

Whistleblower Policy

1. Commitment and Objectives

Peoplecare recognise the value of complying with the laws and standards that apply to us in our work and encourages everyone to report misconduct. Peoplecare will not tolerate corrupt, illegal or other undesirable conduct nor condone victimisation of anyone who intends to disclose or has disclosed misconduct.

Our objectives are to:

- Encourage and allow persons to disclose misconduct.
- Ensure disclosures are properly and lawfully dealt with.
- Support and protect everyone involved in the disclosure from victimisation and retaliation.
- Ensure the identity of those making a disclosure (Whistleblower) and the content of the disclosure are kept confidential.
- Ensure compliance with the Whistleblower requirements prescribed in the *Corporations Act 2001 (Cth)* (the "Act") and *APRA Prudential Standard CPS520 Fit and Proper*.

2. Who Does This Policy Apply To?

- 2.1. This policy applies to current and former employees, officers, and contractors, as well as their spouses, dependants, and other relatives, and anonymous disclosures of Peoplecare Health Limited ("Peoplecarers").
- 2.2. This policy applies to the group of people defined in section 2.1 for the Reserve Bank Health Society Ltd and National Health Benefits Australia Pty Ltd (Onemedifund) who, for the purpose of this policy, will also be referred to as Peoplecarers.

3. What Misconduct Should Be Disclosed?

- 3.1. Where a Peoplecarer has seen or has reasonable grounds to suspect misconduct, or an improper state of affairs or circumstances, concerning Peoplecare, they should report it ("disclosure").
- 3.2. Misconduct includes, but is not limited to:
 - Dishonest, corrupt or illegal conduct.
 - Theft, fraud or misappropriation.
 - Damage/sabotage, violence, drug and alcohol use.
 - Significant risks to health and safety.
 - Serious inappropriate or unethical conduct.
 - Serious misuse of information.

- Bullying, discrimination, harassment or other serious unacceptable behaviour.
- Serious breach of our policies and procedures or the law.
- Substantial waste of company resources.
- Victimising someone for making or being involved in a disclosure under this Policy.
- Causing substantial financial or non-financial loss or detriment to Peoplecare.
- Other serious improper conduct.

4. Making a Disclosure

- 4.1. Information and advice about making a disclosure or the support and protection available can be obtained by having a confidential discussion on the matter with the Peoplecarers immediate manager or the Head of People, Culture and Capability. Peoplecare may be compelled to act on information provided if the information reasonably suggests that misconduct has or may occur. **Appendix A** also provides examples of reporting mechanism for different types of misconduct applicable to this and other Peoplecare policies.
- 4.2. Peoplecarers can also seek their own independent legal advice for further information relating to a disclosure.
- 4.3. A disclosure may be made:
 - Anonymously to Peoplecare's independent Whistleblower service provider – Your Call (See **Appendix A**);
 - To one of the internal Whistleblower Officers (as outlined in **Appendix B**); or
 - To external authorities and entities (for example – APRA or ASIC); Your Call is also able to facilitate this disclosure to external authorities if required.
- 4.4. A discloser is not required to provide absolute proof of misconduct, though where possible they should provide as much detail and evidence as possible to allow a fair and thorough investigation into the disclosure.
- 4.5. If a Peoplecarer is unsure about if a matter qualifies as a whistleblower disclosure they are still encouraged to use any of the reporting channels outlined under section 4.3 of this policy. Peoplecare will review the disclosure as outlined under this policy and assess if it qualified as an eligible disclosure.
- 4.6. There is no requirement for a whistleblower to identify themselves for a disclosure to qualify for protection under the Act.

5. Legal Protections Available to Whistleblowers

- 5.1. Disclosures made by persons detailed under section 2.1 of this policy, about matters detailed under section 3.2 of this policy are considered eligible disclosure and qualify for legal protections outlined in section 5.2 of this policy.

- 5.2. There are a number of legal protections available under the law to whistleblowers who meet the criteria set out in section 2.1 of this policy. These protections are:
- Identity protection (confidentiality);
 - Protection from detriment;
 - Compensation and other remedies; and
 - Civil, criminal and administrative liability protection.
- 5.3. It is an offence for Peoplecare to breach the 'confidentiality' and 'protection from detriment' protections detailed under section 5.1 of this policy.

