



WHISTLEBLOWER PROTECTION POLICY

BSA is committed to the effective reporting of corrupt and illegal practices, and all behaviour that is contrary to BSA's Code of Conduct.

BSA's Whistleblower Policy has been adopted to ensure that concerns regarding unethical, unlawful or improper conduct can be raised, by offering a reporting mechanism that is objective, confidential and independent, and protects from reprisal or disadvantage.

The Policy also applies to employees and officers of BSA contractors, whether full-time, part-time, or casual, at any level of seniority and wherever employed.

Information that is protected by law from disclosure without the Whistleblower's consent will only be reported to the Whistleblower Protection Officer with the Whistleblower's prior written consent. This summary should be read subject to that requirement.

Whistleblowers are encouraged to report any genuine matter or behaviour that they honestly believe contravenes BSA's Code of Conduct, policies or the law. Matters may include any actual or suspected conduct that is:

- Dishonest;
- Discriminatory, constitute bullying or harassment;
- Fraudulent;
- Corrupt;
- Illegal (e.g. theft, violence or threatened violence);
- In breach of Commonwealth or state legislation, or local authority by-laws (e.g. *Competition and Consumer Act 2010*);
- Unethical (in breach of the BSA Code of Conduct, or generally);
- In relation to unsafe work practice (in breach of workplace health and safety legislation);
- Gross mismanagement;
- Repeated breach of BSA procedures;
- Environmental issues; or
- Any other conduct which may cause financial, or non-financial, loss to BSA, or be otherwise detrimental to the interests of the organisation.

If an employee, or contractor, becomes aware of any matter or behaviour that they think contravenes BSA's Code of Conduct, policies or the law, they are encouraged to take the matter up with the Compliance Officer, their immediate supervisor, manager, or, in the case of employment issues, Human Resources.

BSA has appointed a Whistleblower Protection Officer and a Whistleblower Investigations Officer. Employees and contractors are encouraged, in the first instance, to report any matter to their immediate supervisor, or manager. If an employee or contractor is not satisfied with the response of their supervisor or manager (or if the matter involves their supervisor or manager), they can report the matter via a Whistleblower hotline, either anonymously, or by identifying themselves.

The Whistleblower Investigations Officer will investigate all reported concerns appropriately and will, where applicable, provide feedback regarding the investigation's outcome. BSA will take any necessary action in response to a report; and, where no action is taken, an explanation will be given. Where appropriate, a third party may be engaged to assist in the investigation.

Every six months a report will be made to the Audit and Compliance Committee summarising the whistleblower activities for the period. This report may be used to make general proposals to improve the compliance culture of BSA.



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A Whistleblower will not be discriminated against in their employment or engagement with BSA for making a report nor will they be disadvantaged or the subject of reprisals for their actions in making a report. If there is retribution against a Whistleblower, the Whistleblower must report this to the Whistleblower Protection Officer.

BSA will review this Policy on an annual basis to ensure that it remains effective.

Whistleblower Hotline details:

Deloitte Touche Tohmatsu

Telephone Hotline: 1800 501 956

Website: www.bsawhistblower.deloitte.com.au
username: *BSA*
password: *Password1!* (password is case sensitive)

Email: bsa.whistleblower@deloitte.com.au

Fax: 03 9691 8182

Mail (Reply Paid Mail): BSA Whistleblower Service
Reply Paid 12628
A'Beckett Street
Victoria 8006