

# Whistle Blower Policy & Procedure

## Policy

Everyone has a role to play in ensuring that Assetlink continues to operate to the highest standards of conduct. This Whistle-blower Policy is a key element in supporting a culture of ethical behavior, accountability, strong corporate governance, effective compliance, and risk management.

Our Whistle-blower Policy is to provide an environment in which team members can report instances of unethical, unlawful, or undesirable conduct without fear of intimidation or reprisal. This means that for those team members who “whistle blow” they will not be discriminated against or disadvantaged for making a report.

Assetlink values and encourages whistleblowing because it helps us to identify potential wrongdoing, which may not otherwise be uncovered straight away. It is important to know that a team member can make a report and know that they are protected from any retaliation that may arise because of reporting suspected or actual wrongdoing.

## What is a Whistle Blower?

A whistle-blower is someone with inside knowledge of a Company who makes a report on unethical, illegal, corrupt, fraudulent or any other undesirable conduct that is occurring in the Company.

## Who is a Whistle Blower?

The definition of who is a whistle-blower includes the following:

- Current and former team members
- Contractors (someone who supplies goods or services)
- Employees of contractors
- Associates (of the Company)
- Relatives or dependents of the aforementioned

If you meet the definition of a whistle-blower, then you are protected under whistle-blower legislation in both Australia and New Zealand. This means that you can make an ethical whistle blower report knowing that there is protection for you from any negative repercussions.

## Examples of Reportable Conduct

Assetlink encourages the reporting of any suspected or actual wrongdoing, misconduct, or improper situation, including conduct that is dishonest, corrupt, illegal, or unethical. This also includes **the concealment of such conduct**. You may make a report or disclosure under this policy if you have reasonable grounds to believe that a Company director, senior manager, team member, contractor, supplier, consultant or other person who has business dealings with the Company has engaged in Reportable Conduct.

Examples	
Misuse of confidential information	Behaviour or practices that may cause our client harm
Unethical e.g.: breach of the Company's policies such as the Code of Conduct	Violence or threatened violence, criminal damage to property
Dishonest, fraudulent or corrupt conduct	Gross mismanagement or waste
Illegal: such as theft, dealing in or use of illicit drugs	Bullying, Sexual Harassment, Discrimination
Payment of monies to secure employment	Falsifying safety audits
Financial fraud, embezzlement, tax fraud	Coercion into employment

## Making a Report

If you become aware of any Reportable Conduct, it is **expected that you will make a report** under this policy. There are several ways in which you may report or disclose any issue or behavior which you consider to be Reportable Conduct. You may disclose any Reportable Conduct to the Whistle-blower Protection Officers listed below, and it can be made outside of business hours.

Internal Reporting			
General Manager: People & Culture	Chris Dow	<a href="mailto:chrisdow@assetlink.com.au">chrisdow@assetlink.com.au</a>	0478 017 613
State Manager VIC/SA/TAS	Shavi Gajaweera	<a href="mailto:shavigajaweera@assetlink.com.au">shavigajaweera@assetlink.com.au</a>	0430 070 631
State Manager NSW	Andrew Dawson	<a href="mailto:andrewdawson@assetlink.com.au">andrewdawson@assetlink.com.au</a>	0437 602 357
State Manager QLD / NZ Retail	Richard Hughes	<a href="mailto:richardhughes@assetlink.com.au">richardhughes@assetlink.com.au</a>	0491 972 941
General Manager, AVS	Craig Fennell	<a href="mailto:craigfennell@assetlink.com.au">craigfennell@assetlink.com.au</a>	0429 473 477
General Manager Operations ANZ	Leeanne Gleed	<a href="mailto:leeannegleed@assetlink.com.au">leeannegleed@assetlink.com.au</a>	0434 697 880
Head of Aviation ANZ	Giuliano Fonte	<a href="mailto:giulianofonte@assetlink.com.au">giulianofonte@assetlink.com.au</a>	0401 248 826

Where you do not feel comfortable making an internal report, or where you have made an internal report, but no action has been taken within a reasonable time, you may disclose any Reportable Conduct via the **Confidential Whistle-blower Hot Line** which is managed by an independent third party.

External Reporting	
<b>Confidential Whistle-blower Hot Line</b>	Australia 1800 676 787 Outside of Australia +61 3 8393 3324
ASIC – Australian Securities and Investment Council (report on financial matters)	<a href="#">Make a report here</a>
ATO – Australian Tax Office (report tax fraud)	<a href="#">Tip Off Form</a> Call 1800 060 062

## Anonymity

When making a report, you may do so anonymously. It may be difficult for the Company to properly investigate the matters disclosed if a report is submitted anonymously and therefore, we encourage you to share your identity when making a report, however you are not required to do so. Where a disclosure has been made externally and you provide your contact details, those contact details will only be provided to a Whistle-blower Protection Officer with your consent.

## Investigation

Assetlink will investigate all matters reported under this policy as soon as practicable after the matter has been reported. All reports received are treated sensitively, seriously, and will be dealt with fairly, and objectively.

If the report is not anonymous, the Whistle-blower Protection Officer and/or investigator will contact you, by your preferred method of communication to discuss the investigation process and any other matters that are relevant to the investigation.

