

Speak Up Policy

Policy Owner	People & Safety
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Contents

Purpose.....	2
Policy statement	3
Definitions.....	3
Scope and Application	4
Who is covered by this policy?	4
When does this Policy apply?	5
Responsibilities.....	5
Making a report.....	6
Reporting actual or suspected improper conduct.....	6
Reporting Improper Conduct outside the company	6
Confidentiality.....	6
What information should be provided?	7
Making an anonymous Disclosure	8
How Wilson will respond	8
Initial Response.....	8
Investigation Process	8
Reporting to the Board	9
Illegality	9
Protections for Disclosers	9
Discloser Protection	9
Support available under this Policy.....	10
Protecting Disclosers from detriment.....	10
Legal Protections	11
Personal support	11
Where to go if you have questions	11
Policy Review	11



Purpose

Wilson is committed to high standards of corporate governance, ethical conduct, integrity and safety.

This Policy explains:

- what to report (Improper Conduct) and what is not covered
- who can report and who can receive a protected disclosure
- how to report (internal and external options) without fear of reprisal or intimidation
- how we deal with confidentiality
- how reports are assessed and investigated
- legal protections available under the *Corporations Act 2001* (Cth) and the *Taxation Administration Act 1953* (Cth)

The purpose of this Policy is to:

- encourage all individuals to report any concerns regarding actual or suspected illegal, unethical or unacceptable conduct;
- explain how to make a disclosure and what protections a Discloser will receive;
- outline the processes at Wilson for responding to disclosures; and
- promote a workplace environment in which everyone feels safe, supported and encouraged to speak up.

Actual or suspected illegal, unethical or unacceptable conduct is referred to in this Policy as Improper Conduct (defined below).

Wilson's attitude is **"when in doubt: report it"**

This Policy is a part of Wilson's Code of Conduct Framework, which endeavours to promote and maintain a professional working environment based on honesty and ethical behaviour and in which everyone feels safe, supported and encouraged to report Improper Conduct.

A failure to make a report about Improper Conduct may expose Wilson to additional risks and undermine our culture and values.



Policy statement

Complying with this Policy is a requirement of ongoing employment or engagement with Wilson.

Any person who engages in Improper Conduct including, but not limited to fraud, corruption or conduct which amounts to a deliberate and serious breach of applicable laws, in the course of his/her normal duties may be subject to disciplinary action up to and including termination of employment or the engagement.

Any person who makes a report about Improper Conduct to Wilson must not be subject to victimisation, reprisal or retribution because of their actions.

A breach of this Policy (including victimisation, reprisal or retribution of a Discloser) may also result in disciplinary action.

Any person or organisation who has any concern about any Improper Conduct or non-compliance with Wilson policies, procedures or applicable laws by any Wilson employee, consultant or contractor is invited to make a disclosure in accordance with this Policy or lodge a grievance in accordance with the Grievance Policy, as applicable.

Definitions

Improper Conduct means misconduct (including fraud, negligence, default, breach of trust and breach of duty), an improper state of affairs or circumstances, a breach of the law, or danger to the public or the financial system.

Examples of Improper Conduct include, but are not limited to, the following:

- a breach of regulations or laws;
- dishonest, unethical or corrupt behaviour, including soliciting, accepting or offering a bribe, facilitation, payments or other such benefits;
- fraudulent activity e.g. falsification or alteration of accounting or other documents, theft of assets, suppression or omission of the effects of transaction from records and documents, recording of transactions without substance, misuse of private and confidential information for personal gain, and misuse of Wilson's resources for personal gain;
- illegal activity (including any breach of the *Competition and Consumer Act 2010* (Cth) or *Corporations Act 2001* (Cth), theft, drug sale/use, violence or threatened violence and property damage);
- impeding internal or external audit processes;
- improper behaviour relating to taxation, accounting, internal accounting controls, actuarial, or audit matters;
- conduct that creates a risk to the health and safety of employees, contractors, consultants, suppliers, public health or safety, or the environment;
- conduct that represents a danger to the public or the financial system;
- substantial mismanagement of Wilson's resources;
- unauthorised use of Wilson's confidential information;



