

**MATES 4 MATES**

Here for those  
impacted by service.

# **Whistleblower Protection Policy.**

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## Overview

At Mates4Mates (“**we, us, our, the Organisation**”) we are guided by our company values – integrity, compassion, collaboration, and innovation. These values are the foundation of how we conduct ourselves and interact with each other, our clients, members, suppliers, and other stakeholders. We are committed to ensuring corporate compliance and promoting ethical corporate culture by observing the highest standards of fair dealing, honesty and integrity in our business activities.

Our Whistleblower Protection Policy (“**Policy**”) forms part of our risk management framework, which includes our Enterprise Risk Management Policy, our Risk Appetite Statement and other associated risk policies.

## Purpose of this Policy

You may have concerns about conduct within Mates4Mates which appears to you to be illegal, unethical or otherwise improper, but you may feel apprehensive about raising your concerns because of the fear of possible adverse repercussions to you, for example, if your concerns relate to conduct of your manager.

This Policy is an important tool for facilitating the identification and investigation of wrongdoing that may not be uncovered unless there is a safe and secure means for disclosing wrongdoing.

The *Corporations Act 2001* and the *Tax Administration Act 1953* provide for protections for whistleblowers (“**Whistleblower Protection Scheme**” or the “**Scheme**”).

Under this Policy:

- you are encouraged to report your concerns, whether openly or, if preferred, anonymously
- if you report your concerns, you will be afforded confidentiality unless you indicate (or the law requires) otherwise
- concerns reported by you will be properly investigated with a view to establishing the truth and correcting any wrongdoing where possible
- you will be advised of the outcome of the investigation and any action taken as much as practicable
- you will not be victimised or adversely affected because of your action in reporting your concerns provided of course, that there is a basis for your concerns, and that you have acted in good faith and without malicious intent

We have established this Policy for the following reasons:

- to encourage disclosures of wrongdoing;
- to help deter wrongdoing, in line with the entity's risk management and governance framework;
- to ensure individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported;
- to ensure disclosures are dealt with appropriately and on a timely basis;
- to provide transparency around the entity's framework for addressing disclosures;
- to support the entity's values and code of conduct;
- to support the entity's long-term sustainability and reputation;
- to meet the entity's legal and regulatory obligations; and
- to align with the ACNC Corporate Governance Principles and relevant standards.

## Who the Policy applies to

This Policy applies to the following individuals if the individual is, or has been, any of the following:

- a) an officer or employee of Mates4Mates (e.g. current and former employees who are permanent, part-time, fixed-term or temporary, interns, secondees, managers, and directors);
- b) a supplier of services or goods to us (whether paid or unpaid), including their employees (e.g. current and former contractors, consultants, service providers and business partners);
- c) an associate of ours; and
- d) a relative, dependant or spouse of an individual from items (a), (b), or (c) above.

Any individual meeting the above criteria is defined as an **“Eligible Whistleblower”** or **“Discloser”**.

A Discloser qualifies for protection as a whistleblower under the Whistleblower Protection Scheme if they are an Eligible Whistleblower in relation to Mates4Mates and:

- a) they have made a disclosure of information relating to a **“disclosable matter”** directly to an **“eligible recipient”** or to ASIC, APRA or another Commonwealth body prescribed by regulation;
- b) they have made a disclosure to a legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the whistleblower provisions in the Corporations Act; or
- c) they have made an **“emergency disclosure”** or **“public interest disclosure”**.

## Matters this Policy applies to

Disclosures that are not about disclosable matters do not qualify for protection under the Whistleblower Protection Scheme.

However, a disclosure which does not relate to a disclosable matter but is made to a legal practitioner for the purposes of obtaining legal advice will be protected under the whistleblower protections of the *Corporations Act 2001*.

Disclosures that do not qualify for protection under the Whistleblower Protection Scheme may be protected under other legislation, such as the *Fair Work Act 2009*.

