SAfeplace

Whistle-blower Policy

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Section 1: Our Purpose

1.1 Our Goals & Commitment

Access Group Solutions' Vison is to deliver service excellence that balances social, environmental, and economic priorities.

To achieve our vision, it is crucial that all of our employees and partners understand, follow, and adhere to our values. We strive to incorporate these visions and values into daily operations to benefit not only our client, but the community as a whole.

The agreed and shared beliefs that motivate all our personnel are Integrity, Loyalty, Commitment, Teamwork, and Respect.

Access Group Solutions has always been committed to encouraging a 'speak up' culture in which honesty, integrity and business ethics are a part of everyday behaviour.

These formal guidelines and policies are in place to ensure we live by these values in our day-to- day work.

Together with our values, we welcome feedback and encourage people to speak up when they see or reasonably suspect activity or behaviour that they feel is wrong or does not match our values.

The goal of this policy is to encourage more disclosures of wrongdoing and provide clear guidelines on how we manage this feedback. With our Whistle-blower policy, we aim to ensure that:

- every employee should have the chance to speak up. They should have a place to report misconduct, every report will be heard and acted on, and we will make improvements based on the results.
- Access Group Solutions believes everyone should be able to make reports anonymously and confidentially. We commit to protecting informant's identities and they only need to reveal themselves if they choose to.
- we will investigate every report of misconduct. At the end of the investigation, we will document the results and provide feedback when appropriate.
- employees who make reports under this policy can do so safely, securely and with the confidence that they will be supported and protected from detriment for doing so.

1.2 Our Commitment

Access Group Solutions wants our employees to understand that they can provide information on any concerns they have, know where they can report their concerns, what happens after they make a report and ensure they feel safe in providing a report. Access Group Solutions also wants to let our employees know about their right to anonymity and how we as an organisation will ensure they are not subject to any retaliation or other abuse because they made a report.

1.3 What Conduct Should Be Reported

It is important that Access Group Solutions outlines what behaviour we want to be reported under this policy. We want to hear from you if you witness or know about or reasonably suspect any behaviour that is:

- Harassment, discrimination, bullying or any other form of unacceptable behaviour.
- Creating an unsafe environment.
- Victimising someone for making a disclosure
- Fraudulent, illegal, corrupt, or dishonest conduct.
- Unethical conduct.
- A breach of any of our company policies
- Violates the law or any legal code.
- Conduct which is detrimental to Access Group Solutions or any of its related entities and could cause financial or non-financial loss.

These matters are referred to as "Wrongdoing" in this policy.

Subject to our legal obligations with respect to protecting the identity of a person who makes a whistleblowing report, Access Group Solutions may refer to relevant external agencies (such as the police) information in a Whistle-blower Report and the findings of an investigation which have revealed conduct that may constitute a legal or criminal offence.

If you experience an immediate life-threatening situation, we ask that you call emergency services on 000 for immediate assistance.

1.4 Personal work-related grievances

Access Group Solutions encourages everyone to speak up about concerns. However, reports that relate solely to personal work-related grievances are not generally considered to be Wrongdoing and are therefore not covered by this policy.

Personal work-related grievances typically relate to an individual's current or former employment arrangements, performance, remuneration outcomes or personal circumstances that do not have significant implications for the organisation (for example an interpersonal conflict between you and another employee).

If you have a complaint about a work-related grievance, please refer to our Grievance Policy or speak to your immediate manager or supervisor or to our People Culture Manager.

However, sometimes a disclosure of a personal work-related grievance will be a protected disclosure if, in summary:

- it includes information about Wrongdoing or information about Wrongdoing includes or is bundled with a report of Wrongdoing.
- it includes information about Wrongdoing beyond an individual's personal circumstances, demonstrates a systemic issue within Access Group Solutions or has significant implications for the organisation.
- concerns detriment to a person because they have or may be considering reporting Wrongdoing; or
- it is made to a legal practitioner for the purposes of obtaining advice or legal representation in relation to the operation of the law about whistle-blowers.

