

Applies to:	All Intereach workers, including employees, contractors and volunteers, Family Day Care educators and all eligible persons who wish to report or have reported Reportable Conduct regarding Intereach’s company activities. Please see the definition of ‘Eligible Person’ within the Appendix.				
Definitions:	Refer to Appendix - Schedule of Definitions				
Version:	2.0	Date approved:	26/10/2023	Next review date:	26/10/2026

1. Policy Statement

At Intereach, our Code of Conduct and Intereach Fundamentals emphasise our commitment to upholding the highest standards of conduct and ethical behaviour in all aspects of our business. We are committed to fostering a culture where an employee feels safe to speak up on matters that concern them and to promoting and supporting a culture of honest and ethical behaviour, corporate compliance, and good corporate governance.

This Policy is available on Intereach’s website at www.intereach.com.au to ensure accessibility by potential disclosers both within and outside of Intereach.

This Policy is not in any way incorporated into any employee’s contract of employment.

2. Objective

People who have a working relationship with Intereach are often the first to realise that there may be something seriously wrong, however they may not wish to speak up for fear of appearing disloyal, concerns about being victimised or being subject to reprisals for reporting wrongdoing.

The objective of this Policy is to:

- assist to create a culture within Intereach that encourages our people to speak up;
- encourage the reporting of Reportable Conduct that may cause harm to individuals or financial and non-financial damage to Intereach;
- ensure individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported;
- ensure disclosures are dealt with appropriately and on a timely basis;
- provide transparency around the Intereach framework for receiving, handling, and investigating Reportable Conduct;
- establish processes for protecting Whistleblowers against reprisal by any person internal or external to Intereach;
- explain the processes for reporting Reportable Conduct, including what happens when a Whistleblower makes a report;
- support Intereach Fundamentals, values and Code of Conduct to help ensure Intereach maintains the highest standards of ethical behaviour and integrity;
- support the long-term sustainability and reputation of Intereach;
- provide employees with help to deter wrongdoing, in line with the Intereach risk management and Governance Framework;
- meet the legal and regulatory obligations of Intereach; and

- outline the special procedures and protections that apply to Whistleblowers under the Corporations Act 2001 (Cth) (Corporations Act) and Tax Administration Act 1953 (Cth)(Taxation Administration Act) in relation to reporting of possible breaches of the Corporations Legislation or Misconduct in relation to the Company's tax affairs (as applicable).

3. Guidelines

3.1. What is Reportable Conduct

The scope of this Policy relates to any known, suspected, or potential case of conduct that is reportable to Intereach. Reportable Conduct in the context of this policy means:

- conduct that is illegal, unacceptable, or undesirable, or the concealment of such conducts. It includes conduct that:
 - is against the law or is a failure by Intereach to comply with any legal obligations (such as theft, violence, harassment or intimidation, criminal damage to property or other breaches of the law);
 - is dishonest, fraudulent, or corrupt (such as misappropriation of funds, corruption, offering or accepting a bribe);
 - is unethical or breaches any internal policies (including the Code of Conduct) (such as dishonestly altering company records or data);
 - is coercion, harassment, victimisation, discrimination, or bullying, other than Personal Work-Related Grievances;
 - is misleading or deceptive conduct of any kind (including conduct or representations which amount to improper or misleading accounting or financial reporting practices either by, or affecting, Intereach);
 - is potentially damaging to Intereach, an employee, Whistleblower or a third party, including unsafe work practices, environmental damage, health risks or substantial wasting of company resources;
 - may cause financial loss to Intereach or damage its reputation or be otherwise detrimental to Intereach; or
 - involves any other serious impropriety.
- information which the Eligible Person has reasonable grounds to suspect indicates Misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of Intereach or its associates or which may assist the Commissioner of Taxation or an Eligible Tax Recipient to perform his or her functions or duties under taxation law in relation to Intereach;
- concerns Misconduct, or an improper state of affairs or circumstances, in relation to Intereach; or
- indicates that the Company or any of its officers or employees has engaged in conduct that:
 - constitutes an offence against, or contravention of, a provision of any Corporations Legislation;
 - constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or longer; or
 - represents a danger to the public or the financial system.

3.2. Out of scope – Personal Work-Related Grievances

Reportable Conduct does not include ‘Personal Work-Related Grievances’, unless:

- it includes information about Misconduct, or information about Misconduct includes or is accompanied by a Personal Work-Related Grievance (i.e. a mixed report);
- Intereach has breached employment or other laws punishable by imprisonment for a period of 12 months or more, engaged in conduct that represents a danger to the public, or the disclosure relates to information that suggests Misconduct beyond an Eligible Person’s personal circumstances;
- the Eligible Person suffers from or is threatened with detriment for making a disclosure; or
- the Eligible Person seeks legal advice or legal representation about the operation of the whistleblower protections under the Corporations Act.