## Disclosable Matters

A disclosure qualifies for protection under the Whistleblower Protection Scheme if:

- a) the discloser has 'reasonable grounds';
- b) to 'suspect';
- c) that the disclosed information concerns:
  - a. misconduct or an improper state of affairs or circumstances in relation to the Organisation, or an officer or employee, or one of its related bodies corporate; or
  - b. indicates that the Organisation, a related body corporate or one of its or their officers or employees has engaged in conduct that
    - i. constitutes an offence against the Corporations Act or other specified financial services legislation;
    - ii. an offence against other Commonwealth legislation that is punishable by imprisonment for 12 months or more; or
    - iii. or represents a danger to the public or the financial system.

The misconduct or an improper state of affairs can be in respect of tax affairs.

Examples of disclosable matters includes:

- illegal conduct, such as theft, dealing in, or use of illicit drugs, violence or threatened violence, and criminal damage against property;
- fraud, money laundering or misappropriation of funds;
- offering or accepting a bribe;
- financial irregularities;
- failure to comply with, or breach of, legal or regulatory requirements;
- illegal activities that may constitute an indictable offence under Federal, State, or Territory Law;
- 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.

Disclosable matters include conduct that may not involve a contravention of law.

A discloser can still qualify for protection even if their disclosure turns out to be incorrect.

## **Personal work-related grievances**

Disclosures that relate solely to personal work-related grievances, and that do not relate to detriment or threat of detriment to the discloser, do not qualify for protection under the Whistleblower Protection Scheme.

Personal work-related grievances are those that relate to the discloser's current or former employment and have, or tend to have, implications for the discloser personally, but do not:

- have any other significant implications for Mates4Mates (or another entity); or
- relate to any conduct, or alleged conduct, about a disclosable matter.

Examples of personal work-related grievances are as follows:

- an interpersonal conflict between the discloser and another employee;
- a decision that does not involve a breach of workplace laws;
- a decision about the engagement, transfer or promotion of the discloser;
- a decision about the terms and conditions of engagement of the discloser; or
- a decision to suspend or terminate the engagement of the discloser, or to discipline the discloser.

A personal work-related grievance may still qualify for protection if:

- it includes information about misconduct, or information about misconduct includes or is accompanied by a personal work-related grievance (mixed report);
- Mates4Mates has breached employment or other laws punishable by imprisonment for a period of 12 months or more, engaged in conduct that represents a danger to the public, or the disclosure relates to information that suggests misconduct beyond the discloser's personal circumstances;
- the discloser suffers from or is threatened with detriment for making a disclosure; or
- the discloser seeks legal advice or legal representation about the operation of the whistleblower protections under the Corporations Act.

Personal work-related grievances should be reported in accordance with the Grievance Policy.

## **Vexatious and false disclosures**

Without wanting to limit a culture of reporting disclosable matters, a discloser will only be protected if they have 'reasonable grounds to suspect' that the information that they disclose concerns misconduct or an improper state of affairs or circumstances or other conduct falling within the scope of the Scheme.

The protections under the Scheme will not extend to vexatious complaints. If a disclosure was not made on reasonable grounds, it will not be protected. However, a discloser's motive for making a disclosure, or their personal opinion of the person(s) involved, does not prevent them from qualifying for protection.

Depending on the circumstances, it may be appropriate for the Company to take disciplinary action against any person who does not have objectively reasonable grounds for their disclosure.

## **Who qualifies to receive a disclosure**

### **Eligible recipients**

An eligible recipient includes:

- a) an officer or senior manager of the entity or related body corporate;
- b) the internal or external auditor or related body corporate;
- c) a person authorised by the entity to receive disclosures that may qualify for protection;
- d) the Commissioner of Taxation;
- e) Australian Securities and Investments Commission (ASIC); and
- f) Australian Prudential Regulation Authority (APRA).

The role of an eligible recipient is to receive disclosures that qualify for protection. A discloser needs to make a disclosure directly to one of the Organisation's eligible recipients to be able to qualify for protection as a whistleblower under this Policy and the Scheme.

