



## Whistle-blowing Policy

Policy Statement	
<b>Purpose</b>	The purpose of this policy is to: <ol style="list-style-type: none"> <li>1. Encourage people to raise concerns if they become aware of or suspect conduct that is unethical, illegal or an act of serious wrongdoing (Reportable Conduct);</li> <li>2. Explain how to raise concerns and what protections a person may receive;</li> <li>3. Outline the processes at Paraway for responding to reports about Reportable Conduct;</li> <li>4. Promote a workplace environment in which everyone feels encouraged to speak up about Reportable Conduct.</li> </ol>
<b>Scope</b>	This Policy applies to all directors, officers and employees of Paraway Pastoral Company as well as any eligible whistle-blower who has made a protected disclosure under the whistle-blowing legislation, and as defined in this Policy.
Policy Provisions	

Paraway Pastoral Company is committed to high standards of behaviour, conduct and accountability across all its operations. Paraway encourages reporting behaviour which fails to meet this standard. Paraway fosters a 'speak up' culture and provides protections and measures so that those persons who make a report may do so confidentially and without detriment.

### 1. ELIGIBLE WHISTLE-BLOWERS

Eligible whistle-blowers are current and former:

- Directors, officers, and employees of Paraway;
- Individuals and contractors who supply goods or services to Paraway;
- Associates of Paraway (for example, the directors and/or secretaries of a related company);
- Relatives and dependents of any of the above.

### 2. REPORTABLE CONDUCT AND NOT REPORTABLE CONDUCT

Reportable conduct includes any past, present, or likely future activity which:

- Is dishonest, corrupt, or unethical;
- Involves theft, fraud, money laundering or misappropriation of funds;
- Is illegal, breaches any laws or involves a criminal activity;
- Intentionally and knowingly breach Paraway's policies and/or procedures;
- Involves offering or accepting a bribe from another person;
- Involves serious mismanagement of Paraway's resources;
- Involves any instruction to cover up or attempt to cover up;
- Presents a significant or series threat to the health and safety of Paraway staff;
- Involves systemic issues harassment, discrimination, victimisation or bullying behaviours.

This Policy does not apply to disclosures of conduct concerning a person's individual employment (other than as set out in Reportable Conduct) such as:

- Personal, work-related grievances or disciplinary matters;



- Alleged workplace discrimination or bullying of an individual;
- Personal disputes between staff; or
- Decisions regarding the engagement, transfer, or promotion of staff.

Concerns about these matters should be raised with Human Resources or the relevant manager.

### **3. REPORTING 'REPORTABLE' CONDUCT**

Paraway relies on employees and others associated with its operations to behave honestly, lawfully, and ethically and expects they will disclose any Reportable Conduct of which they suspect or become aware.

Reports and disclosures can be made verbally or in writing and can be anonymous. A report should include as much detail as possible including the details of the misconduct, people involved, dates, locations and any other evidence that exist.

A report can be made:

#### **3.1 To the nominated Paraway Whistleblowing Protection Officer:**

**Samantha Freeman**

[samantha.freeman@paraway.com.au](mailto:samantha.freeman@paraway.com.au)

Phone: 0436 413 383

A disclosure can be made to the following Eligible Recipients of Paraway:

- Chief Executive Officer
- A Director
- An auditor or member of an audit team conducting an audit of the company
- The nominated employee representative:

**Ed Shillington**

[Edward.shillington@paraway.com.au](mailto:Edward.shillington@paraway.com.au)

Phone: 0418 621 866

A disclosure can also be made to Paraway's Stopline Hotline:

<https://paraway.stoplinereport.com/>.

This is an independent and confidential service available to receive information relating to improper conduct, unlawful or unethical behaviour

Disclosures made to Eligible Recipients will then be referred to the Whistleblowing Protection Officer to be addressed under this policy.

#### **3.2 Alternative reporting options**

The protections outlined in this Policy also apply to disclosures made:

Type	How to report
Anonymously	Disclosures may be made anonymously. However, this may make the investigation more difficult.