Under Australian law, a grievance is not a 'personal work-related grievance' if it:

- has significant implications for an entity regulated under the law that do not relate to the discloser.
- concerns conduct, or alleged conduct, in contravention of specified corporate and financial services laws, or that constitutes an offence punishable by 12 months or more imprisonment under any other Commonwealth laws.
- concerns conduct that represents a danger to the public or financial system; or
- concerns conduct prescribed by the regulations.

1.5 What are the consequences of making a false report?

You do not need to prove the allegations, but you are encouraged to provide evidence in support of your disclosure if it is safely available. An eligible whistle-blower can still qualify for protection even if their report turns out to be incorrect or unsubstantiated provided, they have a reasonable basis for making the report.

Where it is found that a person has knowingly or recklessly made a false report of misconduct, that in itself will be considered a serious matter and will render the person concerned subject to disciplinary action, which may include dismissal. The type of disciplinary action will depend on the severity, nature, and circumstance of the false disclosure.

1.6 Who is Eligible to Report Under This Policy?

The following would be considered an "eligible person" and would fall under Access Group Solutions Whistle-blower policy.

Any current or former:

- officer of Access Group Solutions
- an employee of Access Group Solutions including any volunteers and work experience students.
- a person who supplies goods or services to Access Group Solutions whether paid or unpaid, or an employee of such a person.
- an associate of Access Group Solutions or
- a spouse, relative or dependent of a person referred to above.

This policy applies to all Access Group Solutions' businesses, related entities, divisions, and offices. It also applies across all jurisdictions where we operate. If local legislation, regulation, or laws provide a higher level of protection than what is included in this policy, the local legislation will take precedence.

Section 2: Process for Making a Report

2.1 What Options Do Employees Have for Making a Report

Access Group Solutions encourages individuals to report actual or suspected Wrongdoing in accordance with this section as soon as they become aware of it.

Access Group Solutions encourages the making of a report using our whistleblowing service, Your Call. Your Call is an external, independent provider that provides confidential reporting of whistle-blower concerns related to this policy. Reporting to Your Call also enables a report to be made anonymously if a person chooses to do so. To make a Whistle-blower report to Your Call:

(i) Online: https://www.yourcall.com.au/report You will be required to enter Access Group Solutions' unique identifier code ACCESS2022

(ii) By phone using Your Call's external reporting hotline: 1300 790 228 (9am to midnight AEST on business days).

How Your Call works

Your Call uses an online message board which you will have access to after making the report. The message board allows you to:

- communicate with Your Call and with Access Group Solutions with or without revealing your identity.
- securely upload any relevant documentation and/or material that you wish to provide.

- receive updates; and
- request support or report detrimental acts.

Reports to Your Call will be provided to the Disclosure Officers. If a report relates to a Disclosure Officer, Your Call will exclude that person from all communications when they provide information about an individual's report to Access Group Solutions.

How to use Your Call if you have a speech or hearing impairment

If you are deaf or have a hearing or speech impairment, you can contact Your Call online. If you would like to contact Your Call by phone, they can do so through the National Relay Service by choosing the preferred contact method at www.relayservice.gov.au and requesting Your Call's hotline 1300 790 228.

You can also make a report to one of Access Group Solutions' Disclosure Managers. The Disclosure Managers are:

Name	Role	Email	Telephone
Rebecca Curran	Whistle-Blower Report Manager	wbrm@accessgroupsolutions.com.au	1300888247
Chris Delaney	Disclosure Manager	chris@accessgroupsolutions.com.au	1300888247
Jason Raj	Disclosure Manager	jason.r@accessgroupsolutions.com.au	1300888247

2.2 Remain Anonymous

Access Group Solutions respects and protects your identity if you choose to make an anonymous report. You can choose to remain anonymous while making a report, interacting with case managers during an investigation of your report, as well as after your case is closed.

At any given time, you can identify yourself, but this is your choice and at no point will you be forced to provide your identity. If you decide to disclose your identity, Access Group Solutions will work to protect your identity and will outline and document who in the organisation you have consented will know you submitted your report. Access Group Solutions will also take all steps necessary (and outlined in this policy) to ensure you do not suffer any retaliation.

Access Group Solutions will make every endeavour possible to investigate your report, however there may be certain cases where there are limitations of what can be achieved if the informant decides to remain anonymous. We encourage individuals who would prefer

to remain anonymous to maintain ongoing two-way communication with Access Group Solutions so that Access Group Solutions can ask follow-up questions and provide feedback. This can be done using the Your Call service.

