

## Whistle-Blower Policy

### PURPOSE

The purpose of this policy is to reinforce E4 People's commitment to encourage E4 Workers and any external Whistle-blower, to speak up and address wrongdoings as early as possible that may not have otherwise been uncovered.

### SCOPE

This policy applies to all E4 Workers, at all times and without exception.

The protections in this policy will also apply to any person who has made a disclosure of information relating to E4 People to a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to whistleblowing protection laws.

### POLICY

#### Reportable Conduct

Reportable Conduct is conduct which involves:

- Dishonest behaviour
- Fraudulent activity
- Unlawful, corrupt or unethical use of company funds or practices
- Improper or misleading accounting or financial reporting practices
- Behaviour that is oppressive, discriminatory or grossly negligent
- Unsafe work practices
- A serious risk to the health and safety of any person at the workplace
- A serious risk to public health, public safety or the environment
- Concealing any information relating to the above

#### Responsibilities

E4 People will:

- Provide clear information to E4 Workers regarding their rights and protections as whistleblowers
- Establish secure and confidential channels for reporting concerns
- Investigate reported concerns promptly, impartially, and fairly
- Ensure whistleblowers are protected from retaliation, discrimination, or disadvantage
- Cooperate with Host Employers when investigations relate to incidents occurring on their sites

E4 Workers will:

- Report concerns promptly through the established whistleblower channels
- Provide accurate and factual information to the best of your knowledge
- Maintain confidentiality regarding the disclosure, unless required for investigation or by law

Host Employer will:

- Support E4 People in facilitating safe reporting processes for E4 Workers
- Cooperate with investigations of disclosures relating to incidents on their site
- Ensure E4 Workers are not subject to retaliation or adverse treatment for making a disclosure

## **How to Report**

You should in the first instance report your concerns to an E4 People Consultant by telephone or email who will treat the matter with complete confidence.

Should the discloser wish to raise matters to the Human Resources department, they may email [hrteam@hradviser.com.au](mailto:hrteam@hradviser.com.au).

Should the discloser wish to raise matters to an external party, they can raise the matter to the appropriate organisation or body, e.g., the police or Work Cover.

## **Investigation of Reportable Conduct**

Upon receiving a report, the relevant E4 People Consultant will determine if the report relates to Reportable Conduct and, if so, the report will be investigated. The investigation may be conducted internally or via an external appointed investigator.

The particular investigation process and enquiries will be determined by the nature and substance of the report. All investigations will be conducted in an objective and fair manner and will be reasonable and appropriate having regard to the nature of the Reportable Conduct and the circumstances.

Where a Discloser wishes to remain anonymous, the Discloser's identity will not be disclosed to the investigator or to any other person i.e., the Host Employer. Information that is likely to lead to the identification of the Discloser can be disclosed without the Discloser's consent, provided that the disclosure of the confidential information is reasonably necessary for the purposes of investigating the conduct disclosed by the Discloser, and all reasonable steps are taken to reduce the risk that the Discloser will be identified.

Where appropriate, the appointed investigator will provide feedback to the Discloser regarding the investigation's progress and/or outcome. This will be subject to privacy and confidentiality considerations.

## **Protections and Support Available to Disclosers**

A Discloser will not be subject to any civil, criminal or disciplinary action for making a report that is covered by this policy, or for participating in any subsequent investigation by E4 People.

E4 People do not tolerate any retaliation against any Discloser. Retaliation occurs where a person causes or threatens detrimental treatment to another person as a result of making a report of Reportable Conduct.

Detrimental treatment may include, but is not limited to:

- Dismissal
- Injury of an E4 Worker
- Alteration of an E4 Worker's position or duties to their disadvantage
- Discrimination between the E4 Worker and other employees
- Harassment or intimidation of a person
- Damage to a person's property
- Damage to a person's reputation
- Damage to a person's business or financial position
- Any other damage to a person

Detrimental treatment by any person will be deemed a serious breach of this policy and may result in disciplinary action up to and including termination of employment. Retaliatory conduct may also attract civil or criminal liability.

#### **False of Malicious Reports**

Reports made in good faith are protected, even if they are ultimately unsubstantiated. However, deliberately false or malicious allegations may result in disciplinary action.

#### **POLICY BREACH**

Where a breach of this policy is identified, E4 People may take appropriate disciplinary action, up to and including termination of employment or assignment.

#### **POLICY REVIEW**

This policy will be regularly reviewed by E4 People and may be revised from time to time. Any necessary changes will be implemented by the Directors.