We encourage you to make a disclosure to one of our internal or external eligible recipients in the first instance. Our approach is intended to help build confidence and trust in our whistleblower policy and procedures. We acknowledge that a discloser can make a disclosure directly to regulatory bodies, or other external parties, about a disclosable matter and qualify for protection under the Corporations Act without making a prior disclosure to Mates4Mates.

### **Legal practitioners**

Disclosures to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions in the Corporations Act are protected (even in the event that the legal practitioner concludes that a disclosure does not relate to a 'disclosable matter').

### **Regulatory bodies and other external parties**

Disclosures of information relating to disclosable matters can be made to ASIC, APRA or another Commonwealth body prescribed by regulation and qualify for protection under the Scheme.

ACNC is not an eligible recipient and protections under the Scheme will not be effective until a disclosure is made to an eligible recipient. However, ACNC does provide a factsheet regarding whistleblower protections – see <https://www.acnc.gov.au/tools/factsheets/whistleblower-protections>

## Journalists and parliamentarians

Disclosures can be made to a journalist or parliamentarian under certain circumstances and qualify for protection where the disclosure is either a:

- Public interest disclosure; or
- Emergency disclosure

### Public interest disclosure

A 'public interest disclosure' is the disclosure of information to a journalist or a parliamentarian, where:

- a) at least 90 days have passed since the discloser made the disclosure to ASIC, APRA or another Commonwealth body prescribed by regulation;
- b) the discloser does not have reasonable grounds to believe that action is being, or has been taken, in relation to their disclosure;
- c) the discloser has reasonable grounds to believe that making a further disclosure of the information is in the public interest; and
- d) before making the public interest disclosure, the discloser has given written notice to the regulatory body to which the previous disclosure was made that:
  - i. includes sufficient information to identify the previous disclosure; and
  - ii. states that the discloser intends to make a public interest disclosure.

### Emergency disclosure

An 'emergency disclosure' is the disclosure of information to a journalist or parliamentarian, where:

- a) the discloser has previously made a disclosure of the information to ASIC, APRA or another Commonwealth body prescribed by regulation;
- b) the discloser has 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;
- c) before making the emergency disclosure, the discloser has given written notice to the body to which the previous disclosure was made that:
  - i. includes sufficient information to identify the previous disclosure; and
  - ii. states that the discloser intends to make an emergency disclosure; and
- d) the extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the journalist or parliamentarian of the substantial and imminent danger.

It is important for the discloser to understand the criteria for making a public interest or emergency disclosure. A disclosure must have previously been made to ASIC, APRA or a prescribed body and written notice provided to the regulatory body to which the disclosure was made. In the case of a public interest disclosure, at least 90 days must have passed since the previous disclosure.

A discloser should contact an independent legal adviser before making a public interest disclosure or an emergency disclosure.



## Making a disclosure

### Internal reporting

Any report under this Policy can be made internally via any of the following:

- to your relevant Business Unit General Manager
- to the Head of Finance, Governance and Risk
- to the CEO
- to the Chair of the Board
- via Mates4Mates secure anonymous communications online application (located on the Mates4Mates intranet)

### External reporting

If an internal report is not appropriate or you do not feel comfortable using our internal reporting services, you may report to officers and senior managers of Mates4Mates' related entities, audit or actuarial teams (as applicable) and, in certain circumstances, to ASIC and other Commonwealth authorities. However, we encourage you to use our internal processes in the first instance.

### Anonymous disclosures

Disclosures can be made anonymously and still be protected under the Whistleblower Protection Scheme.

A discloser can choose to remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised. A discloser can refuse to answer questions that they feel could reveal their identity at any time, including during follow-up conversations. In addition, it is suggested that a discloser who wishes to remain anonymous should maintain ongoing two-way communication with the entity, so the entity can ask follow-up questions or provide feedback

The following measures and/or mechanisms are available for protecting your anonymity:

- Communication may be made via the online form found on the Mates4Mates intranet
- A pseudonym may be adopted for the purpose of your disclosure and to protect your identity.

