

SOUTHERN CROSS PROTECTION WHISTLEBLOWER POLICY & PROCEDURE Southern Cross Protection Pty Ltd ("SXP") ABN: 93 094 077 255		Version: 1 Issue Date: 01_01_2020 Revised: Next Review: 01_01_2022
Prepared: Sophie Barnes	Reviewed:	Approved: David Medhurst

1. PURPOSE

This Whistleblower Policy ("**Policy**") applies to Southern Cross Protection Pty Ltd ("**Company**") our employees, and other eligible Whistleblowers listed below.

A "**Whistleblower**" is any employee of the Company, or other person listed in clause 2 below, who discloses wrongdoing.

The purpose of our Whistleblower Policy is to:

- (a) Provide protections for individuals who disclose wrongdoing;
- (b) Help deter wrongdoing;
- (c) Ensure disclosures are dealt with appropriately and on a timely basis.
- (d) Provide transparency around the receipt, handling and investigation of disclosures;
- (e) Meet the Company's legal and regulatory obligations.

2. WHO THE POLICY APPLIES TO

This Policy applies to any person who is, or has been, any of the following with respect to the Company:

- Employee, Officer or Director;
- Contractor, sub-contractor, consultant or supplier (including their employees);
- Auditor;
- Associate.; and
- A spouse, parent, grand-parent, child, grand-child, brother or sister of any of the above.

3. MATTERS THE POLICY APPLIES TO

A Whistleblower is protected against adverse employment actions (dismissal, demotion, suspension, harassment, or other forms of discrimination) for raising allegations of malpractice, misconduct or conflicts of interest.

Subject to this Policy, a Whistleblower is protected, even if the allegations prove to be incorrect or unsubstantiated. Employees who participate, or assist in, an investigation will also be protected.

Every effort will be made to protect the anonymity of the Whistleblower; however, there may be situations where anonymity cannot be guaranteed. In such situations, the Whistleblower will be advised.

3.1 Reportable Conduct

You may make a report or disclosure under this Policy if you have reasonable grounds to suspect that a Company director, officer, employee, contractor, supplier, consultant or other person who has business dealings with the Company has engaged in malpractice, misconduct or conflicts of interest ("**Reportable Conduct**") and this conduct is relevant to the Company's business operations and activities:

All employees should be aware that, if an employee makes a false report, deliberately, maliciously, or for personal gain, that employee may face disciplinary action.

Below are some examples of Reportable Conduct:

- (a) illegal conduct, such as theft, dealing in, or use of illicit drugs, violence or threatened violence, and criminal damage against property;
- (b) fraud, money laundering or misappropriation of funds;
- (c) offering or accepting a bribe;
- (d) financial irregularities;
- (e) failure to comply with, or breach of, legal or regulatory;

SOUTHERN CROSS PROTECTION WHISTLEBLOWER POLICY & PROCEDURE Southern Cross Protection Pty Ltd ("SXP") ABN: 93 094 077 255			Version: 1 Issue Date: 01_01_2020 Revised: Next Review: 01_01_2022
Prepared: Sophie Barnes	Reviewed:	Approved: David Medhurst	

- (f) engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made, or be planning to make, a disclosure;
- (g) the deliberate concealment of information tending to show any of the matters listed above.

3.2 Personal Work-related Grievances

For the avoidance of doubt, Reportable Conduct does not include personal work-related grievances. These grievances should be reported to your manager in accordance with the Grievance Policy. A personal work-related grievance is a grievance about any matter in relation to a staff member's current or former employment, having implications (or tending to have implications) for that person personally and that do not have broader implications for the Company.

Examples of personal work-related grievances:

- An interpersonal conflict between the staff member and another employee;
- A decision relating to the engagement, transfer or promotion of the staff member;
- A decision relating to the terms and conditions of engagement of the staff member;
- A decision to suspend or terminate the engagement of the staff member, or otherwise to discipline the staff member.

However, it does not include:

- any conduct that would be considered victimisation of an individual because they have made, may have made, or propose to make a report under this Policy; or
- a matter that would have significant implications to the Company.

4. PROTECTION OF WHISTLEBLOWER

4.1 When the Policy will operate

This Policy protects the Whistleblower against any reprisals, provided that the Whistleblower identifies himself or herself, and the claim is:

- (a) submitted in good faith and without any malice or intentionally false allegations;
- (b) based on the Whistleblower's reasonable suspicion that the Reportable Conduct constitutes, or may constitute, a material violation; and
- (c) does not result in a personal gain or advantage for the Whistleblower.