6. Peoplecare Will:

- 6.1. Treat disclosures in the strictest confidence by:
- storing all reports and records relating to a disclosure securely and only providing access to authorised employees, including for disclosures made through Your Call.
 - Not disclosing a Whistleblower's identity unless consent to disclose their identity is provided or the disclosure is required by law and/or it is necessary to prevent a serious threat to a person's health or safety.
- 6.2. Receive any disclosure directly or through Your Call and:
- Upon assessment of the information provided (process for which is defined in the Whistleblower Procedure), take the best course of action, including determining whether an investigation is required and the process for this. Where possible, Peoplecare will attempt to resolve the disclosure internally and informally.
 - Ensure that any investigation is conducted in a constructive, impartial and lawful way according to the principles of natural justice and procedural fairness.
 - Provide a report to the Chief Risk Officer with the findings of the investigation and where the disclosure is proven provide recommendations for further actions that may be taken in respect of the findings.
 - Ensure the Whistleblower is kept informed of the relevant progress and outcome of the disclosure, as far as is legally permissible and subject to privacy and confidentiality requirements.
 - Refer the information in the disclosure and the findings of an investigation that has revealed conduct that may constitute a legal or criminal offence or when required to do so by law to the relevant external agency.
- 6.3. Support Peoplecarers by:
- Doing everything reasonably possible to support and protect anyone who intends to or does make a disclosure, is mentioned in a disclosure, acts as a witness or otherwise assists with the investigation and resolution, from victimisation and will investigate all reports of victimisation.

- Providing support in line with our Employee Assistance Program for those people mentioned or involved in a disclosure.
- Providing immunity from internal disciplinary action to Peoplecarers who make a disclosure where they had reasonable grounds for suspecting misconduct has or may have occurred; and they have not engaged in serious misconduct or illegal conduct relating to the disclosure.

6.4. Provide disciplinary action to any Peoplecarer that has knowingly made a false or misleading disclosure.

6.5. Ensure the legal protections identified in section 6 of this policy are provided to all qualifying whistleblower disclosures.

6.6. Provide a confidential summary for the disclosure and investigation findings to the Board via the Board's Risk Committee, to ensure that action on any misconduct is driven at Board level. For all severe disclosures a report must be provided directly to the Board as quickly as possible. If any misconduct is associated with a director or executive, that person will be excluded from any Board deliberations on dealing with the misconduct.

7. Every Person's Responsibility

Peoplecarers have a responsibility to:

- Remain alert to misconduct.
- Report known or suspected misconduct in accordance with this policy.
- Act in a way that reduces, prevents or stops misconduct.
- Support (and not victimise) those who have made or intend to make a disclosure.
- Ensure the identity of the Whistleblower and the person/s who is the subject of the disclosure are kept confidential.

8. Policy Access

Peoplecare's Whistleblower policy is available internally on the Policy Centre and the Governance, Risk and Compliance Whistleblowing page on Peoplepedia , and publicly on its website.

9. Policy Review

The Policy will be reviewed every 3 years by the Board.

Appendix A

Provided you feel comfortable to do so, Peoplecare encourages employees to raise the matter directly with their Team Leader or Manager in the first instance. If you do not feel comfortable raising the matter with your direct manager, the below matrix outlines the most appropriate person/system to notify.

Misconduct	Example	Related Policy	Notification
Dishonest, corrupt or illegal conduct	Theft, fraud or misappropriation	<ul style="list-style-type: none"> Whistleblower policy 	Your Call
Serious criminal record, false or stolen identity, falsified qualifications, etc	Failed police check	<ul style="list-style-type: none"> Fit and Proper Policy 	CRO / CFO / APRA
Bullying, discrimination, harassment or other serious unacceptable behaviour	Threats made towards a fellow employees	<ul style="list-style-type: none"> Anti-Bullying Policy Internal Grievance policy Performance Management Policy 	Head of People, Culture and Capability

For any dishonest, corrupt or illegal misconduct, that requires reporting to Your Call:

Phone: 1300 790 228 and note the organisation ID PEO1952

Web: www.yourcall.com.au/report and note the organisation ID PEO1952

Appendix B

Whistleblower Protection Officers:

Brett Wright – Chief Risk Officer

Email: Brett.Wright@peoplecare.com.au

Phone: 02 4224 4826

Holly Allen – Governance Manager

Email: Holly.Allen@peoplecare.com.au

Phone: 02 4224 4360