## Legal protections for disclosers

The following protections under the Scheme are available to you if you qualify as a Discloser and the disclosure is made to a person who qualifies to receive a disclosure under this Policy:

- identity protection (confidentiality);
- protection from detrimental acts or omissions;
- compensation and other remedies; and
- civil, criminal and administrative liability protection

Protections apply not only to internal disclosures, but to disclosures to legal practitioners, regulatory and other external bodies, and public interest and emergency disclosures.

### Identity protection (confidentiality)

We cannot disclose the identity of a discloser or information that is likely to lead to the identification of the discloser. An exception to this protection is if we disclose the identity of the discloser:

- to ASIC, APRA, or a member of the Australian Federal Police (within the meaning of the *Australian Federal Police Act 1979*);
- to a legal practitioner (for the purposes of obtaining legal advice or legal representation about the whistleblower provisions in the Corporations Act);
- to a person or body prescribed by regulations; or
- with the consent of the discloser.

We can disclose the information contained in a disclosure with or without the discloser's consent if:

- the information does not include the discloser's identity;
- we have taken all reasonable steps to reduce the risk that the discloser will be identified from the information; and
- it is reasonably necessary for investigating the issues raised in the disclosure.

It is illegal for us to identify a discloser or disclose information that is likely to lead to the identification of the discloser, outside the exceptions noted above.

A discloser can lodge a complaint with Mates4Mates about a breach of confidentiality by contacting the Head of Finance, Governance and Risk.

A discloser may also lodge a complaint with a regulator, such as ASIC, APRA or the ATO, for investigation.

### **Protection from detrimental acts or omissions**

Mates4Mates or its representatives cannot engage in conduct that causes detriment to a discloser (or another person), in relation to a disclosure, if:

- a) the person believes or suspects that the discloser (or another person) made, may have made, proposes to make or could make a disclosure that qualifies for protection; and
- b) the belief or suspicion is the reason, or part of the reason, for the conduct.

Mates4Mates or its representatives cannot make a threat to cause detriment to a discloser (or another person) in relation to a disclosure. A threat may be express or implied, or conditional or unconditional. A discloser (or another person) who has been threatened in relation to a disclosure does not have to actually fear that the threat will be carried out.

Detrimental conduct includes the following:

- dismissal of an employee;
- injury of an employee in his or her employment;
- alteration of an employee's position or duties to his or her disadvantage;
- discrimination between an employee and other employees of the same employer;
- harassment or intimidation of a person;
- harm or injury to a person, including psychological harm;
- damage to a person's property;
- damage to a person's reputation;
- damage to a person's business or financial position; or
- any other damage to a person.

Certain actions by Mates4Mates or its representatives that are not deemed detrimental conduct under law are:

- administrative action that is reasonable for the purpose of protecting a discloser from detriment (e.g. moving a discloser who has made a disclosure about their immediate work area to another office to prevent them from detriment); and
- managing a discloser's unsatisfactory work performance, if the action is in line with the entity's performance management framework.

## **Compensation and other remedies**

A discloser (or any other employee or person) can seek compensation and other remedies if:

- a) they suffer loss, damage or injury because of a disclosure; and
- b) the entity failed to take reasonable precautions to prevent the detrimental conduct.

We encourage you to seek independent legal advice before filing for compensation or other remedy through the courts.

## **Civil, criminal and administrative liability protection**

A Discloser qualifying for protection is protected from the following in relation to their disclosure:

- a) civil liability (e.g. any legal action against the discloser for breach of an employment contract, duty of confidentiality or another contractual obligation);
- b) criminal liability (e.g. attempted prosecution of the discloser for unlawfully releasing information, or other use of the disclosure against the discloser in a prosecution (other than for making a false disclosure)); and
- c) administrative liability (e.g. disciplinary action for making the disclosure).

The protections under this Policy and the Scheme do not grant immunity for any misconduct a discloser has engaged in that is revealed in their disclosure.

## **Support and practical protection for disclosers**

The following measures will be provided by us to support disclosers and protect disclosers from detriment.

