



Whistleblower Policy

Purpose:

This policy sets out the process for DOOLEYS employees and contractors to report concerns of possible unethical, unlawful or undesirable conduct without fear of reprisal and with the support and protection of DOOLEYS. It also sets out the investigation process which DOOLEYS is committed to follow on receipt of a whistleblowing report, and DOOLEYS commitment to rectify any wrongdoing verified by the investigation to the extent practicable in all the circumstances.

Coverage:

This policy applies to all employees and Directors.

Reporting Process:

DOOLEYS has several channels for reporting a wrongdoing. While we ask that you first raise any concerns with your manager or People & Learning, we recognise that you may not always feel comfortable discussing certain matters with them. Accordingly, KPMG, an independent service provider, has been engaged to operate a *FairCall* telephone hotline and reporting service for DOOLEYS.

Circumstances that you may wish to report:

As a guide, the circumstances in which it is appropriate to raise a concern (either using the *FairCall* service or internal DOOLEYS channels) are as follows:

- Conduct or practices which are suspected to be illegal or in breach of any law, regulation or code of conduct applying to DOOLEYS or any significant breach of a contract by an employee or director;
- Suspected fraudulent or corrupt practices (such as misappropriation of funds, bribery, undue influence, false information etc.);
- Concerns about continuing or regular breaches of DOOLEYS's policies or other rules of conduct;



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- Concerns about misleading or deceptive conduct of any kind (e.g. statements that are factually incorrect);
- Situations within DOOLEYS' control that may present a significant risk to the health or safety of people or a significant danger to the environment;
- Concerns about inappropriate staff behaviour (such as bullying, harassment, discrimination, drug abuse and other similar behaviours) that is not appropriate to discuss with your line manager or with People & Learning;
- Concerns that DOOLEYS (or any of its subsidiaries) or an officer or employee of any member of the DOOLEYS group has, or may have, contravened the Corporations Act or the Australian Securities and Investment Commission Act 2001

You should of course contact the police immediately if, in your judgement, this is the appropriate course of action under the circumstances. Examples might include crimes against persons or property (for example, burglary).

Confidentiality:

Reports may be submitted anonymously. Should a person choose to disclose their identity at the time of submitting their report, their identity will be kept confidential and will not be publicly disclosed by DOOLEYS. Section 1317AE of the Corporations Act provides that a person to whom a wilful disclosure (in respect of a breach of this Act) is made (including DOOLEYS) must comply with specific confidentiality requirements in order to protect your anonymity. In relation to the details of the report itself, all efforts will be made to also keep the report confidential, subject to the need to conduct an adequate investigation. All documents, reports and records relating to the investigation of a *FairCall* report will be confidentially stored and retained in an appropriate and secure manner.

No director or employee who in good faith reports a violation of this policy shall suffer harassment, retaliation or adverse consequence. An employee or director



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who retaliates against someone who has reported a violation in good faith will be subject to disciplinary action.

FairCall Reporting Mechanism:

Calls will be received by KPMG *FairCall* at any time. The operators taking the call on this hotline are not associated with DOOLEYS. They are trained and experienced specialists dedicated to dealing with whistleblowers and their concerns. Callers will be provided with a confidential reference number by the *FairCall* operator. The *FairCall* operator will then prepare a *FairCall* report which details the report as reported by the caller. All *FairCall* reports are forwarded to DOOLEYS's Whistleblower Protection Officer (WPO) or the Chairperson of the Audit & Risk Committee depending upon the severity. The WPO is currently the Chief Financial & Information Officer.

Investigation Process:

The investigation processes will vary depending on the precise nature of the conduct being investigated. All investigations must be conducted in a manner that is fair and objective to all people involved. For example, a report will not be investigated by someone who is implicated in the concern. The WPO is the designated representative for protecting the interest of whistleblowers and all reports, anonymous or otherwise, will be investigated in accordance with this Policy. The WPO will have access to independent financial, legal and operational advisers as required and, for serious allegations, will be assisted by the Audit & Risk Committee.

Roles and Responsibilities:

Anyone making a report concerning any of the circumstances referred to above under the heading *circumstances that you may wish to report* must be acting in good faith and have reasonable grounds for believing the information disclosed indicates such conduct. While reports can be anonymous, any allegations which prove to have been made maliciously or knowingly to be false will be investigated



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and viewed as a serious disciplinary offence. No action will be taken where the report was made in good faith but no wrongdoing was identified.

Further Information:

For further information regarding this policy please contact the Chief Financial & Information Officer on (02) 8745 6198.

Additional information on FairCall can be found on DOOLEYS HQ, alternatively *FairCall* can be contacted on 1800 500 965.