteration of cheque, bank draft, or any other financial/bank document
- Misappropriation of cash, funds, securities, supplies, inventories, operating equipment or other assets
- Impropriety in the handling or reporting of money or financial transactions
- Obtaining or planning to obtain any benefit as a result of use of confidential information of Certis Security Australia 's activities or non-disclosure of conflict of interest in pertinent circumstances
- Theft of company's assets including but not limited to money, property, trade secrets or intellectual property
- Use of position or authority for personal gain
- Disclosure of confidential and/or sensitive information to unauthorised persons or external parties
- Engagement or awarding of commercial contracts to relatives or friends of a Certis employee, without proper disclosure of this relationship.
- Conflicts of interest (e.g. accepting or seeking anything of material value from vendors or suppliers in exchange of awarding of contracts to them)
- Sabotage or planned sabotage of Certis Security Australia's IT Systems
- Unsafe work practices in breach of work health and safety obligations

Note:

This list is not exhaustive and serves as a guide only.



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Appendix B

Strictly Confidential

Report Of Actual Or Suspected Reportable Conduct(s)

Please use this form when submitting a report of actual or suspected reportable conduct(s)

(Please read the Whistleblowing Policy carefully before completing the form)

1. Your Contact Details

Name & Employee No. : _____

Department or Business Unit/
Company : _____

Preferred Contact No. or Email
Address : _____

2. Disclosure Details

Reportable conduct type :

<input type="checkbox"/> Dishonesty	<input type="checkbox"/> A serious breach of a procurement process or other Policy
<input type="checkbox"/> Fraud	<input type="checkbox"/> Unethical behaviour
<input type="checkbox"/> Theft	<input type="checkbox"/> Unsafe work practices
<input type="checkbox"/> Corrupt conduct (i.e. bribery)	<input type="checkbox"/> Gross mismanagement, serious and substantial waste and/or repeated breach of administrative procedures
<input type="checkbox"/> Illegal Acts	
<input type="checkbox"/> Accounting Irregularities	
<input type="checkbox"/> Malpractice	<input type="checkbox"/> Conduct which may bring the company into disrepute / cause loss
<input type="checkbox"/> Undeclared conflict of interest	

Particulars of staff(s) who committed the actual or suspected reportable conduct(s).

Name(s) : _____

Department(s) : _____

Please provide details of the incident(s) including the date, time and location where the incident(s) happened. Please also state if there was any loss of monies and/or assets. Attach additional pages, evidence or documentation if necessary.

Please send the completed form to certisreportableconduct@fcbgroup.com.au.