Personal Work-Related Grievances may include (without limitation):

- an interpersonal conflict between a Whistleblower and another employee;
- a decision that does not involve a breach of workplace laws;
- a decision about the engagement, transfer, or promotion of a Whistleblower;
- a decision about the terms and conditions of engagement of a Whistleblower; or
- a decision to suspend or terminate the engagement of a Whistleblower, or otherwise to discipline a Whistleblower that is unrelated to the disclosure.

From time to time an employee may have a complaint that is not Reportable Conduct or a breach of the Intereach rules or policies. If an employee has a complaint about a Personal Work-Related Grievance, service issue or policy decision or they wish to raise a grievance issue, they should refer to the Code of Conduct Policy or speak to their manager, the relevant committee, or Human Resources’ contact person.

3.3. How to make a disclosure

An Eligible Person must report the Reportable Conduct to an Eligible Recipient (see section 3.5 for a list of Eligible Recipients) in order to qualify for protection under this Policy. An Eligible Person who wishes to seek additional information before formally making a disclosure can obtain additional information by contacting a Whistleblower Protection Officer (WPO) or seek independent legal advice.

Any such report should where possible be in writing and should contain, as appropriate, details of:

- the nature of the alleged breach;
- the person or persons responsible for the breach;
- the facts on which the Whistleblower’s belief that a breach has occurred, and has been committed by the person named, are founded; and
- the nature and whereabouts of any further evidence that would substantiate the complainant’s allegations, if known.

Disclosures can be made to an Eligible Recipient via letter, email or phone and the contact details can be found in the Intereach Phonebook.

Alternatively, an Eligible Person may contact our external independent third party authorised Eligible Recipient, **Emverio Workplace Complaints**, a division of Acacia to disclose under this policy through the below options:

- By phone: 1300 454 574 between 7.00 am and 8.00 pm (Australian Eastern Standard Time) Monday to Friday (excluding public holidays - reduced hours during holiday periods);
- by email: info@complaints.emverio.com
- in writing: PO Box 1110 Spring Hill QLD 4000
- or via the Web: www.workplacecomplaint.com

3.4. Anonymity

An Eligible Person may choose to remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised. If a Whistleblower does not share their identity, Intereach will assess the Protected Disclosure in the same way as if the identity had been revealed. There may be some practical limitations in conducting the investigation if the Whistleblower does not share their identity. Accordingly, an anonymous Whistleblower should maintain ongoing two-way communication with the Company to allow for follow-up questions or feedback to occur.

By way of suggestion only, Protected Disclosures can be made anonymously if preferred by:

- communicating the Protected Disclosure through an anonymised email address; or
- adopting a pseudonym for the purpose of the Protected Disclosure (if appropriate).

While the Company will not investigate the identity of a Whistleblower of an anonymous Protected Disclosure, it is the Whistleblower's obligation to manage their anonymity in submitting a Protected Disclosure anonymously, including by expressly stating in their disclosure that the Protected Disclosure is being made on an anonymous basis. Neither the Company, its officers, or employees nor a WPO shall be liable if the Whistleblower's identity is, or becomes, readily ascertainable.

For external complaints lodged via Emverio Workplace Complaints an anonymous complaint can be made, however, Emverio must obtain consent from you before disclosing information to Intereach. This could be information surrounding the complaint, the Department or section you work in, and names of the people involved. Eligible Persons need to understand that even if they lodge an anonymous complaint, the circumstances may be such that they can be identified, and anonymity may be difficult to maintain.

3.5. Who can receive a Reportable Conduct

Intereach has several channels for making a report if an Eligible Person becomes aware of any issue or behaviour which is considered to be Reportable Conduct.

Eligible Persons can report Reportable Conduct to:

- their direct supervisor or manager;
- if they feel that the supervisor or manager may be complicit in the breach or feels unable to raise the Reportable Conduct with their supervisor or manager, the Chief Executive Officer;
- if they feel that the Chief Executive Officer may be complicit in the breach or feels unable to raise the Reportable Conduct with the Chief Executive Officer, any other senior manager or one of the WPOs (Whistleblower Protection Officer) identified below in this section 3.53.6 of the Policy;

- an auditor, or a member of the audit team conducting the audit, of Intereach; and
- a director or company secretary of Intereach.

Disclosable Corporate Matters may also be reported to an actuary of Intereach, Australian Securities and Investments Commission (ASIC) or Australian Prudential Regulation Authority (APRA). Reports can be submitted to these parties through the respective party's website.

Disclosable Tax Matters may also be reported to:

- the Commission of Taxation Reports through the ATO website;
- a registered tax agent or BAS agent who provides tax agent services or BAS services to Intereach; or
- any other employee or officer of Intereach who has functions or duties that relate to the tax affairs of Intereach.