2.3 What Is the Investigative Process?

Access Group Solutions will be transparent and outline what the process is to investigate a report submitted through our Whistle-blower channels.

Below, we have provided the different steps a case manager or member of our Whistle-blower team will go through once a report is received until the case is closed.

1. Report (anonymous or otherwise) is received.
2. Whistle-blower Report Manager (WRM) receives report directly or from third party and confirms validity of report.
3. If report deemed to be valid, WRM assigns a case manager for assessment and investigation.
4. The case manager will begin their investigation. This can include corresponding with the informant if there is a channel to do this and the informant has consented to their identity being known by the case manager.
5. The case manager will investigate and update the Whistle-blower Report Manager and the informant per policy guidelines.
6. Once the case manager has finalised their investigation and report, the Whistle- blower Report Manager and the informant will be updated.
7. At this point, the case manager will hand everything over to the Whistle-blower Report Manager for any subsequent action to take place.

2.4 How We Use Independent Service Providers

Access Group Solutions will utilise Your Call, an independent service provider and platform in our Whistle-blower program and strategy.

Access Group Solutions has elected to utilise an independent third-party service provider to ensure we protect the informant's identities and leverage technologies to ensure the informant cannot be identified unless the informant chooses this to happen. This platform also allows for 2-way, anonymous communication as well as case management and data protection features.

2.5 Who Is Alerted to A Report?

Once a report is submitted (anonymous or not), this report goes to the Whistle-blower Report Manager (WRM). This WRM will then assess the report and assign it to a case manager, who will manage the investigation.

Certain senior managers may be alerted to the contents of report (but not the identity of the discloser unless the discloser has consented to their identity being shared) as part of

the reporting process or if they are involved in the investigation in some manner.

If you make a report of Wrongdoing in accordance with this policy, your disclosure will be treated as confidential in accordance with legal requirements. If you make a report that qualifies for protection under the whistleblowing laws, it is illegal for a person to disclose your identity or information that is likely to lead to identification of your identity, unless:

- you give your consent.
- the disclosure is required by law; or
- the disclosure is made to:
    - a professional legal advisor (including Access Group Solutions' legal team) for the purpose of obtaining legal advice or representation; or
    - authorised regulatory bodies, such as ASIC or a member of the Australian Federal Police.

However, a person who is dealing with the report may disclose information that is reasonably necessary for the purposes of investigating the report. If this happens, reasonable steps will be taken to reduce the risk that you will be identified as a result of the report (for example by removing your personal information or other details that are likely to identify you).
To maintain confidentiality of a discloser's identity, Access Group Solutions' will:

- ensure personal information or references to the discloser's identity is redacted in all investigation and reporting documents.
- refer to the discloser in gender-neutral terms.
- ensure that the information a discloser provide and all materials relevant to their report held securely with access limited only to the individuals necessary to investigate the report, and to support and protect the discloser; and
- take reasonable steps to ensure its personnel understand the requirements of this policy.

You should also be aware that during an investigation, it may be necessary for us to tell the people who are believed to be involved in the Wrongdoing about the alleged Wrongdoing. This is to ensure a fair investigation and provide those people with an opportunity to respond to the allegations. Although we will not tell these people your identity unless you give consent, it is possible that the details of the report may lead them to believe that they know the identity of the Whistle-blower.

Any breach of confidentiality will be treated as a serious matter and may be the subject of disciplinary action up to and including dismissal or termination of engagement with Access Group Solutions. Breaches of Whistle-blower confidentiality are also an offence under the Corporations Act and the Taxation Administration Act and serious penalties apply for both individuals and corporations.

If you believe your confidentiality as a discloser has been breached, you can make a complaint to one of the Disclosure Managers listed in section 2.1 or by contacting Your Call.

Once an investigation of a Whistle-blower Report has been completed, the findings will be provided to the following people.