4.2 No reprisals

No alleged malpractice or misconduct which meets the above-mentioned conditions will give rise to any reprisals, or threat of reprisals, against the Whistleblower, unless the Whistleblower is a participant in the prohibited activities with respect to which the complaint is made.

In those circumstances, the decision to file the complaint is only likely to affect the extent of the disciplinary measures (if any) that may eventually be taken against the Whistleblower.

This effectively means that the Company and its directors, officers, employees and agents will not penalise, dismiss, demote, suspend, threaten, harm, harass or victimise a Whistleblower, or transfer the Whistleblower to an undesirable job or location, or unlawfully discriminate in any manner against the Whistleblower, or take reprisals as a result of the Whistleblower having identified Reportable Conduct unless the Whistleblower is a participant in the illegal or unethical act(s).

The Company will take all reasonable steps to protect you from any reprisals and considers any reprisals against a Whistleblower to be a serious breach of this Policy and one likely to result in disciplinary measures. This protection also applies to anyone providing information related to an investigation pursuant to this Policy.

SOUTHERN CROSS PROTECTION WHISTLEBLOWER POLICY & PROCEDURE Southern Cross Protection Pty Ltd ("SXP") ABN: 93 094 077 255		Version: 1 Issue Date: 01_01_2020 Revised: Next Review: 01_01_2022
Prepared: Sophie Barnes	Reviewed:	Approved: David Medhurst

If you are subjected to detrimental conduct as a result of making a disclosure under this Policy or participating in an investigation, you should inform a Whistleblower Protection Officer or eligible participant in accordance with the reporting guidelines outlined below.

4.3 Confidentiality

The Company recognises that maintaining appropriate confidentiality is crucial in ensuring that potential Whistleblowers come forward and disclose their knowledge, or suspicions, about Reportable Conduct in an open and timely manner and without fear of reprisals being made against them.

The Company will take all reasonable steps to protect the identity of the Whistleblower and will adhere to any statutory requirements in respect of the confidentiality of disclosures made. In appropriate cases, disclosure of the identity of the Whistleblower, or the allegation made by them, may be unavoidable, such as: if the Whistleblower has previously mentioned to other people that they are considering making a disclosure; if the Whistleblower is on of a very small number of people with access to certain information; or if court proceedings result from a disclosure pursuant to this Policy.

5. WHO CAN A DISCLOSURE BE MADE TO

If you become aware of any Reportable Conduct, it is expected that you will make a disclosure under this Policy.

There are several ways in which you may report or disclose Reportable Conduct.

5.1 Internal Reporting

Any person who has reasonable grounds to suspect that Reportable Conduct has occurred, is encouraged to report that suspicion to his or her manager. If this is considered inappropriate, the manager should raise the concern with the Whistleblower Protection Officer ("**WPO**") by phone or email.

You may disclose any Reportable Conduct to the WPO listed below:

- Title: National Governance and Compliance Manager
- Name: Sophie Barnes
- Phone: 02 9923 9923
- Email: sophie.barnes@sxprotection.com.au

5.2 External Reporting

Where you do not feel comfortable making an internal report, you may disclose any Reportable Conduct to the Company's external independent Whistleblower service, Emverio Workplace Complaints ("**EW**C") using any of the following methods:

- Phone: 1300 44 574 (7am-8pm AEST Monday to Friday; excluding Public Holidays)
- Email: info@complaints.emverio.com (24/7/365); or
- Web: <https://workplacecomplaint.com.au/contact-us/> (24/7/365)

5.3 Reporting to Eligible Recipients

If you are unable to use any of the above reporting channels, a disclosure can be made to an "eligible recipient" within the Company. Eligible recipients include:

- Officers;
- Directors;
- Senior Managers; and
- Auditor or member of an audit team conducting an audit of the Company;

SOUTHERN CROSS PROTECTION WHISTLEBLOWER POLICY & PROCEDURE Southern Cross Protection Pty Ltd ("SXP") ABN: 93 094 077 255			Version: 1 Issue Date: 01_01_2020 Revised: Next Review: 01_01_2022
Prepared: Sophie Barnes	Reviewed:	Approved: David Medhurst	

Reports to an eligible recipient:

- must be made in person or by telephone; and
- must first inform the eligible recipient that they wish to make a report under this Policy.

An eligible recipient may direct you to make the report to the external whistleblowing service, or to the WPO, if they consider it appropriate in the circumstances.

All reports made under this Policy should provide specific, adequate and pertinent information with respect to, among other things, dates, places, persons, witnesses, amounts, and other relevant information, in order to allow for a reasonable investigation to be conducted.