Eligible Persons may also disclose information to a Legal Practitioner only for the purpose of obtaining legal advice or legal representation in respect of the application of the whistleblower regime under the Corporations Act to the Reportable Conduct.

If an Eligible Person is in doubt about to whom they may report Reportable Conduct, the Eligible Person should consider contacting an independent legal adviser prior to making such disclosures.

3.6. Whistleblower Protection Officers

In addition to the above parties, Intereach has also nominated the following roles as a WPO who can be contacted as follows:

Name: Robert Phillips
phone: 0434 730 759
email: robertp@intereach.com.au
post: PO Box 131, Albury NSW 2640

Name: Leisha East
phone: 0419 411 520
email: leishae@intereach.com.au
post: PO Box 501, Deniliquin NSW 2710

Name: Alex Bull
phone: 0417 345 053
email: alex.bull@intereach.com.au
post: PO Box 501, Deniliquin NSW 2710

The role of the WPO is to:

- provide mentoring and support;
- protect the Whistleblower from Detrimental Conduct;
- assist the Whistleblower in maintaining their wellbeing;
- assess each report to determine whether it qualifies for protection;
- assess each report to determine whether a formal, in-depth investigation is required;
- coordinate the investigation into any report received from a Whistleblower;
- document and handle all matters in relation to the report and investigation;

- keep the Whistleblower informed of the progress and outcomes of the inquiry/investigation subject to considerations of privacy of those against whom the disclosure has been made; and
- finalise all investigations.

The WPO must have a direct reporting line to an Executive Leader from an area of the organisation that is independent of management in the area that is the subject of the report of wrongdoing. If the WPO decides that a formal investigation is required, the Whistleblower will be notified (if contact details have been provided) of the decision within 10 business days of the decision being made. Please note that the timeframe for this may vary depending on the nature of the report.

3.7. Confidentiality

Intereach is committed to ensuring confidentiality in respect of all matters raised under this Policy, and that those who make a report are treated fairly and do not suffer detriment.

All information received from a Whistleblower will be treated confidentially and sensitively. A Whistleblower can refuse to answer questions that may lead to the identification of the Whistleblower's identity at any time, including during follow-up conversations.

To protect the identity of a Whistleblower, Intereach will ensure that:

- all personal information or reference to the Whistleblower witnessing a Reportable Conduct will be redacted;
- the Whistleblower will be referred to in a gender-neutral context;
- if and where possible, the Whistleblower will be contacted to help identify aspects of their disclosure that could inadvertently identify them;
- disclosures will be handled and investigated by qualified recipients;
- all paper and electronic documents and other materials relating to the disclosures will be stored securely;
- only a restricted number of qualified recipients will be made aware of a Whistleblower's identity (subject to the Whistleblower's consent) or information that is likely to lead to the identification of the Whistleblower; and
- each qualified recipient involved in handling and investigating a disclosure will be reminded about the Company's confidentiality policy, including that any unauthorised disclosure of a Whistleblower's identity may be a criminal offence.

If a Whistleblower makes a disclosure, the identity (or any information which would be likely to identify the Whistleblower) will only be shared if:

- the Whistleblower gives consent to share that information; or
- the disclosure is allowed or required by law.

Intereach may disclose your identity, or information likely to identify your identity, without your consent to:

- ASIC, APRA, Commissioner of Taxation, or a member of the Australian Federal Police in the course of reporting the Protected Disclosure to those authorities; and
- a Legal Practitioner to the extent required to obtain legal advice or legal representation in respect of the application of the whistleblower regime under the Corporations Act to the Protected Disclosure.

In addition, in the case of information likely to identify the Whistleblower, if it is reasonably necessary to share the information for the purposes of an investigation:

- all reasonable steps should be taken to reduce the risk that they will be identified;
- all files and records created from an investigation will be retained securely; and
- unauthorised release of information to someone not involved in the investigation (other than senior managers or directors who need to know to take appropriate action, or for corporate governance purposes) without the Whistleblower's consent will be a breach of this Policy.

Apart from the exceptions indicated above, it is illegal for any person to identify a Whistleblower or disclose information that is likely to lead to the identification of the Whistleblower. If there is a breach of confidentiality from any persons within the Company, the Whistleblower can lodge a complaint with the Company or with a regulator, such as ASIC, APRA or the ATO, for investigation.

3.8. Support and Practical Protection for Disclosers

3.8.1. Protection from Detrimental Conduct:

Intereach is committed to ensuring that those who make a report are treated fairly and do not suffer from any Detrimental Conduct or threat of Detrimental Conduct, as a result of a belief or suspected belief, that the Whistleblower has made, may have made, proposes to make or could make, a Protected Disclosure that qualifies for protection. A threat can be express, implied, conditional or unconditional, and does not require actual fear that the threat will be carried out.