Regulator Reporting	Reportable conduct may be disclosed to the Australian Securities and Investments Commission (ASIC) or the Australian Prudential Regulation Authority (APRA).
Legal Practitioner	Concerns may be disclosed to a legal practitioner for the purposes of obtaining advice or representation.
Public Interest and Emergency Disclosure	Where the issue is so serious or urgent that disclosure to the media or parliament is considered necessary, the law requires: <ul style="list-style-type: none"><li>• A report to ASIC or APRA to have been previously made;</li><li>• At least 90 days passed since the report to ASIC or APRA, and reasonable grounds exist to believe that action to address the concerns is being or has been taken;</li><li>• There are reasonable grounds to believe that reporting the concerns to a journalist or parliamentarian would be in the public interest;</li><li>• After 90 days from when you reported to ASIC or APRA, written notice is provided to ASIC or APRA including sufficient information to identify the earlier report and the intention to make a public interest disclosure.</li><li>• There are reasonable grounds to believe that the information in the report concerns substantial and imminent danger to the health or safety of one or more people or to the natural environment.</li><li>• The extent of the information disclosed to the journalist or parliamentarian is no greater than is necessary to inform the recipient about the concerns.</li></ul>

#### **4. INVESTIGATING REPORTABLE CONDUCT**

The Whistle-blower Protection Officer will assess all reports received and determine whether the matter falls under this Policy.

A report assessed as falling within this Policy will be investigated:

- Either internally or externally, depending on the nature of the report;
- As soon as practicable and in a fair and independent manner from any person to whom the disclosure relates;
- In an objective and fair manner ensuring every person subject to the investigation is granted sufficient opportunity to reply to allegations before any findings are made.

The person who made the disclosure will be informed on the progress of the investigation. Issues identified from the investigation will be resolved or otherwise finalised.

#### **5. PROTECTION OF WHISTLE-BLOWERS**

Paraway will ensure that any person who makes a disclosure is treated fairly, does not suffer harm and that confidentiality is preserved.

##### **5.1 Protection from legal action**

Anyone making a disclosure under this policy or participating in any investigation will not be subject to any civil, criminal, or administrative legal action (including disciplinary action) for making the disclosure.



**5.2 Protection against detrimental conduct**

Detrimental conduct includes and harassment, discrimination, retaliation, or threat against a person involved in a report or investigation under this Policy. Paraway will not engage in or tolerate any detrimental conduct against any person who has made a disclosure or is involved in any whistle-blowing investigation. Any detrimental conduct against a person reporting Reportable Conduct will be treated as a serious wrongdoing.

These protections will apply even where it is found a report was mistakenly made or not substantiated.

**5.3 Protection of Confidentiality**

All information received will be treated confidentially, sensitively and will only be released by your consent or if required by law.

**6. NON-COMPLIANCE**

Any breach of this Policy by an employee may be regarded as misconduct and result in disciplinary action including dismissal. A breach of this Policy may also amount to civil or criminal contraventions of Australian whistle-blower protection laws (in particular under the Corporations Act and the Taxation Administration Act) and give rise to significant penalties.

**7. DOCUMENT, REVISION AND VERSION CONTROL**

<b>Accountabilities</b>				
<b>Document Owner</b>		Company Secretary		
<b>Supporting Information</b>				
<b>Legislative Compliance</b>		This policy supports Paraway’s compliance with following legislation: Corporations Act 2001 (Cth) <ul style="list-style-type: none"> <li>• Taxation Administration Act 1953 (Cth)</li> <li>• Treasury Laws Amendment (Enhancing Whistle-blower Protections) Act 2018</li> </ul>		
<b>Document Number</b>				
<b>Revision History</b>				
<b>Version</b>	<b>Reviewed by</b>	<b>Approved by</b>	<b>Effective date</b>	<b>Sections Modified</b>
1.0	Company Secretary	PPCo Board	24 May 2021	New document
2.0	Company Secretary	PPCo Board	14 June 2022	Readoption
3.0	Company Secretary	PPCo Board	15 August 2023	Readoption
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