Report relating to	Findings reported to
General Manager	Managing Director
Leadership Team (excluding General Manager)	General Manager & Managing Director
Whistle-blower Report Manager & Case Managers	General Manager & Managing Director
All others	Whistle-blower Report Manager

2.6 What Is the Process of Updating the Informant?

As part of our investigative process, Access Group Solutions will update the informant of the progress of the investigation. These updates can include the following:

- Access Group Solutions has confirmed the receipt of a report from the informant.
- Access Group Solutions has begun the investigative process.
- The investigation is currently ongoing.
- The investigation has been closed.

Access Group Solutions' commitment is that the informant will be updated where appropriate while the investigation is ongoing.

Access Group Solutions will strive to provide as much feedback on the investigation as possible. However, due to Access Group Solutions' privacy guidelines, there may be information that cannot be shared with the informant.

2.7 What If the Informant Is Not Satisfied with The Result?

If, after receiving the summarised report of the investigation, the informant is not satisfied with the result, they can escalate this to the General Manager. The informant can provide this escalation in writing so that a formal review can take place. While the General Manager commits to review the request, Access Group Solutions is under no obligation to reopen the investigation. If the General Manager concludes that the investigation was conducted properly and no new information exists that would change the results of the investigation, the investigation will be concluded.

Section 3: How Informants Are Protected

3.1 Anonymity After Submitting a Report

Section 2.2 discussed how an eligible person can remain anonymous during the process of submitting a report. After submitting a report, the following policies around anonymity are in place to protect an informant's identity.

- The informant has the right to remain anonymous and does not need to identify themselves at any time during the investigation process.
- At no time will Access Group Solutions force the informant to reveal their identity.
- The informant can refuse to answer questions they feel could identify themselves. If the informant reveals themselves at any time, we will document who will have access to their identity. This can include the case manager, Whistle-blower Program Manager, etc.

3.2 Potential Retaliation

An informant might be concerned that staff, management, or the organisation might retaliate against them. In this case, Access Group Solutions will protect the informant from the following detriment occurring as a direct result of making a report:

- Being terminated or having their employment ceased.
- Performance management.
- Harassment on the job or workplace bullying.
- Warnings or disciplinary actions.
- Discrimination.
- Any other action that can be perceived as retaliation for making a report.

The following actions are not considered to be detriment:

- reasonable administrative action taken to protect a discloser from detriment (e.g., relocating them to another office to prevent victimisation).
- managing unsatisfactory work performance of a discloser, in line with Access Group Solutions' usual performance management framework.

3.3 Considered Risk of Retaliation

In the case of "considered risk of retaliation", the informant believes retaliation is near or imminent, and they are targeted for retaliation. In cases of considered retaliation, the informant should contact the General Manager. The General Manager will take the action they feel is appropriate as well as come up with recommendations for how the situation can be resolved. Potential steps to protect the informant from a considered risk of retaliation can include:

- The informant taking leave.
- The informant being reassigned to other duties.
- The informant being reassigned to another location.

3.4 Already Retaliated Against

If the informant feels that they have already been retaliated against, they should escalate this immediately to the General Manager. The General Manager will take the action they feel is appropriate as well as come up with recommendations for how the situation can be resolved.

Potential steps to protect the informant after retaliation has occurred can include:

- The informant taking leave.
- The informant being reassigned to other duties.
- The informant being reassigned to another location.

3.5 Retaliation not Adequately Resolved

If the informant feels their report of retaliation was not resolved adequately, they can escalate this case in writing. The report will need to go to the Whistle-blower Report Manager (WRM), and they will investigate the matter and process for how the retaliation was dealt with. How Access Group Solutions Deals with Retaliation

It is an offence under the Corporations Act and the Taxation Administration Act to cause, or threaten to cause, detriment to a person because they have made, may have made, proposes to make, or could make a report of Wrongdoing and serious penalties apply for both individuals and corporations. A person who is subject to such detriment may also seek compensation or other remedies from a Court if they have suffered loss, damage, or injury because of making a report or because we failed to take reasonable precautions and exercise due diligence to prevent the detriment.

Access Group Solutions does not tolerate any attempts to retaliate against an informant who has made a report. Any employee or associated person found retaliating will face disciplinary action, including the potential to be terminated from their roles.
If you believe you have suffered detriment due to making a disclosure in accordance with this policy, you can make a complaint to one of the Disclosure Managers listed in section 2.1 or by contacting Your Call.