To ensure that a Whistleblower is protected from Detrimental Conduct, Intereach will ensure that:

- the process for assessing the risk of detriment against a Whistleblower and other persons will commence as soon as possible after receiving a disclosure;
- support services will be made available to the Whistleblower (if requested and available);
- strategies will be provided to the Whistleblower to help minimise and manage stress, time or performance impacts, or other challenges resulting from the disclosure or its investigation;
- modifications to workplace arrangements are available to the Whistleblower if necessary to protect the Whistleblower from risk of detriment;
- management is made aware of its responsibilities to maintain the confidentiality of a disclosure, address the risks of isolation or harassment, manage conflicts, and ensure fairness when managing the performance, or taking other management action relating to, a Whistleblower;
- any complaint lodged by a Whistleblower will be investigated as a separate matter by an officer who is not involved in dealing with disclosures and the investigation findings will be provided to the Board; and
- if a detriment has occurred to the Whistleblower, compensation or other non-monetary remedies will be made available to the Whistleblower.

If the Whistleblower suffers any Detrimental Conduct as a result of making a report under this Policy, the Whistleblower should immediately:

- inform a senior manager within his or her relevant business unit;
- inform a WPO; or
- seek independent legal advice.

3.9. General protections:

A Whistleblower that reports Reportable Conduct under this Policy must not be personally disadvantaged by dismissal, demotion, any form of harassment, discrimination of current or future bias or unfavourable treatment as a result of submitting a Protected Disclosure.

If a Whistleblower is subjected to unfavourable treatment as a result of submitting a Protected Disclosure, the Whistleblower should inform a WPO immediately.

Compensation and other remedies may be sought if:

- they suffer loss, damage, or injury because of the Reportable Conduct; and
- Intereach failed to take reasonable precautions and exercise due diligence to prevent the Detrimental Conduct.

Whistleblowers are protected from:

- civil liability (e.g. any legal action against the discloser for breach of an employment contract, duty of confidentiality or another contractual obligation);
- criminal liability (e.g. attempted prosecution of the discloser for unlawfully releasing information, or other use of the disclosure against the discloser in a prosecution (other than for making a false disclosure)); and
- administrative liability (e.g. disciplinary action for making the disclosure), however, these protections do not grant immunity for any Misconduct a Whistleblower has engaged in that is revealed in connection with the Protected Disclosure.

As a current employee (or an immediate family member thereof), the Whistleblower may also access the Intereach confidential counselling service, Employee Assistance Program.

3.10. Protection under the Corporations Legislation:

The Corporations Act provides additional protections in relations to the reporting of Disclosable Corporate Matters. A disclosure of a Disclosable Corporate Matter by an Eligible Person qualifies for protection under the Corporations Act if:

- the report is made to an Eligible Recipient; and
- the report is in respect of a Disclosable Corporate Matter. Please note that the scope of Disclosable Corporate Matters is more limited than the scope of Reportable Conduct.

If these conditions are met, the Corporations Act provides the following protections to the Whistleblower:

- The Whistleblower is not subject to any civil, criminal, or administrative liability (including disciplinary action) for making the Protected Disclosure. The Whistleblower is not, however, protected from civil, criminal, or administrative liability for any of its conduct, which may be revealed in connection with the Protected Disclosure.
- No contractual or other remedy may be enforced or exercised against a Whistleblower as a penalty for making the Protected Disclosure, and a contract to which the Whistleblower is

party may not be terminated on the basis that the Protected Disclosure constitutes a breach of the contract.

- If the Protected Disclosure is reported to Eligible Corporate Recipients, Journalists or Parliamentary Members in accordance with this Policy, the Protected Disclosure is not admissible in evidence against the Whistleblower in criminal proceedings or in proceedings for the imposition of a penalty, other than proceedings in respect of the falsity of the Protected Disclosure.
- Anyone who causes, or threatens to cause, detriment to the Whistleblower because of their belief or suspicion that the Whistleblower has made, proposes to make or is entitled to make a Protected Disclosure may be guilty of an offence and liable for damages due to the Whistleblower.
- Subject to limited exceptions summarised in this Policy, the person to whom the Protected Disclosure is made must not disclose the substance of the Protected Disclosure, the Whistleblower's identity or information is likely to lead to identification of the Whistleblower.

3.11. Protection under the Taxation Administration Act:

The Taxation Administration Act provides additional protections in relations to the reporting of Disclosable Tax Matters. A disclosure of a Disclosable Tax Matter by an Eligible Person qualifies for protection under the Taxation Administration Act if:

- the Disclosable Tax Matter is reported to the relevant Eligible Recipient; and
- the report is in respect of a Disclosable Tax Matter. Please note that the scope of Disclosable Tax Matters is more limited than the scope of Reportable Conduct.