- corrupt conduct with the use of intentional deception to obtain an illegal advantage, or provide an illegal advantage to an employee, contractor, supplier of another third party;
- giving to customers, or receiving from a supplier, gifts and/or entertainment which is, or could be seen as, a kickback, bribe or pay off to a customer or from a supplier;
- payments to a government entity or official for the purpose of obtaining or retaining a business opportunity or other advantage;
- anti-competitive behaviour;
- victimisation or harassment;
- accepting or providing offers of promises of an illegal advantage by doing or not doing certain functions in the course of an individual employment;
- conduct that is detrimental to Wilson's business and/or reputation; and
- concealment of Improper Conduct.

Discloser means the person reporting Improper Conduct under the terms of this Policy.

Disclosure means a report of actual or suspected Improper Conduct made by a Discloser in accordance with this Policy.

Personal work-related grievances: Issues that relate only to a person's own employment (e.g., performance, roster, interpersonal conflict) are normally handled under the Respectful Behaviour Policy and Complaints Procedure, unless they also involve Improper Conduct.

Scope and Application

Who is covered by this policy?

This Policy applies to:

- Wilson and all subsidiary and affiliate entities over which it exercises control; and
- all of Wilson's current and former officers, employees, consultants, contractors, suppliers (including employees of suppliers, and associates, as well as these people's relatives and dependants (or dependants of their spouse)).

Wilson encourages everyone to speak up about Improper Conduct. People must not discourage any individual from making a disclosure and to do so may be a breach of this Policy. If any person is told not to raise a concern, even by their supervisor/manager, a person in authority or a Disclosure Officer, they are encouraged to make a further Disclosure (to a different Disclosure Officer where required).



When does this Policy apply?

The application of our Policy is not limited to the workplace or standard working hours. Our expectations for how our people behave and conduct themselves extend to any work-related context including but not limited to work travel; attending external events such as conferences or training; work functions or parties; and when entertaining clients, providers or customers.

This Policy does not apply to grievances about any matter in relation to an individual's employment that has (or tends to have) implications for the individual personally (except where the matter also involves Improper Conduct). Complaints relating to an individual's own personal circumstances, such as interpersonal conflicts or decisions regarding their employment or the way they have been treated at work, should be raised by following the process in the Grievance Policy.

Responsibilities

All Individuals: are encouraged to report any known or suspected instances of Improper Conduct in accordance with this Policy. Individuals are responsible for familiarising themselves and complying with this Policy. This responsibility extends to contractors and consultants.

All individuals are responsible for behaving in a fair and legal manner and to be seen to be doing so. All individuals must comply with and support any investigation or other process being undertaken under this Policy, and comply with their confidentiality obligations referred to below.

All managers/supervisors: may from time to time receive information that appears to be Disclosures under this Policy. They are required to notify a Disclosure Officer as soon as reasonably possible following receipt of the information.

They must be aware of and comply with their confidentiality obligations referred to below, particularly where the individual does not consent to their identity being disclosed. Managers/supervisors (other than officers or senior managers) are not authorised to receive Disclosures.

Disclosure Officers: are designated with responsibility for receiving Disclosures, or reports of potential Disclosures from managers/supervisors, undertaking an initial review, and, where appropriate, referring the matter to an Investigating Officer for further investigation (see below for current Disclosure Officer contact information).

Investigating Officers: are to investigate the substance of Disclosures referred to them by Disclosure Officers, in order to determine whether there is evidence in support of the matters raised which may need to be taken further. Investigating Officers must report the findings of any investigation, as described below.

Workplace Relations Counsel: are responsible for providing procedurally relevant guidance and support in the interpretation of this Policy and supporting relevant parties in the resolution of any reported situation.