3.6 Separation of Issues

Access Group Solutions will be able to raise any issues related to work or performance related issues. While Access Group Solutions will protect the informant from any retaliation, it is also important that they are still effective in their job. Access Group Solutions can still raise any performance or contract issues with the informant as long as they are kept separate and not influenced at all from any reports that have been made.

3.7 Protection and Immunity for Others

Other parties that might have to bear witness or are involved in the investigation will be protected from retaliation in the same manner as the informant.

Access Group Solutions will take all reasonable steps to ensure that any employee who is the subject of a Wrongdoing report is afforded fair treatment and an impartial investigation in accordance with this policy. Generally, when an investigation is conducted, employees who are the subject of a report may be, within the constraints of confidentiality:

- told about the substance of the allegations.
- given a fair and reasonable opportunity to respond to the allegations before the investigation is finalised; and
- informed about the findings of the investigation and given an opportunity to respond to those conclusions before any action is taken against them (subject to legal, privacy and confidentiality requirements).

3.8 Legislative, Regulation Protection and Assistance

If in any jurisdictions or locales where Access Group Solutions operates has Whistle-blower protection laws that provide a higher level of protection than what is included in this policy, the local legislation will take precedence.

A person who makes a protected report is protected from any of the following legal actions for doing so:

- Civil liability (e.g., any legal action against you for breaching an employment contract, a duty of confidentiality or another contractual obligation).
- Criminal liability (e.g., legal action against you for unlawfully releasing information, or other use of the Protected Report against you in a criminal proceeding (other than for making a false disclosure).
- Administrative liability (e.g., disciplinary action for making the report).

You are still responsible for your own actions. These protections do not prevent action being taken against you for any Wrongdoing that you are involved in that is revealed in your report.

Section 4: Our Roles & Responsibilities

4.1 Roles

The roles within Access Group Solutions' Whistle-blower program include the following:

Name and Position	Location	Contact Details
Frederick Khoury Managing Director	129 Victoria Rd, GLADESVILLE NSW 2111	Office Tel 0298177788 fred@accessgroupsolutions.com.au
Jason Raj General Manager / Whistle-blower Program Manager	129 Victoria Rd GLADESVILLE NSW 2111	Office Tel 0298177788 jason.r@accessgroupsolutions.com.au
Rebecca Curran Compliance Manager / Whistle-blower Report Manager	129 Victoria Rd GLADESVILLE NSW 2111	Office Tel 0298177788 Mail: wbreport@accessgroupsolutions.com.au Post: **Marked "Strictly Private and Confidential")** **AGS Whistle-blower Report Manager** PO Box 219 Gladesville NSW 2111
Chris Delaney Principal Advisor Leadership & Employee Relations	129 Victoria Rd GLADESVILLE NSW 2111	Office Tel 0298177788 chris@accessgroupsolutions.com.au

4.2 Responsibilities

The following are the responsibilities of each role in Access Group Solutions' Whistle-blower program.

Program Manager: This individual owns the entire program and is measured on its overall success. This includes employees knowing and understanding the program, an easy process of making a report, investigating reports, as well as being a point of escalation for any concerns or retaliation that has taken place. While this individual reports into the organisation, the result of their work goes directly to the Managing Director.

Whistle-blower Report Manager (WRM): The Whistle-blower Report Manager (WRM) views incoming anonymous reports, assigns these reports to case managers, and manages them as they conduct investigations. This person is the first line of escalation and works collaboratively with case managers to ensure anonymous reports are heard and acted upon.

Case Managers: Case Managers will be assigned anonymous reports and their role is to investigate these reports. This includes interacting and asking questions of informants, as well as using the information provided to investigate the report submitted. Their investigation can be internal or external to the organisation depending on what was documented in the report. Their goal is to gather the facts and put forth a final report to management on what happened and what action they feel needs to take place.

People & Culture: People & Culture may be called upon to provide advice and guidance during any investigation. The Whistle-blower program leverages their expertise and acumen to ensure Access Group Solutions are using HR best practices during investigations and we are treating all employees fairly.

Section 5: Governance

5.1 Changes to Access Group Solutions' Whistle-blower Policy

From time to time, Access Group Solutions' Whistle-blower policy will need to change to keep up with our values, best practices, improvements, as well as legislation and regulations. Any changes to our Whistle-blower policy will be communicated with all employees and any relevant stakeholders. This policy and any changes made do form any contract of employment.