### **Identity protection (confidentiality)**

Below are examples of how Mates4Mates will protect the confidentiality of the Discloser's identity.

Reducing the risk that the discloser will be identified from the information contained in a disclosure:

- all personal information or reference to the discloser witnessing an event will be redacted;
- the discloser will be referred to in a gender-neutral context;
- where possible, the discloser will be contacted to help identify certain aspects of their disclosure that could inadvertently identify them; and
- disclosures will be handled and investigated by qualified staff.

Secure record-keeping and information-sharing processes:

- all paper and electronic documents and other materials relating to disclosures will be stored securely;
- access to all information relating to a disclosure will be limited to those directly involved in managing and investigating the disclosure;

- only a restricted number of people who are directly involved in handling and investigating a disclosure will be made aware of a discloser's identity (subject to the discloser's consent) or information that is likely to lead to the identification of the discloser;
- communications and documents relating to the investigation of a disclosure will not be sent to an email address or to a printer that can be accessed by other staff; and
- each person who is involved in handling and investigating a disclosure will be reminded about the confidentiality requirements, including that an unauthorised disclosure of a discloser's identity may be a criminal offence.

## **Protection from detrimental acts or omissions**

We are committed to protecting disclosers from detriment and may offer the following measures and mechanisms to enable this:

- placing the eligible whistleblower on temporary paid leave as applicable;
- redeploying the eligible whistleblower to another role, either temporarily or permanently as applicable;
- relocating the eligible whistleblower either temporarily or permanently;
- processes for assessing the risk of detriment against a discloser and other persons (e.g. other staff who might be suspected to have made a disclosure), which will commence as soon as possible after receiving a disclosure;
- support services (such as Employee Assistance Program) that are available to disclosers;
- ensure that management are aware of their responsibilities to maintain the confidentiality of a disclosure, address the risks of isolation or harassment, manage conflicts, and ensure fairness when managing the performance of, or taking other management action relating to, a discloser; and
- intervene where detriment appears to already have occurred and take steps to stop the detrimental action and remedy its impact.

A discloser may seek independent legal advice or contact regulatory bodies, such as ASIC, APRA or the ATO, if they believe they have suffered detriment.

## **Handling and Investigating a Disclosure**

### **Handling a disclosure**

We will need to assess each disclosure to determine whether:

- a) it qualifies for protection; and
- b) a formal, in-depth investigation is required.

We encourage a discloser to determine whether the location and time are appropriate:

- for the discloser to make their disclosure comfortably; and
- for ensuring the discloser is protected.

We will focus on the substance of a disclosure, rather than what we believe to be the discloser's motive for reporting. We will not assume that disclosures about conduct or behaviour that appear to have had a personal impact on a discloser are somehow less serious. The discloser's experience may indicate a larger or systemic issue.

## **Investigating a disclosure**

Investigation processes will vary depending on the precise nature of the conduct being investigated. The purpose of the investigation is to determine whether or not your concerns are substantiated, with a view to Mates4Mates then rectifying any wrongdoing uncovered to the extent that this is practicable in all the circumstances.

Without the discloser's consent, we cannot disclose information that is likely to lead to the identification of the discloser as part of our investigation process—unless:

- a) the information does not include the discloser's identity;
- b) we remove information relating to the discloser's identity or other information that is likely to lead to the identification of the discloser; and
- c) it is reasonably necessary for investigating the issues raised in the disclosure.

We may not be able to undertake an investigation if we are not able to contact the discloser.

If we determine that we will need to investigate a disclosure, we will need to determine:

- who will conduct the investigation (the “Investigator”);
- the nature and scope of the investigation;
- the person(s) within and/or outside the entity that should lead the investigation;
- the nature of any technical, financial or legal advice that may be required to support the investigation; and
- the timeframe for the investigation.

We will follow best practice in performing an investigation. Investigations will be objective, fair and independent, while preserving the confidentiality of the investigation. We will engage the services of an external investigation firm when additional specialist skills or expertise are required.

The Investigator is responsible for investigating the reportable conduct and advising any other relevant Mates4Mates business area as appropriate so that a plan can be developed to investigate the disclosure.