People & Safety representatives may from time to time also receive information that appear to be Disclosures under this Policy. They must notify a Disclosure Officer as soon as reasonably possible following receipt of the information and must be aware of and comply with their confidentiality obligations referred to below, particularly where the Discloser does not consent to their identity being disclosed. People & Safety representatives who are not Disclosure Officers are not authorised to receive Disclosures.



For the avoidance of doubt, Disclosure Officers are authorised by Wilson to receive Disclosures under Part 9.4AAA of the *Corporations Act* and Part IVD of the *Taxation Administration Act*.

Making a report

Reporting actual or suspected improper conduct

The Disclosure may be made to:

- to the external, independent reporting service (“the Wilson Group Speak Up Service”) –
 - via the internet (www.wilsongroupspakeup.deloitte.com.au);
 - by calling 1800 325 033; or
 - by emailing wilsongroupspakeup@deloitte.com.au
- any officer or senior manager of Wilson;
- Wilson’s auditor or actuary; or
- a designated Disclosure Officer.

The role of Disclosure Officers is to ensure that the Discloser is heard by Wilson and appropriate follow-up occurs, as well as to ensure that the Discloser feels supported and protected. The Disclosure Officer will, where appropriate, refer a matter to an Investigating Officer for further investigation. The investigation process is described below.

The current Disclosure Officers are:

- **Lara Donnini**, Chief People Officer on +61 3 9224 0244
(email: lara.donnini@wilsongroupau.com);
- **Paul Brazier**, General Manager Risk and Compliance on +61 3 9936 3406
(email: paul.brazier@wilsonsecurity.com.au);
- **Georgia Simmonds**, Group Workplace Relations Counsel on +61 3 9224 0210
(email: georgia.simmonds@wilsongroupau.com)

Reporting Improper Conduct outside the company

Nothing in this Policy should be interpreted as restricting an individual from raising issues or providing information to an external party, in accordance with any relevant law, regulation or other code or standard. Wilson strongly encourages individuals to seek advice before reporting a concern to anyone external. Individuals will not suffer detriment for raising concerns with a lawyer for the purpose of taking advice about this Policy, or protections under the law.

Confidentiality

Wilson, and anyone who receives, investigates or has knowledge of a Disclosure made under this Policy, must:

- treat information about or revealed by the Disclosure as confidential;



- only disclose information about or revealed by a Disclosure where there is a legitimate reason for doing so (for example, in connection with an investigation into a Disclosure, or for the purpose of taking advice or complying with any reporting obligations);
- **never** disclose the Discloser's identity (and any information that Wilson has because of their disclosure that someone could likely use to work out the Discloser's identity), **including to any other Wilson employee**, unless:
 - the Discloser gives their consent;
 - the disclosure is allowed or required by law, including where the disclosure is to ASIC or the Australian Federal Police, or to a lawyer for the purpose of obtaining legal advice; or
 - in the case of information likely to identify the Discloser (but not the Discloser's identity itself), it is reasonably necessary to disclose the information for the purposes of an investigation, but all reasonable steps are taken to prevent someone from working out the Discloser's identity.

Participants in the investigation procedure are required to keep confidential all relevant information, and electronic recordings of any investigation meetings are not permitted unless all those attending agree.

Anyone who fails to comply with their confidentiality obligations under this procedure will be dealt with in accordance with Wilson's usual disciplinary processes. There are also obligations of confidentiality under the law, a breach of which may lead to prosecution or civil penalties.

What information should be provided?

For a Disclosure to be investigated, it should contain sufficient information to allow Wilson to form a reasonable basis that the report is genuine, and to take further steps to.

A Disclosure can be oral or in writing and the Discloser should, where possible, provide:

- the nature of the suspected Improper Conduct;
- all relevant facts giving rise to the suspicion of Improper Conduct, including any supporting evidence;
- the name of the relevant Wilson division;
- where the suspected Improper Conduct has arisen or occurred; and
- the names of the persons involved.

Where possible, the person receiving a Disclosure will ask the Discloser:

- to confirm that, to the best of their knowledge, they have provided true and accurate information of the events that have occurred and that led to the Disclosure; and
- whether the Discloser consents to the disclosure of their identity (and any information that Wilson has because of their Disclosure that someone could likely use to work out the Discloser's identity).



