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| Date Created | 14 November 2019 |
| Date Reviewed | |
| Review Date | 3 Years |

Whistleblower procedure

1. Objective

This procedure sets out the steps to be followed to declare and manage protected whistleblower disclosures within the Employer's organisation.

2. Procedures

Making a Disclosure Internally

- 2.1. Disclosures can be made to any of the following persons:
 - 2.1.1. an Officer or senior manager of bestchance;
 - 2.1.2. an auditor or actuary of bestchance;
 - 2.1.3. any person specified in the Designated Person list.
- 2.2. Where a Relevant Person has Protected Information, they should disclose that information as soon as practicable after receiving it, in accordance with this Procedure and the Whistleblower Policy.
- 2.3. Disclosures can be made in the following ways.

Whistleblower Disclosure Process

- 2.4. The Employer has a user-friendly process for Relevant Persons to make Protected Disclosures. This system can be accessed by Employees and Officers by emailing quality@bestchance.org.au. A member from the Quality and Risk team will then contact you about your Protected Disclosure.
- 2.5. Use of the Whistleblower Disclosure process is bestchance's preferred method of disclosures, as it provides the greatest flexibility to Employees and Officers making a disclosure and provides the investigator with all necessary information.

By Email, Telephone, or in Person

- 2.6. An Employee or Officer may make a Protected Disclosure to any person specified in clause 2.1 of this Procedure:
 - 2.6.1. via email to quality@bestchance.org.au
 - 2.6.2. on the telephone to (03) 8562 5179 to leave an anonymous message
 - 2.6.3. in person.
- 2.7. Note that (with the exception of using an anonymous email address) disclosures made in these ways will not be anonymous.

By Post

- 2.8. An Employee or Officer may make a Protected Disclosure by post. Note, however, that there may be delays in the investigation process where the disclosure is made by post due to postage and delivery timeframes.

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3. Management of disclosures

Investigations

- 3.1. All persons involved in the investigation will ensure that all parties involved in a Protected Disclosure and subsequent investigation will be treated fairly by bestchance and all of its Employees and Officers. This includes:
 - 3.1.1. no disadvantages to the employment of any Employee or Officer for the reason of making a disclosure or participating in an investigation process (including as an investigator);
 - 3.1.2. no victimisation of any Employee or Officer who makes a Protected Disclosure; and
 - 3.1.3. the maintenance of confidentiality, unless otherwise required.
- 3.2. The persons investigating the disclosure will conduct their investigation in a manner that is consistent with all relevant legislation and their above obligations as an investigator.

Outcomes

- 3.3. The investigator will take the appropriate action depending on their conclusions resulting from the investigation. This may include, for example, reporting their findings to a relevant regulatory body or seeking legal advice to determine an appropriate action.

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4. Version control

| Version | Section Amended | Amendment | Date Amended | Author |
|---------|-----------------|---------------|--------------|---------------------------------------|
| 0.1 | New | New procedure | 15.11.19 | General Manager People and Culture |
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