

Whistle Blower Policy & Procedure

OVERVIEW

To ensure high standards of professional and ethical workplace conduct and practices, Buildcorp Group believes it is vital our employees and contractors – and their relatives, spouses, dependents, and associates – can raise genuine concerns about conduct, activities or practices without fear of reprisal.

OBJECTIVES

The purpose of this policy is to:

- ▼ encourage and support the reporting of actual and suspected wrongdoing and misconduct
- ▼ give whistle blowers both legal and practical protection
- ▼ ensure individuals mentioned in a disclosure are treated fairly

ELIGIBILITY

If you fall into one of the categories below, you are an ‘eligible whistleblower’ for the purposes of the Corporations Act 2001 (Cth).

- ▼ employees or contractors
- ▼ sub-contractor or supplier
- ▼ a relative or dependent of anyone who falls into the previous categories

If you are an eligible whistleblower who reports a ‘disclosable matter’ to an ‘eligible recipient’, you may qualify for whistleblower protection under the Act. We explain more about when you qualify for protection below.

DEFINITIONS

Term	Definition
Reportable conduct (disclosure)	<p>Reportable conduct may include:</p> <p>Fraud, theft, or dishonest conduct (including falsification of records)</p> <p>Bribery, corruption, money laundering or secret commissions</p> <p>Illegal, unethical, or improper conduct (drug use, violence, criminal damage)</p> <p>Breach of employment, labour or workplace health and safety or any other laws</p> <p>Conduct that damages our reputation or brand or relationships with third parties</p> <p>Breach of an internal policy (e.g., Code of Conduct or Ethical Business Behaviour Policy)</p>

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	<p>Breaches of confidentiality and disclosure of confidential information</p> <p>Representing a danger to the public or the financial system</p> <p>Any other inappropriate behaviour, misconduct or improper state of affairs</p> <p>An offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more prescribed by regulations under the Corporations Act, 2001</p>
Non – reportable matters	<p>Reports related to “personal work-related grievances” will not be covered by whistleblower protections. Workplace grievances will remain the jurisdiction of the Fair Work Act 2009.</p> <p>A personal work-related grievance is defined as “a grievance about any matter in relation to the discloser’s employment, or former employment, having (or tending to have) implications for the discloser personally”.</p>
Whistleblower Protection Officer (WPO)	<p>A senior member of Buildcorp who is responsible, as far is reasonably practicable, to protect Whistleblowers and is accountable for the provisions of this Policy.</p>
Whistleblower Investigations Officer (WIO)	<p>A senior member of Buildcorp who is responsible for assessing, leading, coordinating or overseeing the investigation of protected Whistleblower disclosures in a fair, confidential, objective (without bias) and timely manner.</p>

WHISTLEBLOWER PROTECTIONS

Whistleblower protections are the protections provided to eligible whistleblowers to enable them to come forward to report misconduct without fear of retribution or personal detriment.

The Corporations Act protects a whistleblower against certain legal actions related to making the whistleblower disclosure, including:

- ▼ criminal prosecution (and the disclosure cannot be used against the whistleblower in a prosecution, unless the disclosure is false)
- ▼ civil litigation (such as for breach of an employment contract, duty of confidentiality, or other contractual obligation), or
- ▼ administrative action (including disciplinary action).

If you are the subject of an action for making a whistleblower disclosure, you may rely on this protection in your defence. This protection does not grant immunity to you for any misconduct that you were involved in that is revealed in the disclosure.

How you are protected

Protecting your identity: we will not share your identity, or information that is likely to lead to your identity being known, unless you give your consent, or it is allowed by law. We will always ask for your consent before disclosing your identity or any of the information you provide to another party.

Ensuring fairness: we are committed to ensuring you are treated fairly and that you are not disadvantaged or discriminated against because of speaking up. We will assess your report and take all reasonable and appropriate actions to consider, investigate and resolve the issues raised. Each report will be treated on its own merits in terms of the appropriate action or response but in all circumstances, we are committed to ensuring fairness to all parties involved.

Providing Support: we understand and acknowledge that speaking up can be difficult and we are committed to providing support to you, and any other impacted party, throughout the process. As part of that commitment, you will have access to Buildcorp's Whistleblower Protection Officer (WPO). Our WPO is responsible for ensuring protections under this policy are enforced and maintained.