If these conditions are met, the Taxation Administration Act provides the following protections to the Whistleblower:

- the Whistleblower is not subject to any civil, criminal or administrative liability (including disciplinary action) for making the Protected Disclosure. The Whistleblower is not, however, protected from civil, criminal or administrative liability for any of its conduct, which may be revealed in connection with the Protected Disclosure;
- no contractual or other remedy may be enforced or exercised against a Whistleblower as a penalty for making the Protected Disclosure, and a contract to which the Whistleblower is party may not be terminated on the basis that the Protected Disclosure constitutes a breach of the contract;
- if the Disclosable Tax Matter is reported to the Commissioner of Taxation, the Protected Disclosure is not admissible in evidence against the Whistleblower in criminal proceedings or in proceedings for the imposition of a penalty, other than proceedings in respect of the falsity of the Protected Disclosure;
- anyone who causes, or threatens to cause, detriment to the Whistleblower because of their belief or suspicion that the Whistleblower has made, proposes to make or is entitled to make a Protected Disclosure may be guilty of an offence and liable for damages due to the Whistleblower; and
- subject to limited exceptions summarised in this Policy, the person to whom the Protected Disclosure is made must not disclose the substance of the Protected Disclosure, the Whistleblower's identity or information is likely to lead to identification of the Whistleblower.

3.12. External Whistleblowers:

Intereach will endeavour to support a Whistleblower, but it will not be able to provide the same practical support to a non-employee that it provides to current employees. Therefore, the processes in this Policy will be adapted and applied to the extent reasonably possible to support to a non-employee Whistleblower.

4. Handling and investigating a disclosure

4.1. Investigator

The Investigator is the relevant Eligible Recipient or WPO to whom the Whistleblower has disclosed the Protected Disclosure. Intereach will investigate all matters reported under this Policy as soon as practicable after the matter has been reported and all reports of alleged or suspected wrongdoing made under this Policy to an Eligible Recipient will be properly assessed to determine whether the disclosure falls within the intended scope of this Policy.

All Protected Disclosures will be investigated by a WPO on a timely basis and to the extent possible based on the details provided with the Protected Disclosure. Appropriate corrective action will be taken as warranted by the investigation and as determined by the Board in its sole discretion.

Intereach recognises that individuals against whom an allegation is made must also be supported during the handling and investigating of the wrongdoing report. Intereach will take reasonable steps to treat fairly any person who is the subject of a disclosure, particularly during the assessment and investigation process in accordance with an established support protocol which may extend to include appointing an independent senior officer in Intereach to provide support.

4.2. If the disclosure does not fall within the scope of this Policy:

- Where a person is identified as being suspected of possible wrongdoing, but preliminary inquiries determine that the suspicion is baseless or unfounded and that no formal investigation is warranted, then the Whistleblower will be informed of this outcome (if contact details have been provided) and the matter will be considered to be resolved.
- The relevant Eligible Recipient will decide whether the person named in the allegation should be informed that a suspicion was raised and found to be baseless upon preliminary review. In making this decision, the Eligible Recipient will take into consideration the desire to preserve the integrity of a person so named, to enable workplace harmony to continue unfettered, and the protection of the Whistleblower where it is a bona fide disclosure.

4.3. If the disclosure falls within the scope of this Policy:

- The Investigator will carry out a preliminary review to determine whether the allegations raised should then be investigated.
- Not all disclosures will necessarily lead to an investigation. They will be assessed and a decision made as to whether they should be investigated. For example, it may be decided that the allegations have been investigated previously and do not require a new investigation.
- While the particular investigation process will be determined by the nature and substance of the Protected Disclosure, where a Protected Disclosure has not been made

anonymously the Investigator will contact the Whistleblower to discuss the investigation process including who may be contacted and other relevant matters.

- Where a report is submitted by a Whistleblower anonymously, Intereach will conduct the investigation and its enquiries based on the information provided during the initial disclosure.
- Where an investigation is conducted, but does not substantiate the reported disclosure:
 - the fact that the investigation has been carried out, the results of the investigation and the identity of the person who is the subject of the report must be handled confidentially; and
 - Intereach will give its full support to a person who is the subject of a disclosure where the allegations contained in the disclosure are clearly wrong.
- is informed of the substance of the allegations;
 - is given a fair and reasonable opportunity to answer the allegations before the investigation is finalised;
 - has their response set out fairly in the Investigator's report;
 - is informed about the substance of any adverse conditions in the investigators report that affects them;
 - where adverse conclusions are made by an Investigator's report about a person, that person has a right to respond to those conclusions prior to any action being taken by Intereach against them;
 - the report will include findings on the allegations and a summary of the evidence on which the findings are based;
- to the extent permitted under applicable laws, Intereach will provide feedback to the Whistleblower regarding the investigations progress and outcome, subject to considerations of the privacy of those against whom allegations have been made; and
- any report will remain the property of Intereach and will be retained under strict security.

