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## ARI WHISTLE-BLOWING (Dealing with Serious Concerns) [Interim]

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### Statement of Commitment

*Australian Registry Investments (ARI) is committed to the highest standards of legal, ethical and moral behaviour. The purpose of this policy is to provide a supportive work environment where misconduct within ARI can be raised without fear of retribution.*

*This is achieved by:*

- *Encouraging the reporting of serious misconduct*
- *Providing protected misconduct reporting alternatives to remove inhibitions that may impede such disclosures.*

### Scope

This Policy applies to:

All ARI people (employees and contractors) and other visitors to the workplace. The “workplace” extends to external premises and events such as work-related training, conferences, formal and informal social gatherings; social media postings.

### Policy Objectives

Objectives of the Whistle-blowing Policy are:

- To encourage the reporting of concerns, whether openly or, if required, anonymously
- To ensure whistle blower’s feel confident raising concerns internally

### Related Documents

- Interim Behavioural Code
- Interim Disciplinary Policy
- Interim Grievance Policy

### Definitions

Whistle-blowing is:

The disclosure by or for a witness, of actual or suspected misconduct in an organisation that reveals fraud, corruption, illegal activities, gross mismanagement, malpractice or any other serious wrongdoing.

A Whistle-blower is:

- A person who reports serious misconduct in accordance with this policy

Misconduct includes behaviours that:

- Is fraudulent or corrupt
- Is illegal
- Is unethical, such as acting dishonestly; altering company records; willfully making false entries in official records; engaging in questionable accounting practices; or willfully breaching ARI's behavioural code.
- Is potentially damaging to ARI, such as maladministration
- Is seriously harmful or potentially harmful to an ARI employee such as deliberate unsafe work practice or willful disregard to the safety of others in the workplace
- May cause serious financial or non-finance loss to ARI; or damage its reputation; or be seriously contrary to ARI's Whistle-blowing policy
- Involves any other kind of serious impropriety including retaliatory action against a whistle-blower for having made a wrongdoing disclosure.

## Procedure

### Reporting Procedures

A Whistle-blower should report instance of, or suspicions of misconduct to Contact Point 1: The ARI Chief Financial Officer [CFO]. Reports must be made in good-faith and be as thorough as is possible. False or malicious allegations may result in disciplinary actions.

Where it is not possible or appropriate to report suspicion of misconduct to the Chief Financial Officer, Reports should be raised directly to the Director of Legal And Dispute Resolution Contact Point 2.

If the report is lodged with Contact Point1, the CFO will contact the Director LDR (Contact Point 2). Both parties will agree on the appointment of an appropriate delegate, who is not implicated in the report, to lead the investigation.

The individual who leads the investigation will be referred to as the Whistle-blower Protection Officer and should be either:

- An experienced internal investigator who is independent of the area where the wrongdoing is alleged to have occurred, or
- A qualified external investigator independent of ARI where considered necessary

The responsibilities of the appointed investigator include the assurance that action taken in response to the inquiry is appropriate to the circumstances and retaliatory action will not be taken against the person who made the disclosure.

Once the Whistle-blower Protection Officer is appointed, the Contact Point 1 or Contact Point 2 will notify the Chief Executive the details and process of the investigation to be undertaken.

The investigator has direct, unfettered access to independent financial, legal and operational advisers as required, and a direct line of reporting to the relevant Contact Point, as may be required to satisfy the objectives of this Policy.

The Whistle-blower Protection Officer must keep the Contact Point 1 or Contact Point 2 regularly informed of the investigation progress.

The Whistle-blower Protection Officer is also responsible for keeping the Whistle-blower informed of the progress and outcomes of the inquiry/investigation subject to considerations of privacy of those against whom the allegations have been made.

The internal investigator must have internal independence of line management of the area affected by the wrongdoing disclosure.

The investigator may second the expertise of other officers within ARI to assist in the investigation and may seek the advice of internal or external experts as required.

## **Whistle-blower**

A person considering making a whistle-blower report is obliged to act in good faith and have reasonable ground for believing the disclosure is reportable wrong doing

## **Obligations**

A whistle-blower must provide information to assist any inquiry/investigation of the wrongdoing disclosed.

Even though a whistle-blower may be implicated in the wrongdoing they must not be subjected to any actual or threatened retaliatory action or victimisation in reprisal for making a report under this policy

It is important to note that making a report may not protect the whistle-blower from the consequences following from involvement in the wrongdoing itself. A person's liability for their own conduct is not affected by their reporting of that conduct under this policy. However active cooperation in the investigation, an admission and remorse may be taken into account when considering disciplinary action.

## **Enquiries**

Advice in relation to this Policy and Procedure can be obtained from Human Resources.