Making an anonymous Disclosure

Disclosures can be made anonymously if the Discloser does not want to reveal their identity. However, sometimes anonymous Disclosures limit the extent of information available for consideration and investigation, and limit Wilson's ability to seek further information from the Discloser and investigate the matter effectively.

In all cases, the Disclosure Officer (or other person receiving the disclosure) will seek the Discloser's consent before recording the Discloser's name. Disclosers should feel supported and safe in providing information, and able to consent to the limited sharing within Wilson of their identity. Disclosers are encouraged to provide their name, as this will assist Wilson's investigation of the disclosure. However, they are not required to do so, and if the Discloser elects to remain anonymous, Wilson will investigate the Disclosure as best as possible in the circumstances. An investigation may not be possible unless sufficient information is provided.

Anonymous Disclosers may, if they wish, decide to provide a discrete email address for communication, without disclosing their identity, to enable a level of follow up.

How Wilson will respond

Recipients of a Disclosure should refer to the Wilson Group Whistleblower Guide for further information regarding the steps to be taken when a Disclosure (or potential Disclosure) is received.

Initial Response

Once received by the Disclosure Officer, the Disclosure Officer will consider whether the information provided is a Disclosure under this Policy and applicable legislation and determine whether the matter warrants further investigation by an Investigating Officer.

If so, the Disclosure Officer may refer the matter to an Investigating Officer. Confidentiality requirements must be maintained. As all situations are different, where an investigation of Improper Conduct takes place, it will be conducted in a manner appropriate to the circumstances.

Investigation Process

The investigation process, the decision as to who investigates and the extent of any investigation, will vary depending on matters such as the nature of the Improper Conduct alleged, and the amount and detail of information provided.

The investigation process will usually be managed by the Investigating Officer appointed by the Disclosure Officer. Where appropriate, the Investigating Officer will be assisted by other Wilson employees and/or external advisers.

Disclosures made under this Policy will be received and treated sensitively and seriously and will be dealt with fairly and objectively. Wilson will apply the protections described below when responding to or investigating Disclosures.



If appropriate, Disclosers may be told how Wilson has decided to respond to their Disclosure, including whether an investigation will be conducted. This may not occur until after an investigation has been concluded. However, it may not always be appropriate to provide Disclosers with this information.

Other people, including employees or external advisers, may also be asked to assist or conduct the investigation. Any investigation commenced will be conducted in a timely manner appropriate to the circumstances and will be fair and independent from any persons to whom the Disclosure relates. Depending on the circumstances, Wilson may appoint an internal or external investigator, or other additional resources (for example, a specialist with IT or forensic investigatory skills) seconded internally or sourced externally where required.

All employees, consultants and contractors must cooperate fully and honestly with any investigations.

Unless there are confidentiality or other reasons not to do so, persons to whom the Disclosure relates will be informed of the allegation/s at an appropriate time and will be given a chance to respond to the allegations made against them. Where appropriate, they will be informed of the findings of the investigation.

Where a Discloser's concerns are found to be bona fide and where there is enough information, the matter will be reported to the Chief People Officer (subject to applicable confidentiality requirements).

Reporting to the Board

The Board will receive a summary of Disclosures made under this Policy on a regular basis, including appropriate metrics on Disclosures made.

Illegality

Where there is evidence of criminal or illegal conduct, Wilson may be required to report the matter to the appropriate authority.

Protections for Disclosers

Discloser Protection

Wilson will support Disclosers who make Disclosures under this Policy. Disclosers must not suffer detrimental treatment because of making Disclosures where they have reasonable grounds to suspect Improper Conduct. The protections available to Disclosers are described further below.

We take the protection of Disclosers very seriously. Disciplinary action, up to and including termination of employment or engagement, may be taken against any person found to have disadvantaged or victimised a person because they want to, or have, made a report about Improper Conduct.