4.4. Protection of files and records

All files and records created for the investigation will be retained under strict security. Access to information relating to a Protected Disclosure will be limited to those authorised to manage and investigate the matter. As indicated in this Policy, all identification information associated with the disclosure and outcomes from the investigation will be redacted and amended to reduce the chance of inadvertent disclosures.

The method for documenting and reporting the investigation may vary depending on the nature of the disclosure. Accordingly, it may be inappropriate to provide details of the outcome to the Whistleblower.

The unauthorised release of information without the Whistleblower's consent to any person not involved in the investigation (other than any relevant internal body or committee) is a breach of this Policy, subject to any requirements of applicable law, and will be dealt accordingly by the Board.

4.5. Updates and information to Whistleblowers

Intereach will provide regular updates to the Whistleblower (if they can be contacted). The frequency of these updates will vary, at the investigator's discretion, depending on the nature of the disclosure. Depending on the nature of the Reportable Conduct, it may be inappropriate for

Intereach to provide details of the outcome from the investigation of Reportable Conduct to the Whistleblower.

4.5.1 Ensuring fair treatment of individuals mentioned in a disclosure

Intereach will ensure the fair treatment of its employees who are mentioned in a Protected Disclosure that qualifies for protection, including those who are the subject of a Protected Disclosure. Intereach will ensure that:

- disclosures are handled confidentially when it is practical and appropriate in the circumstances;
- each disclosure is assessed and may be the subject of a formal in-depth investigation;
- the objective of an investigation is to determine whether there is enough evidence to substantiate or refute the matters reported;
- when an investigation needs to be undertaken, the process will be objective, fair and independent;
- an employee who is the subject of a disclosure will be advised about the subject matter of the disclosure as and when required by principles of natural justice, procedural fairness, and prior to any actions being taken; and
- an employee who is the subject of a disclosure may contact Intereach support services.

While the processes and form of investigation to be adopted by the WPO will depend on the substance and nature of each Protected Disclosure, the WPO will take all reasonable steps to initially conduct the investigations independently of the subject of the allegations. To the extent that a Protected Disclosure is not anonymous, the WPO will endeavour to discuss the investigation process (in full or in part, as appropriate to the circumstances) with the Whistleblower.

4.6. Breach of Policy

Intereach will not tolerate any retaliatory action or threats of retaliatory action against a Whistleblower, a Whistleblower's colleagues, employer (if a contractor, consultant, or supplier) or relatives. Any such retaliatory action or victimisation in reprisal for a disclosure made under this Policy will be treated as serious misconduct and will result in disciplinary action, which may include dismissal in accordance with the Disciplinary and Dismissal Policy.

Where it is found that a Whistleblower has knowingly made a false report it may be a breach of the Intereach [Code of Conduct](#) and will be considered a serious matter that may result in disciplinary action in accordance with the Disciplinary and Dismissal Policy. In some circumstances an individual may also be exposed to criminal or civil liability for a breach of the relevant legislation.

It's important to note that the submission of a false report could have significant effects on the Company's reputation and the reputations of its directors, officers and employees and could also cause considerable waste of resources.

Notwithstanding the above, an Eligible Person can still qualify for protection and will not be penalised if the information turns out to be incorrect. However, the Eligible Person must not make a report you know is not true or is misleading.

5. Policy context: this policy relates to:	
5.1. Legislation or other requirements	<p>Corporations Act 2001 (Cth)</p> <p>Australian Securities and Investments Commission Act 2001 (Cth)</p> <p>Banking Act 1959 (Cth)</p> <p>Financial Sector (Collection of Data) Act 2001 (Cth)</p> <p>Insurance Act 1973 (Cth)</p> <p>Life Insurance Act 1995 (Cth)</p> <p>National Consumer Credit Protection Act 2009 (Cth)</p> <p>Superannuation Industry (Supervision) Act 1993 (Cth)</p> <p>Tax Administration Act 1953 (Cth)</p> <p>ASX, "Corporate Governance Principles and Recommendations", 4th Edition</p> <p>ASIC Regulatory Guide 270, NOV 2019, "<i>Whistleblower policy</i>"</p> <p>Privacy Act 1988 (Cth)</p>
5.2. Internal documents	<p>Code of Conduct Policy</p> <p>Disciplinary and Dismissal Policy</p> <p>Privacy Policy</p> <p>Workplace monitoring Policy</p> <p>Governance Framework</p> <p>People and Culture Framework</p> <p>Risk Management Framework</p> <p>Intereach Fundamentals</p>

6. Document control			
Version	Date approved	Approved by	Next review date
1.0	10 June 2020	Leadership Governance Group	10 June 2023
2.0	26 October 2023	Board	26 October 2026

Appendix - Schedule of Definitions

Board means the board of directors of the Company.