Where you have chosen to remain anonymous, your identity will not be disclosed to the investigator or to any other person and the Company will conduct the investigation based on the information provided to it.

If you are not satisfied with the outcome of an investigation, you may seek a review by contacting the National HR Manager.

## Protection of Whistle-blowers

Assetlink is committed to ensuring that any person who makes a report is treated fairly and does not suffer harm and that confidentiality is preserved in respect of all matters raised under this policy. This extends to any person who is involved in an investigation of reportable conduct.

## Protection from Legal Action

You will not be subject to any civil, criminal or administrative legal action (including disciplinary action) for making a legitimate report under this policy or participating in any investigation. Any information you provide will not be admissible in any criminal or civil proceedings other than for proceedings in respect of the falsity of the information

## Protection against Detrimental Conduct (Harm)

The Company (or any person engaged by the Company) will not engage in 'Detrimental Conduct' against you if you have made a disclosure under this policy. Detrimental Conduct includes actual or threatened conduct such as the following (without limitation):

- Termination of employment
- Injury to employment including demotion, disciplinary action
- Varying a team members role or duties
- Discrimination, harassment, bullying or intimidation or victimization
- Damage to a person's reputation
- Damage to a person's business or financial position

Assetlink will take all reasonable steps to protect you from Detrimental Conduct (harm) and will take necessary action where such conduct is identified. We will take disciplinary action, up to and including summary dismissal if the conduct emanates from an Assetlink team member.

*If you are subjected to Detrimental Conduct because of making a disclosure under this policy or participating in an investigation, you should inform a Whistleblower Protection Officer or call the Confidential Whistle-blower Hot Line.*

## Protection if a Report is made against you

A team member who is themselves the subject of a report will be treated fairly and objectively, with any findings made based on reliable evidence. The identity of the team member being investigated will be kept confidential to the extent practicable.

## Protection of Confidentiality

All information received from you will be treated confidentially and sensitively. You will not be required to provide your name when making a report. To make a report on an anonymous basis, it is recommended that you use a pseudonym and contact the Whistle-blowing Protection Officer in the manner outlined in the table above, either via mobile or email. If you report on an anonymous basis, you will still qualify for the protections in this policy.

If you make a disclosure under this policy, your identity (or any information which would likely to identify you) will only be shared if:

- You give your consent to share that information
- The disclosure is allowed or required by law (for example where the concern is raised with a lawyer for the purposes of obtaining legal advice)
- The concern is reported to an external authority such as ASIC or ATO

Assetlink will also take the following measures for protecting your identity:

- All paper and electronic documents and other materials relating to disclosures will be stored securely
- Access to all information relating to a report will be limited to those directly involved in managing and investigating the report
- Only a restricted number of people who are directly involved in handling and investigating a report will be made aware of your identity (subject to your consent) or information that is likely to lead to your identification

- Communications and documents relating to the investigation of a report will not be sent to an email address or to a printer that can be accessed by other team members
- Each person who is involved in handling and investigating a report will be reminded about the confidentiality requirements, including that an unauthorized disclosure of your identity may be a criminal offence

*If you are concerned that your identity has been disclosed in relation to a disclosure, and without your consent, you should inform a Whistleblower Protections Officer or call the Confidential Whistle-blower Hot Line.*

## Whistle-blower Support

A team member or person who makes a report under this policy or is implicated because of a report that is made, may access our Employee Assistance Program, TELUS Health (EAP) which is a free and confidential counselling service

Team members, and non Assetlink personnel may also access third party support providers such as:

Support Lines Australia	Support Lines New Zealand
<b>TELUS Health (EAP)</b> Australia 1300 361 008	<b>TELUS Health (EAP)</b> 0800 155 318
Lifeline Australia 13 11 14	Lifeline New Zealand 0800 543 354
Beyond Blue Australia 1300 22 4636	Samaritans New Zealand 0800 726 666

## Examples that you wouldn't report under the Whistle Blower Policy

Assetlink has policies and procedures in place to raise **issues or concerns that relate to your employment**. These can range from your roster, hours of work, change of duties, performance management, investigations. Anything that has to do with the terms and conditions of your employment, would be raised with your manager in the first instance, or a member of the People & Culture team via email at: [hr@assetlink.com.au](mailto:hr@assetlink.com.au) or [hr@assetlink.co.nz](mailto:hr@assetlink.co.nz)

**Raising a Grievance** – this could be a problem you have with a co-worker or your manager and the procedure of how to do this is found in our Grievance Policy & Procedure (this can be found on iConnect)

Any personal workplace related grievances related to your current or former employment with implications for you personally but do not have any other significant implication for Assetlink, these would not be raised under the Whistle Blower procedure.

This procedure will be periodically reviewed for effectiveness and to check whether any changes are required. This Policy is available to all team members via the Policy section of the internal iConnect and a made available on our website.

End of Policy

## Version History

Ver	Date	Summary of Changes	Author
1.0	July 2021	Initial document	Francine Randall
2.0	December 2021	Update to new format and branding	Francine Randall
3.2	December 2023	Updated reporting names.	Francine Randall
3.3	October 2024	Updated reporting names, corrected minor grammar/spelling, error in hr@assetlink email address, added version history, updated reference to iConnect/not iLink.	Michael Irwin