

# SCHAFFER CORPORATION LIMITED

## WHISTLEBLOWER POLICY

### 1. Introduction

Schaffer Corporation Limited and its controlled entities (“SFC” or “the Company”) is committed to the highest standards of conduct and ethical behaviour in conducting its business and to promoting and supporting a culture of honest and ethical behaviour. This includes ensuring all its officers and employees, act at all times in compliance with all laws and in compliance with SFC’s Code of Conduct.

SFC recognises that any genuine commitment to detecting and preventing illegal and other undesirable conduct must include, as a fundamental cornerstone, a mechanism whereby employees and others can report their concerns freely and without fear of repercussion.

This policy provides such a mechanism and encourages the reporting of such conduct.

### 2. Purpose

This policy aims to achieve the following benefits for the Company:

- Promote an open and transparent culture within SFC.
- Encourage employees, directors, contractors, suppliers, partners and consultants to report an issue if they genuinely believe a person or persons has breached SFC’s Code of Conduct, policies or the law.
- Demonstrate SFC’s commitment to a fair workplace and outline the process for managing matters of Misconduct.
- Protect individuals who in good faith, report Misconduct which they reasonably believe to be corrupt, illegal or unethical on a confidential basis, without fear of reprisal, dismissal or discriminatory treatment.
- Assist in ensuring that matters of Misconduct and/or unethical behaviour are identified and dealt with appropriately.

### 3. Who does this policy apply to?

This policy applies to all employees, officers, contractors, partners and consultants of SFC, whether full time, part time, casual or any level of seniority wherever employed.

### 4. What is Misconduct?

All employees are encouraged to report any genuine matters on behaviours that they honestly believe contravenes SFC’s Code of Conduct, the Company policies, or the law. For the purposes of making a report under this Policy, Misconduct may include any actual or suspected

- Dishonest, fraudulent, corrupt or unlawful conduct or practices.
- Misleading or deceptive conduct, including conduct or representations which amount to improper or misleading accounting or financial reporting practices.

- Conduct or any proposed conduct, bid, proposal, offer, contract, product or other aspect of SFC's business that breaches the provisions of any Australian legislation (Commonwealth or State) or in countries SFC does business with.
- Coercion, harassment or discrimination by, or affecting, any member of SFC or its affiliates.
- A breach of SFC policies or Code of Conduct.
- Conduct within SFC's control which is a significant danger to the environment.
- Conduct endangering the health and safety of any person or persons which has been reported to management but not acted upon.
- Any action taken against, or harm suffered by, a person as a result of making a report under this Policy.
- Any other conduct or act which may cause loss to SFC or which may otherwise be detrimental to its interests.

Misconduct does not generally include personal work-related grievances. Work-related grievances are grievances related to your employment that have implications for you personally (such as a disagreement between you and another employee). Generally, these grievances should be raised under the relevant company policy or dispute resolution process, to allow those issues to be resolved effectively.

When reporting Misconduct, an employee is expected to have reasonable grounds to believe the information being disclosed is true. No penalty will apply if the information turns out to be incorrect. Where a person has knowingly made a false report, this will be considered a serious matter and will result in disciplinary action.

## **5. How can a matter be reported?**

If you become aware of any Misconduct which you consider contravenes SFC's Code of Conduct, SFC's policies, or the law, then you should:

- (a) Take the matter up with your immediate supervisor or manager; or
- (b) Report the matter to more senior management or Human Resources personnel; or
- (c) In instances where you wish to remain anonymous, contact the SFC Company Secretary where you can raise your concerns anonymously and privately.

## **6. What happens after a report is made**

All reported concerns will be documented, investigated appropriately and where appropriate, feedback regarding the investigation's outcome will be provided to you.

The necessary course of action will be taken in response to a report and if no action is taken you will be given an explanation.

For instances where you wish to remain anonymous, your identity and the fact that you have made a report and the contents of the report will be kept confidential and no details of your participation in this process will be included in your personnel file or performance review.

The report will not be disclosed to anyone except those who are actively involved in investigating the matters raised in the report.

## **7. What happens to you?**

There are special protections for whistleblowers who disclose information concerning misconduct or an improper state of affairs or circumstances in relation to the Company under the Corporations Act and others for tax whistleblowers.

You will not be discriminated against or disadvantaged in your employment with the Company, for making a report in accordance with this policy nor will you receive reprisals due to your actions in making a report.

The Company will take all reasonable steps to ensure that adequate and appropriate protection is being provided to those who, in good faith, make a report. This protection applies if the matter is proven or not, regardless of whether it is reported to the external service provider.

SFC will only share your identity as a whistleblower if:

- (a) You consent;
- (b) The concern is reported to the Australian Securities and Investments Commission (ASIC), the Australian Prudential Regulation Authority (APRA), the Tax Commissioner or the Australian Federal Police (AFP); or
- (c) The concern is raised with a lawyer for the purpose of obtaining legal advice or representation

If SFC needs to investigate a report, it may disclose information that could lead to your identification, but it will take reasonable steps to reduce this risk.

Any disclosures of your identity of information likely to reveal your identity will be made on a strictly confidential basis.

## **8. Group reporting procedures**

The SFC Board will receive a summary of reports made under this policy on a quarterly basis. The Board will be provided with additional information about any material incidents raised.