

Our Commitment

The CFC Group (“Group”) is a value-driven group of companies and wishes to encourage its employees to live and act our RIPPA Values: which include Respect, Integrity and Accountability.

These values are the backbone of the Group and underpin our commitment to fostering a culture of compliance, ethical behaviour and good corporate governance which includes a culture where anyone can freely speak up about potential concerns about misconduct without suffering detriment.

This policy has been adopted to provide a safe and confidential environment for people to raise any such concerns without fear of reprisal. It sets out:

- ▶ when you will be protected for speaking up about misconduct;
- ▶ the protections that may be provided to you if you speak up; and
- ▶ how disclosures made under this policy will be handled by the organisation.

This policy applies to everyone who is working or has worked, for the Group or on its behalf including employees, contractors, subcontractors and suppliers. This policy is available on:

- ▶ the Group’s website (cfc.com.au) and intranet site; and
- ▶ the website of our independent and external whistleblowing hotline and reporting service Whistle Blowing Service (WBS) (whistleblowingservice.com.au/cfc).

Our Approach

The Group will achieve our commitment by:

- ▶ Complying with all applicable Australian and international legislation.
- ▶ Implementing supporting systems and practices to manage the implementation of this policy.
- ▶ Providing alternatives to report and manage any real, or perceived, conflicts of interest in the whistleblower practices. This will include an external independent option.
- ▶ Ensuring roles and responsibilities are assigned to appropriately trained personnel to manage the systems and practices.
- ▶ Appropriate oversight of the whistleblower practices and reports.
- ▶ Encouraging and enabling everyone to comment on or raise concerns about the implementation of this policy.
- ▶ Managing any identified breaches of this policy through the Group Code of Conduct.

Who can make a disclosure?

You can make a disclosure that qualifies for protection under the Australian whistleblower laws if you are or were:

- ▶ A director, officer or employee of the Group, including permanent, part-time, fixed-term or temporary employees or interns and secondees;
- ▶ a supplier of goods and services to the Group (whether paid or unpaid), including their employees (for example, contractors, consultants, service providers and business partners); or
- ▶ an associate of the Group; or
- ▶ a parent, grandparent, child, grandchild, sibling, spouse or dependent of any of those people.

Who is protected under this policy?

You will be protected under this policy if:

- ▶ you are one of the individuals defined above;
- ▶ you disclose information about the type of matters set out below; and
- ▶ you disclose that information to one of the persons set out below.

We encourage you to contact your manager or our WBS if you have any questions about making a disclosure or this policy generally.

- ▶ In some cases, you may wish to obtain independent legal advice:
- ▶ before making a disclosure (for example, if you are thinking about making a disclosure to a Member of Parliament (MP) or a journalist); or
- ▶ if you feel you have suffered detriment because you made a disclosure, including if you wish to seek compensation or remedies in court for potentially detrimental conduct or a failure to protect your identity.
- ▶ Any communication with your legal adviser will also be protected under Australian whistleblower laws (irrespective of the outcome of that advice).

What can a disclosure be about?

We encourage people to make disclosures about a broad range of matters. Whilst not all matters will qualify for protection under the Australian whistleblower laws, we will treat all disclosures made under this policy in the same way. However, disclosures cannot be made under this policy relating solely to personal work-related grievances except in limited circumstances.

To be protected under Australian whistleblower laws, you must make an eligible disclosure and must have reasonable grounds for that disclosure. You can still qualify for protection if your disclosure turns out to be incorrect, but you will not be protected if you make a deliberately false disclosure.

Disclosures do not have to be about breaking the law. Eligible disclosures can be about misconduct or an improper state of affairs or circumstances that you have reasonable grounds to suspect have occurred or are occurring in relation to the Group or any of its businesses.

Some examples of matters that are eligible disclosures are:

- ▶ conduct that amounts to a criminal offence or contravention of the Corporations Act 2001 (Cth) or Australian Securities and Investments Commission Act 2001 (Cth);
- ▶ conduct that is a Commonwealth criminal offence punishable by imprisonment of 12 months or more;
- ▶ illegal conduct, such as fraud, theft, corruption, bribery, criminal damage to property;
- ▶ breaches of work health and safety laws;
- ▶ breaches of heavy vehicle or road transport laws;
- ▶ negligence, default, breach of trust and breach of duty;
- ▶ improper, unethical or dishonest conduct, such as misuse of company assets, conflicts of interest or abuses of authority;
- ▶ an activity that poses a significant risk to public safety, people, property, operations or the environment (irrespective of whether it involves a breach of law);
- ▶ conduct that represents a danger to the public or the financial system;

- ▶ conduct that represents a significant risk to the stability of or confidence in the financial system (irrespective of whether it involves a breach of law);
- ▶ occurrences of Modern Slavery, as defined in our Modern Slavery policy;
- ▶ conduct that is damaging to the Group's financial position or reputation;
- ▶ misconduct concerning corporate governance, accounting, tax or audit matters; or
- ▶ engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made, or be planning to make, a disclosure.

