

Corporate Whistleblower Policy

Policy name: Corporate Whistleblower Policy
Version: Final version — October 2013
 Previous version — 2010

	Details	Authority
Version status:	Approved by the Chief Executive Officer and accepted by the Board of Campbell Page	Board of Directors and Chief Executive Officer of Campbell Page
Next review date:	Every two years	Board of Directors, Campbell Page Limited (Campbell Page)
Related CAMPBELL PAGE policies:	Campbell Page Code of Conduct Campbell Page Fraud and Corruption Control Policy	
Distribution:	Campbell Page Intranet	

Contents

1. Purpose, Scope and Coverage	2
2. Procedures for Reporting a Matter.....	3
3. What Happens When Communication is Received from a Whistleblower?.....	3
4. Anonymity of the Whistleblower.....	4
5. Communication With the Whistleblower.....	4
6. Protection of the Whistleblower.....	4

1. Purpose, Scope and Coverage

Campbell Page is committed to ensuring the organisation and all its employees act at all times in compliance with all laws, and in compliance with the ethical standards, as set out in the Code of Conduct.

Campbell Page recognises that any genuine commitment to detecting and preventing illegal and other undesirable conduct must include, as a fundamental cornerstone, a mechanism whereby staff members and others can report their valid concerns freely/ in confidence and without fear of repercussion. This Policy provides such a mechanism and encourages the reporting of such conduct.

This Policy aims to provide the following outcomes:

- more effective compliance with laws;
- a healthier and safer work environment;
- more effective management;
- improved morale; and
- a record of the fact that Campbell Page takes its governance obligations seriously.

Definitions

- 1.1. **Whistleblower:** A whistleblower is a person who raises a concern or allegation about wrongdoing or improper conduct occurring in an organisation or body of people. Such persons can be employees, directors or external parties like service users, engaged consultants or contractors.
- 1.2. **Protected Disclosure:** Any good faith communication based on reasonable grounds that discloses or demonstrates an intention to disclose information that may evidence an improper conduct.

Application

- 1.3. This Policy applies to Campbell Page and parties identified under the definition of a whistleblower.

Types of matters that should be reported under this Policy

- 1.4. Any conduct by any person employed by, who holds an office in, or is otherwise connected with Campbell Page, which in the view of the whistleblower, acting in good faith, is:
 - Corrupt.
 - Dishonest.
 - Fraudulent.
 - Illegal (including theft, drug sale or use, violence, threatened violence, criminal).

- Unlawful or contrary to any state or federal legislation.
- Unethical.

Such conduct can involve:

- Substantial mismanagement of Campbell Page resources;
- Substantial risk to public health or safety;
- Substantial risk to the environment;
- A criminal offence and/or which has reasonable grounds for disciplinary action for terminating the services of a Campbell Page employee, directors or contractor who was, or is, engaged in that conduct.

2. Procedures for reporting a matter

2.1. Whistleblowers can report matters, whether anonymously or not, through any of the channels described below:

- a) In the first instance, to their immediate supervisor;
- b) Alternatively, to the General Manager, People, Performance & Culture or their delegate
- c) Alternatively to our external whistle-blower hotline facility (Navex)
- d) Alternatively, to the Chief Executive Officer

When a whistleblower makes a report, utilising channels (a) to (c) indicated above, the Chief Executive Officer must be informed on a timely basis for matters of a significant nature.

2.2. In addition to the Whistleblower Policy, reference is also made to the overall framework of grievance resolution mechanisms within Campbell Page. No staff member or director of Campbell Page can be involved in receiving whistleblower-related communication or the conduct of investigations involving themselves.

3. What happens when communication is received from a Whistleblower?

3.1. All referrals of the reportable conduct will be the subject of a thorough investigation with the objective of locating evidence that either substantiates or refutes the claims made by the whistleblower. Evaluations of such matters can consider factors such as the cost or value involved; the nature of the allegation; identity of the persons against whom allegations are made; the prospect of compiling sufficient evidence; the risk of damages incurred and any security implications.

3.2. Depending on the nature of the disclosure, the investigation will be conducted by an independent party inside or outside the relevant business division, as nominated by the Chief Executive Officer - and this party will follow best practice in investigations and be fair and impartial. The rules of natural justice will be observed in that the

investigation will be conducted without bias and any person against whom an allegation is made will be given the opportunity to respond.

- 3.3. The outcomes of any whistleblower-related investigation are to be reported to the Chief Executive Officer in the first instance. The General Manager, People, Performance and Culture, is to be informed accordingly.
- 3.4. Campbell Page, when undertaking any related investigation, may engage external professionals to assist in any investigation process.

Public and Media Communications about Fraud

- 3.5. The Chief Executive Officer of Campbell Page, or a person designated by the Chief Executive Officer, is the only person authorised to issue any communication on behalf of Campbell Page to external parties concerning any fraud allegation or incident.

4. Anonymity of the Whistleblower

- 4.1. If requested accordingly, the identity of the whistleblower will be kept confidential in any investigation carried out.
- 4.2. Any commitment of confidentiality is subject to the requirements of the law, which may require disclosure of the identity of the whistleblower in legal proceedings. Information obtained from a whistleblower will only be disclosed to the extent necessary to conduct an investigation into the matter, or if the whistleblower consents to the disclosure, or as may be required by law.
- 4.3. Unauthorised disclosure of information other than in accordance with this Policy may be the subject of disciplinary proceedings, including summary dismissal.

5. Communication with the Whistleblower

- 5.1. The party carrying out investigations may need to obtain the whistleblower's contact information for follow up questions. If a whistleblower has documentation about the suspected unlawful behaviour he or she is reporting, and can provide such electronic or hard copy documentation, the investigating party may not need to know the identity of the whistleblower. However, if the initial information provided proves to be insufficient to process with a more thorough investigation, and the whistleblower has declined to provide contact information, the investigating party may have difficulty proceeding with the investigation.
- 5.2. In handling matters involving whistleblowers, consideration is to be taken of the requirements of the Privacy Act 1988. Click [here](http://www.austlii.edu.au/au/legis/cth/consol_act/pa1988108/) for more information.
- 5.3. The General Manager, People, Performance & Culture is the central Campbell Page contact for communication with the whistleblower subsequent to a matter being raised.

6. Protection of the Whistleblower

- 6.1. Whistleblowers who report matters in good faith, and provided he or she has not been involved in the conduct reported, will not be penalised or personally disadvantaged because they have reported a matter, by any of the following:

- Dismissal
 - Demotion
 - Any form of Harassment
 - Discrimination
 - Bias
- 6.2. A whistleblower who believes he or she, or his or her family, has been the victim of any of the above by reason of their status as a whistleblower, should immediately report the same to the Chief Executive Officer.
- 6.3. Any staff member or director who is found to have dismissed, demoted, harassed or discriminated against a whistleblower by reason of their status as a whistleblower, may be subjected to disciplinary measures, including summary dismissal.
- 6.4. Whistleblowers who are involved in improper conduct themselves are not protected from the consequences of such behaviour. A person's liability for their own conduct is not affected by the same person's disclosure of that conduct.

Confidentiality

- 6.5. All information received by Campbell Page concerning suspected or actual fraudulent conduct will be collected, considered and handled in a way that has regard to the law, privacy, confidentiality, fairness and legal privilege.