

Policy: 401 Whistleblower / Reporting Procedure

Policy Number	Date Approved	Date Last Amended	Status
401	1.02.2017	14.06.2023	Endorsed

Why

The Directors of BBG are committed to creating and maintaining an open working environment in which employees, (whether they are full-time, part-time or casual), contractors, suppliers, partners and consultants are able to raise concerns regarding actual or suspected unethical, unlawful or undesirable conduct.

The Directors and Executive Leadership Team recognises that any genuine commitment to detecting and preventing illegal and other undesirable conduct must include a mechanism whereby employees and others can report their concerns freely and without fear of reprisal or intimidation.

The Whistleblower / Reporting Procedure provides such a mechanism, and encourages the reporting of such conduct.

Raising or Reporting a Concern

All BBG employees and contractors have a responsibility to help detect, prevent and report instances not only of bribery and corruption, but also of any other suspicious activity or wrongdoing in connection with BBG's business.

BBG is absolutely committed to ensuring that all BBG employees and contractors have a safe, reliable and confidential way of reporting any suspicious activity.

BBG has established and will continue to maintain multiple channels that facilitate the reporting of any suspected incidence of bribery or corruption.

A BBG employee or contractor may report the issue/concern to their direct Manager, HR or Legal in the first instance. If for some reason it is not possible to speak to their Manager, HR or Legal then the issue/concern should be reported to another Senior Manager or Company Director.

If a BBG employee or contractor is not comfortable with speaking directly to a colleague or anyone mentioned above, BBG has a reporting or "whistleblower" facility for BBG employees and contractors to use.

Whistleblower Facility

A Whistleblower procedure encourages employees and contractors to come forward with credible information on illegal practices or violations of adopted policies of the organization. The policy has been created to ensure the protection of the individual from retaliation and identifies those staff to whom such information can be reported.

Internal Reporting

An employee or contractor may wish to discuss the matter informally with their direct Manager or the HR Manger first in order to determine whether an incident of misconduct has occurred. This is an opportune time to clarify the incident and ask questions. All discussions are confidential.

Where this is not appropriate, where the employee / contractor does not feel comfortable in doing so, or where the employee / contractor has previously done so and believes no action has been taken, the employee / contractor may refer to the Executive Manager | Legal, Risk and Compliance directly to discuss the incident or can report the concern by completing report form.

External Reporting

Alternatively, the employee / contractor may report misconduct, anonymously if preferred by one of the following facilities:-

- By Post HR Manager – 16 North Drive, East Bentleigh Vic 3165; Fax: 03 8855 4433
- By Post Legal and Compliance Manger – 16 North Drive, East Bentleigh Vic 3165; Fax: 03 8855 4433
- By leaving a voicemail message from a Private Number on the mobile services of the HR Manager - Phone: 0434 499 594
- By leaving a voicemail message from a Private Number on the mobile services of the Legal and Compliance Manager - Phone: 0425 209 810
- Access Anonymous Reporting Form <https://www.surveymonkey.com/r/BBGwhistleblower>

All reports under this Policy are treated very seriously and will be investigated appropriately and above all remain confidential.

Investigation Process

Following the receipt of a misconduct report, the HR or Legal and Compliance Manager (IM=Investigating Manager) will:-

- Review the report and determine the appropriate manner of investigation
- If the employee / contractor has used the internal option reporting process the IM will inform the employee / contractor as to how the investigation will proceed.
- The IM will determine what resources are needed and secure access to those resources, including where necessary the assistance of other employees or external professional help (including lawyers, accountants, forensic analysts or operational experts).
- The IM will plan and conduct the investigation.
- The IM will consider process/control improvements (risk assessments, audits, etc.).
- The IM will prepare an Investigation Report and forwards the Investigation Report to the Directors
- The IM will advise and debrief the whistleblower.

At the end of the investigation, the IM will report their findings to the Directors who will determine the appropriate response. This response will include addressing any unacceptable conduct and taking remedial action required to prevent any future occurrences of the same misconduct.

In the event one of the Directors is the subject of an investigation or allegation, the CEO will determine the report and corrective measures.

An employee or contractor that makes a report, provided he or she has not been involved in the misconduct reported, will not be penalised or personally disadvantaged in anyway because they have reported a matter.



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2.0	14.06.2023	Michelle Denison	Added anonymous survey option