Personal work-related grievances

A personal work-related grievance is a grievance about an individual's employment that has implications only for the individual personally (such as payroll or remuneration issues, promotion decisions and interpersonal conflicts), but does not have any other significant implications for the relevant business, broader Group or relate to conduct about an eligible disclosure as referred to above.

Disclosures about solely personal work-related grievances are not covered by this policy and do not qualify for protection under the Australian whistleblower laws unless they also relate to any detriment or threat of detriment to the discloser.

However, such a disclosure may still qualify for protection if:

- ▶ it is a 'mixed' disclosure - meaning it includes information indicating other misconduct beyond your personal circumstances (for example, widespread bullying or harassment);
- ▶ the Group has breached employment or other laws punishable by imprisonment for a period of 12 months or more;
- ▶ the Group has engaged in conduct that represents a danger to the public;
- ▶ you suffer from or are threatened with, detriment for making a disclosure; or
- ▶ you seek legal advice or representation about the operation of the Australian whistleblower laws.

If your disclosure is a solely personal work-related grievance, you should make it in accordance with the relevant HR policy of the business for which you work, which can be accessed on your business' local intranet portal.

If you are unsure, we encourage you to make your disclosure under this policy.

Who can receive a disclosure?

We encourage you to make your disclosure to:

- ▶ the Whistle Blowing Service (WBS), an external and independent whistleblowing hotline and reporting service engaged by the Group for all its businesses; or
- ▶ your manager.

How can a disclosure be made?

You can make your disclosure anonymously (and stay anonymous throughout and after any investigation) and still qualify for protection under the Australian whistleblower laws.

We encourage you to:

- ▶ call the WBS by telephone: 1300 687 927
- ▶ use the form on the WBS website <https://www.whistleblowingservice.com.au/cfc/>
You will need to click on the 'Make a Report' button and provide the following keys:
 - **Unique Key** = CFC2020
 - **Client Reference Number** = qq191
- ▶ talk to your manager.

If you make your disclosure to your manager please be aware they are required to use the form on the WBS website. If you make a disclosure using a work computer or internet service nothing you disclose will be logged but your access to the WBS website will be and this may be accessed by certain people within our IT department in accordance with the Group's policies. If you are concerned about those limited circumstances in which you're accessing the WBS service might be accessed, you may prefer to make your disclosure to your manager.

Protections for disclosers

The Group and its businesses handle any disclosures made to it under this policy to protect disclosers.

Identity protections

If you make a protected disclosure, it is illegal for anyone to identify you or disclose any information that is likely to lead to you being identified, unless:

- ▶ any disclosure of information does not include your identity and is reasonably necessary to investigate your disclosure (but all reasonable steps must be taken to reduce the risk that you will be identified from the information);
- ▶ it is necessary to obtain legal advice about your disclosure and the whistleblower laws, in which case, we can pass the information on to our lawyer;
- ▶ we need to disclose the information to the Australian Federal Police; the Australian Securities and Investments Commission (ASIC); the Australian Prudential Regulatory Authority; or the Australian Commissioner of Taxation (ATO), if the disclosure concerns the Group's tax affairs or the tax affairs of an associate of the Group; or
- ▶ you consent to that disclosure.

Confidentiality and secure record keeping

Subject to the exceptions allowed in this policy or otherwise by law, the identity of a whistleblower (or information that is likely to lead to their identity becoming known) must be kept confidential at all times during and after the investigation (including in any reporting to the Board or to any persons affected). All persons responsible for or involved in an investigation must take all reasonable steps to reduce the risk that a whistleblower will be identified.

The Group and its businesses will keep your identity and your disclosure confidential and secure by:

obscuring your name and identifying features from any internal reporting about your disclosure (unless you agree for your identity to be known);

limiting access to all paper and electronic documents and materials to those directly involved in managing and investigating the disclosure; and

ensuring that anyone who is involved in handling and investigating your disclosure is aware of the confidentiality requirements.

Protection from detriment

The Group and its businesses are committed to protecting people who make disclosures under this policy.

No one at the Group or any of its businesses may cause or threaten any detriment to any person because they think a disclosure has been or might be made under this policy.