5.4 Anonymity

If the Whistleblower discloses his or her name, the person receiving the claim will acknowledge having received the complaint and may initiate a follow-up meeting. However, if the claim is submitted on an anonymous basis, there will be no follow-up meeting regarding the claim of malpractice or misconduct and the Company will be unable to communicate with the Whistleblower if more information is required, or if the matter is to be referred to external parties for further investigation.

Whilst all Reportable Conduct claims are treated on a confidential basis, you may make a claim anonymously if you prefer.

5.5 Reporting to Regulators

You may also make a disclosure to the Australian Taxation Office (ATO), Australian Securities and Investments Commission (ASIC) or the Australian Prudential Regulation Authority (APRA) in relation to a Reportable Conduct. You will be covered by the protections outlined in this Policy if you have reported your concerns to ATO, ASIC or APRA.

5.6 Reporting to a Legal Practitioner

You may choose to discuss your concerns with a legal practitioner for the purposes of obtaining legal advice or representation. You will be covered by the protections outlined in this Policy if you have reported your concerns to a legal practitioner.

5.7 Public Interest and Emergency Disclosure

In certain situations, a disclosure to the media or a parliamentarian may be made if you have met the conditions outlined in s.1317AAD the Act. You will be covered by the protections outlined in this Policy if you have met the conditions in s.1317AAD the Act.

6. PROCEDURES FOLLOWING DISCLOSURE

Once a claim of Reportable Conduct has been received from a Whistleblower, who has provided reasonable grounds for his or her suspicion, an investigation into the claim will commence.

All material violations and any actions which may be required as a result of the investigations will be reported to the Board of Directors.

7. INVESTIGATIONS

The Company will investigate all matters reported under this Policy promptly and fairly with due regard for the nature of the allegation and the rights of the persons involved in the investigation.

The person receiving the disclosure must report it as soon as possible to the Whistleblower Protection Officer ("WPO") and/or the CEO. The WPO and/or CEO will then determine if the matter is, in fact, pertinent to any of the issues mentioned in this Policy.

SOUTHERN CROSS PROTECTION WHISTLEBLOWER POLICY & PROCEDURE Southern Cross Protection Pty Ltd ("SXP") ABN: 93 094 077 255			Version: 1 Issue Date: 01_01_2020 Revised: Next Review: 01_01_2022
Prepared: Sophie Barnes	Reviewed:	Approved: David Medhurst	

The WPO and/or CEO will determine: the appropriate scope of the investigation; the persons that should lead the investigation; the method of investigation and the timeframe. In appropriate cases, the WPO will investigate the matter, and/or where necessary, an external investigator may be appointed to assist in conducting the investigation.

During the investigation, the investigator will have access to all relevant materials, documents, and records. Evidence, including any materials, documents or records shall be held by the investigator, and held securely.

The directors, officers, employees and agents of the Company must cooperate fully with the investigator. All investigations will be conducted in a fair, independent and timely manner.

8. REPORTING

At the conclusion of the investigation, the investigator will prepare a report of the findings for the Board of Directors. If the final report indicates that Reportable Conduct has occurred, the final report will include recommendations for steps to be taken to prevent it from re-occurring in the future. It will also outline any action that should be taken to remedy any harm or loss arising from the Reportable Conduct. This may include disciplinary proceedings against the person responsible for the conduct, and the referral of the matter to appropriate authorities.

9. COMMUNICATIONS TO THE WHISTLEBLOWER

The Company will ensure that, provided the claim was not submitted anonymously, the Whistleblower is kept informed of the outcomes of the investigation of his or her allegations, subject to the considerations of privacy of those against whom allegations are made. The person against whom any allegations have been made will also be informed of the concerns and will be provided with an opportunity to respond (unless there are any restrictions or other reasonable bases for not doing so).

To the extent permitted by law, the WPO may inform you and/or a person against whom allegations have been made of the findings. Any report will remain the property of the Company and will not be shared with you or any person against whom the allegations have been made.

10. SUPPORT AVAILABLE

Any person who makes a disclosure under this Policy or is implicated as a result of a disclosure that is made may access the Company's Employee Assistance Program ("EAP") which is a free and confidential counselling service.

11. BREACH OF THE POLICY

Any breach of this Policy will be taken seriously and may result in counselling and/or disciplinary action, up to and including dismissal.

12. GENERAL

It is a condition of employment by the Company that all employees must comply at all times with this Policy. However, this Policy does not form part of any employment contract between any person and the Company, nor does it constitute terms and conditions of any person's employment with the Company.

This Policy will be made available on the Company website and the Company's Internal Communications Platform.