



## Whistle-blower Policy

Version 1.0

### ABSTRACT

Outlines the conditions and obligations of Southern Cross Group Pty Ltd.'s (SCG) management & employees' making a protected disclosure.

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<b>Controlled By:</b>		Archie Petsas Head of People & Culture			

## Contents

1. SCOPE OF THE POLICY .....	3
2. COMPANY'S COMMITMENT.....	3
3. ELIGIBILITY .....	4
4. PRINCIPLES OF THIS POLICY .....	4
5. GREVIANCE PROCEDURE .....	4
6. PROTECTION .....	5
7. REFERENCE.....	5

## 1. SCOPE OF THE POLICY

This policy is an extension of the Southern Cross Group's Code of Conduct, it requires all employees and representatives of Southern Cross Group (SCG) to practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

This policy details the rights of staff and other people who have dealings with Southern Cross Group to disclose improper conduct confidentially, anonymously, in good faith and on reasonable grounds without the fear of reprisal or detrimental action.

Improper conduct includes:

- A breach of the Southern Cross Group Code of Conduct;
- Unethical or improper conduct;
- Financial malpractice, impropriety or fraud;
- Contravention or suspected contravention of legal or regulatory provisions;
- Auditing non-disclosure or manipulation of any audit processes;
- corruption, bribery or blackmail;
- criminal offences;
- miscarriage of justice;
- endangering the health and safety of an individual; and
- Any deliberate concealment relating to the above.

## 2. COMPANY'S COMMITMENT

This policy documents the commitment of the Executive Management of Southern Cross Group Pty Ltd and its subsidiaries ("Southern Cross Group") to maintaining an open working environment in which employees and contractors ("staff") observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

The purpose of this Whistle-blower Policy is to encourage employees, suppliers, contractors, customers, tenderers or other any person who has business dealings with Southern Cross Group to raise any concerns and report instances of illegal, fraudulent or unethical conduct, where there are reasonable grounds to suspect such conduct, without fear of intimidation, disadvantage or reprisal.

The Company believes in the conduct of the affairs of its constituents in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity and ethical behaviour

### 3. ELIGIBILITY

Southern Cross Group encourages staff to address their questions, concerns, suggestions or complaints by initially discussing the matter with their line manager or alternatively, another senior manager or member of the People & Culture team.

The Southern Cross Group Code of Conduct also outlines avenues through which staff can make disclosures.

Anyone else who has business dealings with Southern Cross Group can report disclosures of improper conduct to the CEO or one of his direct reports of the relevant business area, or, if preferred, a Protected Disclosure Officer, being:

The Head of People & Culture, who is currently Archie Petsas and can be contacted by email at [archie.petsas@scgroup.global](mailto:archie.petsas@scgroup.global)

Anyone who does not feel comfortable making disclosures via the above channels, or who wishes to remain anonymous may contact Southern Cross Group's independent and confidential whistle-blower service (the Southern Cross Group Hotline) at:

Email [whistleblower.link@scgroup.global](mailto:whistleblower.link@scgroup.global)  
Web <https://scgroup.global/whistle-blower/>

All disclosures under this policy will be treated in the strictest confidence.

### 4. PRINCIPLES OF THIS POLICY

- All concerns raised will be treated fairly and properly.
- We will not tolerate the harassment or victimization of anyone raising a genuine concern.
- Any individual making a disclosure will retain their anonymity unless they agree otherwise.
- We will ensure that any individual raising a concern is aware of who is handling the matter.
- We will ensure no one will be at risk of suffering some form of retribution as a result of raising a concern even if they are mistaken. We do not however extend this assurance to someone who maliciously raises a matter they know to be untrue.

### 5. GREVIANCE PROCEDURE

SCG will investigate all disclosures of improper conduct made under this policy as soon as possible after receipt of the disclosure. The investigation will be conducted in a timely, thorough, confidential, objective and impartial manner, recognising the principles of natural justice, procedural fairness and best practice investigative techniques. Complainants, where possible, will be provided with feedback regarding the investigation's outcome.

The Head of People & Culture is responsible for determining the scope of, and resources applied to each investigation.

Employees, who have raised concerns, will be informed of who is handling the matter, how they can make contact with them and if there is any further assistance required. We will give as much feedback as we can without any infringement on a duty of confidence owed by us to someone else.

## 6. PROTECTION

Southern Cross Group commits to absolute confidentiality and fairness in all matters raised under this Policy.

The protection of individuals who make disclosures in good faith and on reasonable grounds from victimisation, adverse reaction or intimidation is of utmost importance. SCG will ensure that such individuals will not be disadvantaged in their employment or dealings with Southern Cross Group.

Additionally, The Corporations Act 2001 protects a whistle-blower against civil or criminal litigation (including a case for breach of contract) for protected disclosures. However, if the whistle-blower is the subject of an action for disclosing protected information, they may rely on this protection in their defence.

Employees' identities will not be disclosed without prior consent. Where concerns are unable to be resolved without revealing the identity of the employee raising the concern, (e.g. if their evidence is required in court), we will enter in to a dialogue with the employee concerned as to whether and how we can proceed.

If you are unsure whether to use the procedure or you want independent advice at any stage, you may contact the Australian Security and Investments Commission (ASIC) or a lawyer.

However, Serious or material disclosures are escalated as required.

On a regular basis, disclosures and the results of investigations will be reported within Southern Cross Group to the Management Team and the CEO. In general, these reports will, on a "no names basis", provide a summary of disclosure and investigation reports, identify any patterns of conduct and make recommendations.

## 7. REFERENCE

<http://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/guidance-for-whistleblowers/>

<https://www.legislation.gov.au/Details/C2017C00328>