“Detriment” includes (but is not limited to):

- ▶ dismissal of an employee;
- ▶ injury of an employee in their employment;
- ▶ alteration of an employee’s position or duties to their disadvantage;
- ▶ discrimination, harassment or intimidation;
- ▶ harm or injury including psychological harm, damage to property, reputation or financial position; or
- ▶ taking action against a person (including any disciplinary action or imposing a liability) for making a disclosure.

However, the Group is entitled to take steps that:

- ▶ are reasonably necessary to protect you from detriment (for example, moving you to another office to protect you from detriment if you have made a disclosure about your immediate work area); or
- ▶ relate to managing unsatisfactory work performance in line with the Group’s performance management approach.

Protection from civil, criminal and administrative liability

You will also be protected from any of the following in relation to your disclosure:

- ▶ civil liability - for example, any legal action against you for breach of an employment contract, duty of confidentiality or another contractual obligation;
- ▶ criminal liability - for example, prosecution for unlawfully releasing information or otherwise using your disclosure against you in a prosecution (other than for making a deliberately false disclosure); and
- ▶ administrative liability - for example, disciplinary action for making a disclosure.

However, you may be liable for any personal misconduct revealed by your disclosure.

Compensation and other remedies

You may seek compensation and other remedies through the courts if:

- ▶ you suffer loss, damage or injury because of a disclosure; and
- ▶ the Group failed to take reasonable precautions and exercise due diligence to prevent detrimental conduct.

Support and practical protections

The Group has in place practices for protecting, supporting and monitoring the welfare of anyone who makes a disclosure.

This includes risk assessment of any potential detriment, work adjustment considerations and support services such as stress management strategies which may include counselling.

Investigations of disclosures under this policy

When you make a disclosure under this policy, your disclosure will typically be investigated as follows:

- Step 1) The WBS will notify the Group General Counsel, or an alternative if that individual has any involvement in the matter being disclosed.
- Step 2) The person who receives your disclosure will determine whether your disclosure is covered by this policy. If it is they will:
- a. appoint a Whistleblower Protection Officer with no personal interest in the matter as soon as practicable, ensuring your identity is protected unless you have consented otherwise; and
 - b. appoint an investigator with no personal interest in the matter to conduct an investigation. If required, an external investigator will be appointed to ensure the investigation is handled fairly and independently or where specialist skills or expertise are necessary.
- Step 3) The investigator(s) will conduct the investigation objectively and fairly, ensuring that they give any employee mentioned in the disclosure an opportunity to respond to the allegations before any adverse findings are made against them. Those employees are also entitled to access the support services defined in this policy.

If you can be contacted (including through anonymous channels), we will give you regular updates on the status of the investigation as appropriate, with the frequency and timing of such updates depending on the nature of your disclosure.

The Group will aim to conclude the investigations within six months of receiving your disclosure. But that time may vary depending on the nature of your disclosure.

The Whistleblower Protection Officers' role during the investigation is to ensure that the protections defined in this policy are implemented for you.

- Step 4) The outcome of the investigation will be reported to the Group Board and your businesses Board, or delegated committee, (protecting your identity, if applicable) and may if the Whistleblower Protection Officer considers it appropriate, be shared with you and any persons affected.

We encourage you to raise any concerns you have about the investigation of your disclosure, your treatment or any aspects of this policy with your appointed whistleblower Protection Officer, the person you made your disclosure to or the WBS, and we will consider whether any further steps need to be taken.

Board reporting

The Group Board, or its delegated committee, will receive at least bi-annual reports on all active whistleblower matters, including information on:

- ▶ the number and nature of disclosures made in the last quarter (for example, by who, who to and matter type);
- ▶ how disclosures were reported;
- ▶ the status of any investigations underway;
- ▶ the frequency of communications with disclosers;
- ▶ the outcomes of completed investigations and actions taken;

- ▶ the timeframes for responding and investigating disclosures; and
- ▶ any identified issues with the practices or this policy.

Training

All Whistleblower Protection Officers and all eligible recipients of disclosures must undertake compulsory training on responding appropriately to disclosures made under this policy.

All employees and contractors must receive information on our whistleblower program which will include information on how to make a disclosure, what the disclosure can be about, who a disclosure can be made to and how the protections and support are available and when further information or independent legal advice might be sought. Anyone that may make a disclosure will have access to this policy and the WBS.

Responsibility

All Group employees and contractors are expected to read, understand, raise any concerns and adhere to this policy and all related supporting documents. The Executive team are accountable for ensuring this policy is implemented.

The Group Board has ultimate responsibility for ensuring this policy meets the minimum baseline obligations for each organisation within the Group, is aligned with the Group's Values and is implemented by management.

This policy has been approved by the Group Board and will be reviewed biennially.



Philip Cardaci
Group Executive Chairman

18 May 2023