This protection will apply to any bona fide report by a Discloser, regardless of whether the matter has been substantiated or not. Any person making a disclosure will be expected to have reasonable



grounds to suspect that Improper Conduct has occurred, but the Discloser will not be penalised if the information turns out to be incorrect.

However, a Discloser must not make a report that they know to be false or misleading. A Discloser who has knowingly made a false report may be in breach of the Wilson Code of Conduct and/or other Wilson policies and may be subject to disciplinary action up to and including termination of their employment or engagement.

Should the Discloser be found to have been involved in Improper Conduct, they may be subject to disciplinary action up to and including termination of employment (subject to any relevant protections available to them under this Policy or the law).

Support available under this Policy

Wilson is committed to making sure that Disclosers do not suffer detriment because they speak up. The support offered by Wilson under this Policy will be determined by Wilson and depend on things such as the Improper Conduct and people involved.

Support may include the following, in Wilson's absolute discretion and subject to any legal obligations:

- monitoring and managing the behaviour of other employees;
- relocating employees (which may include the people alleged to have been involved in the Improper Conduct) to a different division, group or office;
- offering the Discloser a leave of absence or flexible workplace arrangements while a matter is investigated; and/or
- access to the Wilson Employee Assistance Program and additional support (such as counselling or other support services) as appropriate.

Wilson will look for ways to support all people who disclose Improper Conduct, but it is not able to provide non-employees with the same type and level of support that it provides to employees. Where this Policy cannot be applied to non-employees (for example, because Wilson cannot offer flexible workplace arrangements to a supplier), Wilson will offer as much support as practicable.

Protecting Disclosers from detriment

No person may victimise or cause detriment to someone (or threaten to do so) because of a suspicion that any person has, will or could make a Disclosure. For example, victimisation could include doing or threatening to do something that creates:

- discrimination, detriment or damage to a person's reputation;
- harassment, intimidation or retaliation; or
- a demotion or dismissal.

Wilson will treat any report of victimisation very seriously. Any person involved in victimising conduct may be subject to disciplinary action (including but not limited to termination of employment or engagement). In some circumstances, victimisation may also be a criminal offence punishable by imprisonment. Wilson may refer any person that has engaged in victimising conduct to law enforcement authorities for further investigation.



Wilson will at all times be able to raise and address with a Discloser matters that arise in the ordinary course of their employment or engagement with Wilson (for example, any separate performance or misconduct concerns).

Legal Protections

Disclosers may also have protections under the law. In Australia, there are protections under Part 9.4AAA of the *Corporations Act* and Part IVD of the *Taxation Administration Act* against civil, criminal or administrative liability for making a disclosure covered under those Parts, although not for any conduct revealed by the disclosure. In some cases, individuals may also have protections under other laws. These protections are in addition to the protections under this Policy.

Eligible whistleblowers who make disclosures in accordance with Part 9.4AAA of the *Corporations Act* or Part IVD of the *Taxation Administration Act* may be entitled to compensation and other remedies (including injunctions, reinstatement and exemplary damages) in the event that they suffer detriment or are threatened with any detriment because of their disclosure.

As noted above, it is also an offence under Part 9.4AAA of the *Corporations Act* or Part IVD of the *Taxation Administration Act* to cause (or threaten to cause) a person detriment for making a disclosure covered under that Part.

Personal support

For further support, employees are encouraged to make use of the Employee Assistance Program (EAP). Professional and confidential counselling services are provided as part of the EAP which are free of charge for all employees and can be accessed for work-related or personal matters, 24 hours a day, 7 days a week.

EAP can be accessed by calling 1300 135 600 or emailing intake@drakewellbeinghub.com.au.

Where to go if you have questions

If you have any questions or would like further information about this Policy, please speak to your manager or a Workplace Relations representative.

Policy Review

This Policy is maintained by the People & Safety Team and may be revised from time to time. It does not form part of an individual's contract of employment or engagement.

You are welcome to contact humanresources@wilsongroupau.com with any suggestions, feedback or questions.