Any changes to Access Group Solutions' Whistle-blower policy must be approved by the Whistle- blower Committee which consist of the:

- Managing Director
- General Manager
- People and Performance Manager
- Compliance Manager

All changes will also be documented in Access Group Solutions' Whistle-blower policy and will be made available to all employees.

5.2 Reporting to the Whistle-blower Committee

The Whistle-blower Committee is updated every quarter on Access Group Solutions' Whistle-blower program, inclusive of de-identified reports, investigations, and results.

Reports or investigations carrying an undue amount of risk will be reported to the Whistle-blower Committee outside of the quarterly updates. The Whistle-blower Committee at any time can ask about anonymous reports, investigations, as well as the state of Access Group Solutions' Whistle- blower program. The Whistle-blower Committee is responsible and accountable for the implementation and effectiveness of Access Group Solutions' Whistle-blower program.

Appendix

Channels for Reporting

To be protected, the report may be made to one of the following people:

- A Disclosure Manager, as specified in section 2.1

- Access Group Solution's external whistleblowing service, Your Call, as specified in section 2.1

- A director or officer of Access Group Solution or one of the following senior managers:
    - Managing Director
    - General Manager
    - Finance Manager
    - Compliance Manager
    - Principal Advisor – Leadership & Employee Relations
    - People and Culture Manager
    - Business Manager
    - Another senior manager of Access Group Solutions who makes, or participates in making decisions that affect the whole, or a substantial part, of the business of Access Group Solutions or who has the capacity to significantly affect its financial standing.

- In accordance with the Corporations Act, a whistleblowing report may also be made externally to one of the following:
    - A legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the whistle-blower provisions in the Corporations Act.
    - ASIC, APRA, or a Commonwealth authority prescribed under the Corporations Act.
    - An actuary, auditor or member of an audit team conducting an audit of Access Group Solutions.
- A report under the Taxation Administration Act may also be made externally to the Commissioner for Taxation or a registered tax agent or BAS agent who provides tax agent services to Access Group Solutions.

Public interest disclosures

You may make a disclosure in the public interest to a member of parliament or a journalist if:

- you have previously made that disclosure to ASIC, APRA or another Commonwealth body prescribed by regulation; and
- at least 90 days have passed since the disclosure was made you do not have reasonable grounds to believe that action is being, or has been, taken to address the misconduct to which the previous disclosure related: and
- you have reasonable grounds to believe that making a further disclosure of the misconduct would be in the public interest; and
- after the end of the 90-day period you notify the body to whom you made the disclosure (ASIC, APRA, or other Commonwealth body) in writing with sufficient

information to identify the previous disclosure, and state that you intend to make a public interest disclosure to a member of parliament or a journalist; and
- the extent of the information disclosed in the public interest disclosure is no greater than is necessary to inform the recipient of the misconduct or the improper state of affairs or circumstances.

Emergency disclosures

You may make an emergency disclosure to a member of parliament or a journalist if:

- you previously made that disclosure to ASIC, APRA or another Commonwealth body prescribed by regulation.
- you have reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment.
- you notify the body to whom you made the disclosure (ASIC, APRA, or other Commonwealth body) in writing with sufficient information to identify the previous disclosure, and state that you intend to make an emergency disclosure to a member of parliament or a journalist.
- the extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the recipient of the substantial and imminent danger.

It is important to understand that a report may only be made to a journalist or a parliamentarian in the circumstances described above. You should seek independent legal advice before making a public interest disclosure or an emergency disclosure to a member of parliament or a journalist.

All Relevant Local Legislation/Regulation

In the definition of "reportable conduct", relevant Commonwealth laws include:

- The Corporations Act 2001
- The ASIC Act 2001
- The Modern Slavery Act 2018.
- Any other Commonwealth law that's punishable by imprisonment of 12 months or more. For example, the Competition and Consumer Act 2010 (cartel conduct), Income
- Tax Assessment Act 1936 and AML/CTF laws.

Related Policies

- Grievance Handling Policy
- Code of Conduct for Employees
- Legislative Compliance Policy