All investigations will be conducted in a manner that is consistent with the rules of natural justice and devoid of bias or prejudice against the employee or any person against whom the allegation is made.

## **Keeping a discloser informed**

A discloser will be provided with regular updates, if the discloser can be contacted (including through anonymous channels). The frequency and timeframe may vary depending on the nature of the disclosure.

A discloser's anonymity will not be compromised when providing updates.

When possible, we will provide an acknowledgement to a discloser after receiving their disclosure.

Further, when possible, we will provide updates to a discloser during the following stages of an investigations:

- when the investigation process has begun;
- while the investigation is in progress; and
- after the investigation has been finalised.

## **Documenting investigation findings**

Findings from an investigation will be document and reported to those responsible for oversight of the Policy, while preserving confidentiality of the Discloser.

The method for documenting and reporting the findings will depend on the nature of the disclosure. There may be circumstances where it may not be appropriate to provide details of the outcome to the discloser.

A discloser may lodge a complaint with a regulator, such as ASIC, APRA or the ATO, if they are not satisfied with the outcome of the entity's investigation.

## Ensuring fair treatment of individual's mentioned in a disclosure

We will ensure the fair treatment of all Mates4Mates employees who are mentioned in a disclosure that qualifies for protection, including those who are the subject of the disclosure.

We will utilise the following measures and/or mechanisms for ensuring fair treatment of individuals mentioned in a disclosure:

- disclosures will be handled confidentially, when it is practical and appropriate in the circumstances;
- each disclosure will be assessed and may be the subject of an investigation;
- the objective of an investigation is to determine whether there is enough evidence to substantiate or refute the matters reported;
- when an investigation needs to be undertaken, the process will be objective, fair and independent;
- an employee who is the subject of a disclosure will be advised about the subject matter of the disclosure as and when required by principles of natural justice and procedural fairness and prior to any actions being taken—for example, if the disclosure will be the subject of an investigation; and
- an employee who is the subject of a disclosure may contact the entity's support services.

## Policy accessibility

### Disclosers within Mates4Mates

The Policy will be made available to officers and employees (where applicable) by:

- holding staff briefing sessions and/or smaller team meetings;
- posting the policy on the staff intranet or other communication platform;
- posting information on staff noticeboards;
- setting out the policy in the employee handbook; and
- incorporating the policy in employee induction information packs and training for new starters.

We will take reasonable measures to ensure that employees are aware of the how to apply this Policy to their daily work interactions at Mates4Mates and are aware of its implications for them.

### Disclosers outside of Mates4Mates

The Policy is hosted on the Mates4Mates website.

## Training

We will take reasonable measures to ensure that employees are aware of, and understand this Policy, and the types of behaviour or scenarios that are reportable.

## Associated Documents

- Employee Code of Conduct
- Employee Assistant Program
- Performance Management Policy
- Workplace Health and Safety Policy
- Directors Code of Conduct
- Termination of Employment Policy
- Employee - Conflicts of Interest Policy

## Further Assistance

Further information regarding this Policy can be obtained by contacting your Manager or the Head of Finance, Governance and Risk.

## Document History

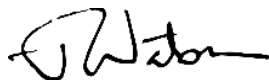
Version/s	Responsible Officer	Governing Authority	Approving Authority	Date Approved	Comments
1.0	NA	NA	Managing Director	9 December 2014	
1.1	HR Manager	General Manager Corporate Services	Chief Executive Officer	15 June 2018	Content and format updated.
2.0	Head of Finance, Governance and Risk	Chief Executive Officer	Board of Directors	27 January 2020	Content and format updated to comply with the changes to Corporations Act 2001 that take effect 1/January/2020  ASIC Regulatory Guide 270 used to update the policy
2.1	Multimedia Creative Specialist	General Manager Marketing and Engagement	Chief Executive Officer	14 February 2020	Updated branding / template

### Review Date

December 2020

### Authorisation

Authorising Officer:



Chief Executive Officer