If you have any questions or concerns regarding the protections that apply to you, and the support being provided, you are encouraged to contact the Whistleblower Protection Officer (WPO).

REPORTING

When to report

You are encouraged to speak up if you have reasonable grounds to suspect any misconduct, wrongdoing or illegal conduct involving Buildcorp or its employees. This includes any breaches of the law, our Code of Conduct or anything else you feel may be impacting Buildcorp its employees, customers, or stakeholders. Making a report under this policy may be considered as 'reportable conduct'.

How to report

We encourage you to speak up and disclose any suspected or actual wrongdoing or illegal activity directly with our Managing Director tony_sukkar@buildcorp.com.au

Buildcorp has additional eligible recipients that you can make your report should you wish, these are:

- ▼ General Manager or Chief Financial Officer
- ▼ Head of People and Culture (WPO)

You can also make a disclosure of reportable conduct to a member of parliament or a journalist in exceptional or 'emergency' situations however we encourage you to make your report to Buildcorp where practicable in the first instance.

Anonymous reporting

You can choose to remain anonymous or reveal your identity when speaking up and making a protected disclosure. If you wish to remain anonymous, please contact us via mail to

Whistleblower Protection Officer (*Private & Confidential*)
Buildcorp Group
Level 4, 10 Mallet Street
Camperdown NSW 2050

REPORT HANDLING

Upon receipt of a report, our WPO will assess the report and obtain as much information as possible. All information will be documented and securely stored to ensure we can maintain confidentiality of your report and protect your identity. The WPO will take the time required to build rapport, display empathy, and elicit the appropriate amount of information from you. The more information you can provide during the reporting process the better, as this will enable Buildcorp to make an informed and considered assessment of the most appropriate response.

Depending on the issue being raised, an investigation may be required. If an investigation is required, the Whistleblower Investigation Officer (WIO) will be responsible for overseeing or conducting the investigation whilst the Whistleblower Protection Officer (WPO) will be your point of contact for ensuring you are protected and supported throughout the process.

In some cases, the WIO may appoint an external investigator to undertake an investigation on our behalf. The duration of a formal investigation will depend on the circumstances including the number of allegations, witnesses, and other factors.

You can receive updates, provide more information, and ask questions regarding your report and the investigation by contacting the WIO, WPO or investigator.

MANAGEMENT CONTROLS

Through the implementation of this policy we:

- ▼ encourage those witnessing illegal conduct, fraud, money laundering, bribery, compliance breaches or threatening behaviour to whistle blowers to disclose these issues to a Buildcorp officer, senior manager, or auditor so we can address wrongdoing as early as possible
- ▼ handle disclosures confidentially and determine whether there is sufficient evidence to substantiate or refute the matters reported
- ▼ appoint an officer to manage investigations, which may include conducting interviews, collating and assessing evidence, preparing reports and reporting to relevant entities.
- ▼ undertake investigations objectively, fairly and independently
- ▼ not reveal the identity of a discloser, or information likely to identify them, without their consent – except, where necessary, in an ASIC, APRA or Australian Federal Police matter.

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- ▼ protect disclosers from detrimental acts or omissions in the workplace and from civil, criminal, and administrative liability in relation to their disclosure
- ▼ notify the individual who is the subject of the disclosure of any adverse findings against them
- ▼ ensure the policy and its procedures are easily accessible by posting them on Buildcorp's website and intranet and, on request, providing them by email to any employee or contractor.

RESPONSIBILITY & ACCOUNTABILITY

Position	Accountability
Managing Director	Policy owner and oversight of policy across the Group
General Managers	Implementation of policy and procedures
Chief Financial Officer	Whistleblower Investigation Officer
Head of People and Culture	Whistleblower Protection Officer

RELATED POLICIES & DOCUMENTS

- ▼ Modern Slavery Statement 2021
- ▼ Ethical Business Conduct Policy
- ▼ Employee Code of Conduct
- ▼ Supplier Code of Conduct

APPROVAL & REVIEW

Position	Role	Date	Next Review
Head of People & Culture	Owner	20 March 2023	June 2025
Managing Director	Approver	20 March 2023	