

1. Purpose

Brotherhood of St. Laurence (“BSL”) and its subsidiaries are committed to legal, ethical, and moral behaviour.

We know that any genuine commitment to detecting and preventing illegal or unethical conduct must include a way to report concerns freely and without fear of repercussion.

This procedure provides such a mechanism and encourages our people to report such conduct, while providing protection to the person making the report.

2. Scope

This procedure applies to all our people* who have reasonable grounds to suspect *Potential Misconduct*. BSL will not tolerate anyone being discouraged from speaking up, or being adversely affected because they have reported misconduct in accordance with this procedure.

This procedure and its protections **do not** apply to personal work-related grievances. BSL can provide better support and address concerns raised by BSL staff about interactions at work (work-related grievances) if the matter is raised with your line manager or Human Resources directly.

3. Definitions

*Our People

Includes persons:

- a) who are or have been associated with BSL and its subsidiaries, including employees, volunteers, BSL Board members, contractors, suppliers, apprentices, trainees, work experience students, members; or
- b) who are the spouse, relative or dependent of a person listed in (a).

Whistleblower

A person who makes a report or disclosure of potential misconduct directly to a Whistleblower Officer, or via the [Stopline service](#).

Whistleblower Officer

A person authorised by BSL to receive and investigate disclosures of potential misconduct within the organisation. These people are responsible for protecting the interests of the whistleblower, including maintaining confidentiality as far as possible and protecting them from detriment as a result of their report.

Whistleblower Protections

Protections provided to Whistleblowers to enable them to come forward to report misconduct without fear of retribution or personal detriment.

4. Whistleblower Protections

These protections include confidentiality and protections from discrimination in the workplace against a Whistleblower. What constitutes adequate protection will be assessed on a case-by-case basis, but could, if deemed necessary, include appropriate changes to working arrangements while the issue is being investigated, or beyond.

BSL will ensure that the Whistleblower will not suffer any detriment which includes:

- (a) dismissal
- (b) causing injury to their employment
- (c) alteration of position or duties to their disadvantage
- (d) discrimination
- (e) harassment or intimidation of a person
- (f) harm or injury to a person, including psychological harm
- (g) damage to a person's property, reputation, business, financial position, and any other form of damage.

If you believe that you or your family have been subject to detrimental treatment because of your status as a Whistleblower, you should immediately inform a Whistleblower Officer, the Executive Director or a member of the BSL Board.

5. What is Potential Misconduct?

Potential Misconduct is any suspected or actual misconduct (unacceptable behaviour), or an improper state of affairs or circumstances in relation to BSL. This includes if you have reasonable grounds to suspect that a BSL director, executive, manager, team member, contractor, supplier, tenderer or other person who has dealings with BSL has engaged, or attempted to engage in conduct which:

- is illegal;
- constitutes an offence against or a contravention of a law;
- represents a danger to the public or the financial system;
- is fraudulent or involves the misappropriation of funds;
- involves the offering or accepting of a bribe;
- is systemic harassment or unlawful discrimination;
- constitutes modern slavery, which exists if a person is not working of their own free will, is treated like property, or is seriously exploited or abused. Examples of modern slavery are human trafficking, slavery and slavery-like practices, forced labour, servitude, early and forced marriage, debt bondage and forms of child labour;
- is threatening against a person who has made a disclosure or is believed to have made, or be planning to make, a disclosure.

Whistleblower

Note: *Reasonable grounds to suspect* is based on the reasons for the discloser's suspicion.

An allegation with no supporting information is not likely to be considered as having 'reasonable grounds to suspect'. However, you do not have to prove the allegation to qualify for protection, even if the disclosure turns out to be incorrect.

6. Procedure

i. Making a protected disclosure

A report involving potential misconduct should include as much detail as possible.

You can raise your concern to one of the BSL's Whistleblower Officers, who are also available to advise you if you need help with your disclosure:

- **Simon Miller**, Company Secretary and General Counsel: simon.miller@bsl.org.au
- **Julie Ware**, Chief Services Officer: julie.ware@bsl.org.au
- **Randolph Head**, Risk and Resilience Manager: randolph.head@bsl.org.au

If you prefer, you can make a report through **Stopline** – the Whistleblower Hotline 24 hours a day, 7 days a week on 1300 304 550 or:

- BSL@stoline.com.au
- Stopline 365 app (available on Google Play or the App Store)

Your report can be anonymous and/or confidential if you choose. You also have the option of disclosing your identity to Stopline but not to BSL. Anonymous whistleblowers still qualify for protection.

If you choose to remain anonymous, it would still be helpful to have a way to contact you (such as an email address) so that ongoing communication can be maintained throughout the investigation and beyond for follow-up questions and feedback. You can choose not to answer such questions if you are concerned about revealing your identity. Sometimes it may not be possible to investigate if you cannot be contacted and there is not enough information.

ii. Investigation

All reports of *potential misconduct* under this policy will be treated seriously and confidentially and will be assessed to determine whether the report:

- qualifies for protection; and
- requires an in-depth investigation.

All our people are expected to cooperate fully with any investigations and maintain confidentiality.

In all cases:

- The Whistleblower Officer will be responsible for the investigation, including determining appropriate place(s) and time(s) for the disclosure to take place to maximise discloser's comfort.
- The Whistleblower Officer may consult with another Whistleblower Officer or external legal counsel to determine how BSL will respond to and/or report the matter (unless the other Whistleblower Officer is the subject of the complaint).
- The investigation will be conducted fairly and without bias.

Whistleblower

- Any person against whom an allegation is made will be given the opportunity to respond.
- The Whistleblower (you) will be kept informed of the investigation's progress and any relevant / appropriate outcome (subject to privacy considerations).
- If information is shared that is identified as confidential, you must maintain confidentiality.
- BSL is committed to implementing the findings and recommendations of any investigation to rectify any wrongdoing as far as is practicable.
- The Whistleblower Officer(s) must submit the final investigation report to the Executive Director (or the Chair of the Board if the complaint is against the Executive Director). This report will be the property of BSL and will remain confidential.
- Where an investigation identifies a breach of the BSL Code of Conduct, disciplinary action may be taken, including terminating employment or engagement of the person(s) involved in the *Potential Misconduct*. If there has been a suspected or an actual breach of the law, BSL may refer to the matter to the relevant legal authority.
- The Whistleblower Officers will be responsible for preparing periodic reports on the number and type of whistleblower reports for the Nominations, Governance & People Committee and to the Board.
- In cases where the Executive Director, a Whistleblower Officer or a member of the Committee has been accused of *Potential Misconduct*, or where they have a close personal relationship with the person against whom the accusation is made, they will be excluded from the reporting process.

iii. Outcome

Appropriate action will be taken in accordance with the BSL Code of Conduct, or by the relevant legal authority if a breach of the law has occurred.

Whistleblowers will be informed of the investigation's progress and outcome, if appropriate.

They are also protected from any repercussions for their action in reporting the potential misconduct.

If you believe you have suffered detrimental treatment as a result of whistleblowing you should contact an Executive, or your HR representative.

7. Malicious Reporting

If you raise a concern maliciously, or knowing it to be untrue, you may be subject to disciplinary action (including employment termination) or other legal action.

8. Other Complaint Mechanisms

The Whistleblowing Procedure does not replace other reporting structures such as those for child protection matters, grievance and dispute resolution, discrimination or matters relating to workplace bullying or harassment.

An exception is where the issue is wrongdoing of a serious nature, but the existing reporting system failed to process the issue or processed it in a substantially inappropriate, grossly unfair, or heavily biased manner.

9. Document Control Information

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