

## **Purpose and Scope**

This policy supports Coventry Group Ltd (CGL) executives in fostering a culture of corporate compliance, ethical behaviour and good corporate governance. This policy outlines a framework by which all CGL directors, employees, contractors, employees of contractors and other relevant persons can raise concerns and give them reassurance that they will be protected from reprisals or victimisation for whistleblowing.

This Whistleblower policy is intended to protect you if you raise concerns regarding activities or behaviours at CGL which are illegal, dishonest, fraudulent, corrupt, unethical, unsafe, result in incorrect financial reporting, breach CGL's Values of Respect, Fairness, Teamwork, Professionalism and Integrity, or the CGL Code of Conduct, may cause financial loss to CGL or damage its reputation, or otherwise amounts to serious improper conduct.

This policy will be made available on the CGL intranet, through the PeopleStreme portal and displayed on site notice boards.

## **Authority**

This policy was prepared by the Chief Financial Officer and has been approved by the CGL Board of Directors.

## **Policy**

### **Safeguards**

Harassment, victimisation or retaliation for reporting concerns under this policy will not be tolerated. A Whistleblower's identity will be kept confidential and they will be fairly treated. Civil penalties apply to companies who do not protect the confidentiality of Whistleblowers. It should be noted however that employees are encouraged to put their names to concerns reported to facilitate an effective investigation.

Reports will remain confidential and may only be disclosed with the consent of the Whistleblower, consistent with the need to conduct an effective investigation and for CGL to comply with any statutory obligations.

Concerns must be work related and not personal workplace grievances. It is a serious disciplinary offence to make allegations that prove to be unsubstantiated and made maliciously or known to be false.

### **CGL Reporting Officer**

The Chief Financial Officer is responsible for investigating and resolving all reported concerns and can be contacted at [r.jackson@cgl.com.au](mailto:r.jackson@cgl.com.au), +61 (0)3 9205 8215 or +61 (0)448 532 711.

### **Process**

Eligible whistleblowers encompasses current and former officers, employees, suppliers of goods or services, associates, relatives, and dependents of these individuals. Disclosures may be made where the whistleblower has reasonable grounds to believe that the information to be disclosed:

- concerns misconduct, or an improper state of affairs or circumstances of the entity or one of its related body corporates;
- indicates conduct that constitutes an offence against or a contravention of the Corporations Act, the ASIC Act and a range of other banking, insurance and superannuation industry acts, including tax related misconduct or any other Commonwealth law;
- represents a danger to the public or the financial system; or
- is prescribed by regulations

Employment and workplace related concerns should be reported through your manager or supervisor. If that is not appropriate for whatever reason you should make your report to the CGL Reporting Officer.

Other concerns, including those relating to activities which are illegal, fraudulent or unethical should be reported directly to the CGL Reporting Officer, who will ensure the Chairman, CEO and/or Board Audit & Risk Committee are advised of material incidents. If this is not appropriate for whatever reason, you should make your report to an external regulator such as the Australian Prudential Regulation Authority on +61 2 8037 9015 or the Police on 131444.

The CGL Reporting Officer will notify the complainant and acknowledge receipt of a report within five business days. All reports will be promptly investigated and, if warranted appropriate corrective action will be taken.

CGL will make its employees aware of this policy and its related processes via the PeopleStreme training programs which are conducted on commencement with the Company and through annual acknowledgements of the Code of Conduct and Corporate Governance Policies.

### Breaching this policy

This policy sets standards of behaviour and applies to everyone who performs work for CGL. Compliance to this policy is monitored by CGL and breaches of this policy will be managed in line with Company policies and procedures. Breaches that are proved to the Company's satisfaction will result in disciplinary action in line with Performance Counselling Policies and Procedures.

For contractors, it may lead to the immediate termination of a contract. It is expected that suppliers will enforce a similar set of standards with their employees.

## Associated Documents

- CGL Code of Conduct
- CGL Values
- CORP 600 – CGL Risk Management Policy
- CORP 600 P – CGL Risk Management Procedure
- CORP 150 – CGL Fraud Policy
- CORP 150 P – CGL Fraud Procedure

## Policy History

<u>Description</u>	<u>Reference #</u>	<u>Date</u>	<u>Authority</u>
Original Policy	HR 700 00	May 2004	Unknown
Revision #1	HR 700 01	June 2015	Board
Revision#2	CORP 300 00	June 2017	ELT
Revision #3	CORP 300 01	February 2018	ELT
Revision #4	CORP 300 02	May 2019	Board
Revision #5	CORP 300 03	August 2019	Board
Revision #6	CORP 300 04	June 2020	Board
Revision #7	CORP 300 05	September 2020	Board
Next Review Due		September 2022	