Corporations Legislation means the:

- (a) Corporations Act;
- (b) Australian Securities and Investments Commission Act 2001 (Cth);
- (c) Banking Act 1959;
- (d) Financial Sector (Collection of Data) Act 2001;
- (e) Insurance Act 1973;
- (f) Life Insurance Act 1995;
- (g) National Consumer Credit Protection Act 2009;
- (h) Superannuation Industry (Supervision) Act 1993; and
- (i) any instrument made under an Act referred above.

Detrimental Conduct includes:

- (a) dismissal of an employee;
- (b) injury of an employee in his or her employment;
- (c) alteration of an employee's position or duties to his or her disadvantage;
- (d) discrimination between an employee and other employees of the same employer;
- (e) harassment or intimidation of a person;
- (f) harm or injury to a person, including psychological harm;
- (g) damage to a person's property;
- (h) damage to a person's reputation;
- (i) damage to a person's business or financial position; or
- (j) any other damage to a person, and

examples of actions that are **not** Detrimental Conduct include:

- (k) administrative action that is reasonable for the purpose of protecting a discloser from detriment; and
- (l) managing a discloser's unsatisfactory work performance, if the action is in line with the Company's performance management framework.

Disclosable Corporate Matter means information:

- (a) that the Eligible Person has reasonable grounds to suspect:
 - (i) concerns Misconduct, or an improper state of affairs or circumstances, in relation to Intereach; or
 - (ii) indicates that Intereach or any of its officers or employees or any of its officers or employees has engaged in conduct that:
 - (A) constitutes an offence against, or contravention of, a provision of any Corporations Legislation;
 - (B) constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or longer; or
 - (C) represents a danger to the public or the financial system; or
- (b) prescribed by the Corporations Regulations as a 'disclosable matter' for the purposes of section 1317AA(5) of the Corporations Act.

Disclosable Tax Matter means:

- (a) where the information is to be disclosed to the Commissioner of Taxation, information which the Eligible Person considers may assist the Commissioner of Taxation to perform his or her functions or duties under taxation law in relation to Intereach; or
- (b) where the information is to be disclosed to an Eligible Tax Recipient, information which the Eligible Person:
 - (i) has reasonable grounds to suspect indicates Misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of Intereach or its respective associates; and
 - (ii) considers may assist the Eligible Tax Recipient to perform his or her functions or duties under taxation law in relation to Intereach or its respective associates.

Eligible Corporate Recipient means:

- (a) ASIC; or
- (b) APRA; or
- (c) a Commonwealth authority prescribed for this purpose under the Corporations Act.

Eligible Person means an individual who is, or has been, any of the following:

- (a) an officer of the Company;
- (b) an employee of the Company;
- (c) an individual who supplies services or goods to the Company (whether paid or unpaid);
- (d) an employee of a person that supplies services or goods to the Company (whether paid or unpaid);
- (e) an individual who is an associate of the Company;
- (f) in relation to Disclosable Tax Matters only:
 - (i) a spouse, child, dependent or dependent of a spouse of an individual referred to in any of paragraphs (a) to (e); or
 - (ii) an individual whose role or relationship with the Company is prescribed by the Taxation Administration Regulations (from time to time) as being an 'eligible whistleblower'; and
- (g) in relation to Disclosable Corporate Matters only:
 - (i) a relative, dependent or dependent of a spouse of an individual referred to in any of paragraphs (a) to (e); or
 - (ii) an individual whose role or relationship with the Company is prescribed by the Corporations Regulations (from time to time) as being an 'eligible whistleblower'.

Eligible Recipient means:

- (a) a WPO;
- (b) a director, secretary or senior manager of Intereach (for example, the immediate senior manager of the Whistleblower); and
- (c) an auditor, or a member of the audit team conducting the audit, of Intereach; and
- (d) in the case of Disclosable Corporate Matters only:
 - (i) an actuary of Intereach; and
 - (ii) any Eligible Corporate Recipient;
- (e) in the case of Disclosable Tax Matters only:
 - (i) the Commissioner of Taxation; and
 - (ii) any Eligible Tax Recipient;
- (f) a Legal Practitioner, but only to the extent the disclosure was made to that legal practitioner for the purpose of obtaining legal advice or legal representation in respect of the application of the whistleblower regime under the Corporations Act to the Protected Disclosure; and

- (g) in the case of an Emergency Disclosure or Public Interest Disclosure only, a Journalist or a Parliamentary Member. An Eligible Person who wishes to report an Emergency Disclosure or Public Interest Disclosure should take note of the criteria associated with an Emergency Disclosure or Public Interest Disclosure. If in doubt, the Eligible Person should consider contacting an independent legal adviser prior to making such disclosures.

Eligible Tax Recipient includes:

- (a) a registered tax agent or BAS agent (within the meaning of the Tax Agent Services Act 2009) who provides tax agent services (within the meaning of that Act) or BAS services (within the meaning of that Act) to Intereach; and
- (b) any other employee or officer of Intereach who has functions or duties that relate to the tax affairs Intereach.

Emergency Disclosure means circumstances where:

- (a) a disclosure regarding a Disclosable Corporate Matter was previously made by an Eligible Person to an Eligible Corporate Recipient; and
- (b) the Eligible Person has reasonable grounds to believe that the Disclosable Corporate Matter concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment; and
- (c) the Eligible Person gave the Eligible Corporate Recipient to which the previous disclosure was made a written notification that includes sufficient information to identify the previous disclosure and states that the Eligible Person intends to make an emergency disclosure; and
- (d) the extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the Journalist or Parliamentary Member of the substantial and imminent danger.

Intereach or the **Company** means Intereach Limited ACN 143 880 219.

Journalist means a person who is working in a professional capacity as a journalist for any of the following:

- (a) a newspaper or magazine;
- (b) a radio or television broadcasting services; or
- (c) an electronic service (including a service provided through the internet) that is operated on a commercial basis and is similar to a newspaper, magazine or radio or television broadcast.

Legal Practitioner means a legal practitioner, but only to the extent the disclosure was made to that legal practitioner for the purpose of obtaining legal advice or legal representation in respect of the application of the whistleblower regime under the Corporations Act to the Protected Disclosure.

Misconduct means fraud, negligence, default, breach of trust and breach of duty.

Parliamentary Member means a member of the Parliament of the Commonwealth, a State or a Territory.

Personal Work-Related Grievance is any matter:

- (a) that relates to the Whistleblower's employment (or former employment, as applicable) having implications for the Whistleblower personally; and
- (b) which does not have significant implications for the Intereach (or any other company) that do not relate to the Whistleblower; and
- (c) which does not concern conduct, or alleged conduct, referred to in subclause (a)(ii) of the definition of 'Disclosable Corporate Matter'.

Policy means this whistleblower policy, as amended from time to time.

Protected Disclosure means a disclosure of Reportable Conduct made to the relevant Eligible Recipient by an Eligible Person in accordance with this Policy.

Public Interest Disclosure means circumstances where:

- (a) a disclosure regarding a Disclosable Corporate Matter was previously made by an Eligible Person to an Eligible Corporate Recipient and at least 90 days has passed since the previous disclosure was made; and
- (b) the Eligible Person does not have reasonable grounds to believe that action is being, or has been, taken to address the Disclosable Corporate Matter to which the previous disclosure relates; and
- (c) the Eligible Person has reasonable grounds to believe that making a further disclosure of the Disclosable Corporate Matter to a Journalist or Parliamentary Member would be in the public interest; and
- (d) after the 90-day period since the previous disclosure was made has passed, the Eligible Person gave the Eligible Corporate Recipient to which the previous disclosure was made a written notification that includes sufficient information to identify the previous disclosures and states that the Eligible Person intends to make a public interest disclosure; and
- (e) the public interest disclosure is made only to a Journalist or Parliamentary Member; and
- (f) the extent of the information disclosed in the public interest disclosure is no greater than is necessary to inform the Journalist or Parliamentary Member of the Disclosable Corporate Matter referred to in the initial disclosure.

Reportable Conduct means, as the context requires:

- (a) conduct that is illegal, unacceptable or undesirable, or the concealment of such conduct. It includes conduct that:
 - (i) is against the law or is a failure by Intereach to comply with any legal obligation;
 - (ii) is dishonest, fraudulent or corrupt;
 - (iii) is unethical and in breach of any internal policies;
 - (iv) is coercion, harassment, victimisation or discrimination;
 - (v) is misleading or deceptive conduct of any kind (including conduct or representations which amount to improper or misleading accounting or financial reporting practices either by, or affecting, Intereach);
 - (vi) is potentially damaging to Intereach, an employee, Whistleblower or a third party, including unsafe work practices, environmental damage, health risks or substantial wasting of company resources;
 - (vii) may cause financial loss to Intereach or damage its reputation or be otherwise detrimental to Intereach;
 - (viii) constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or longer;
 - (ix) involves any other serious impropriety; or
- (b) a Disclosable Tax Matter; or
- (c) a Disclosable Corporate Matter.

For the avoidance of doubt, Reportable Conduct does not necessarily require a contravention of a particular law. Reportable Conduct also includes information that indicates a significant risk to public safety or the stability of, or confidence in, the financial system.

Whistleblower means, as the context requires, an Eligible Person who reports Reportable Conduct to an Eligible Recipient in accordance with this Policy.

WPO means a Whistleblower Protection Officer, including any of the following:

- (a) the immediate senior manager of the Whistleblower;
- (b) an auditor, or a member of the audit team conducting the audit, of Intereach;
- (c) a director, secretary or senior manager of any member of Intereach (for example, the immediate senior manager of the Whistleblower); and
- (d) any person nominated by Intereach from time to time as a Whistleblower Protection Officer, including the person identified in section 4.4 of this Policy.