

Speak Up Policy

Policy Owner	People & Safety
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Last Reviewed	May 2026
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Version	4
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Purpose

Wilson is committed to creating and maintaining high standards of corporate governance and ethical conduct across all our businesses and locations globally. Wilson expects all its employees, consultants and contractors (our People) who have been engaged to provide services to Wilson, to act with honesty and integrity in maintaining these high standards.

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 protected disclosure and what protections a discloser will receive;
- Outline the processes at Wilson for responding to protected 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 Serious Wrongdoing (defined below).

Wilson will not tolerate anyone being discouraged from speaking up about potential or actual Serious Wrongdoing or being disadvantaged or victimised because they want to make a report or have done so. This Policy explains the mechanism whereby a person can report their concerns freely and without fear of reprisal or intimidation. It also addresses the protection provided to individuals making a report, deals with confidentiality and provides an overview of Wilson's process for responding to reports.

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, compliance and ethical behaviour and in which everyone feels safe, supported and encouraged to report Serious Wrongdoing.

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

Policy

Any person who makes a report about Serious Wrongdoing to Wilson must not be subject to victimisation, reprisal or retribution because of their actions. Complying with this Policy is a requirement of ongoing employment or engagement with Wilson. 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 Serious Wrongdoing.

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 Protected Disclosure will be expected to have reasonable grounds to suspect the information being disclosed is true, 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.



For the purposes of this Policy, a bona fide disclosure means a disclosure made with an honest belief, on reasonable grounds, that the information is true or likely to be true.

For the avoidance of any doubt, any person that engages in Serious Wrongdoing including, but not limited to fraud, corruption or conduct which amounts to a serious breach of applicable laws, while performing their duties may be subject to disciplinary action, up to and including termination of employment or termination of engagement.

Any person or organisation who has any concern about any Serious Wrongdoing or non-compliance with Wilson policies, procedures or applicable laws by any of our People is invited to make a Protected Disclosure in accordance with this Policy or lodge a complaint in accordance with the Complaint Policy, as applicable.

Any person or organisation who has any concern about any Serious Wrongdoing or non-compliance with Wilson policies, procedures or New Zealand laws, by our employees is invited to make a Protected Disclosure in accordance with this Policy or lodge a complaint in accordance with the Complaint Policy, as applicable.

This Policy applies in New Zealand and is issued in accordance with the Protected Disclosures (Protection of Whistleblowers) Act 2022 (NZ) (the Act).

Definitions

Protected Disclosure	A disclosure of information is a Protected Disclosure if the Discloser: • believes on reasonable grounds that there is, or has been, serious wrongdoing in or by Wilson; and • discloses information about that in accordance with this Policy and the Protected Disclosures Act 2022; and • does not make the Protected Disclosure in bad faith; and • the Disclosure believes on reasonable grounds that the information is true or likely to be true.
Serious Wrongdoing	Includes any act, omission, or course of conduct by any organisation that constitutes: • An offence; • A serious risk to public health, public safety, the health or safety of any individual, or the environment; • A serious risk to the maintenance of law, including the prevention, investigation, and detection of offences or the right to a fair trial; and • An unlawful, corrupt, or irregular use of public funds or public resources.
Discloser	Refers to the person reporting Serious Wrongdoing under the terms of this Policy and the Act.



Scope

Who is covered by this Policy?

This Policy applies to all employees (both former and current) across New Zealand, and to the extent relevant all consultants and contractors who have been engaged to provide services to Wilson and its related companies.

Wilson encourages everyone to speak up about Serious Wrongdoing. People must not discourage any individual from making a Protected Disclosure and to do so may in itself be a breach of this Policy. If any person is told not to raise a concern, even by their Manager or a person in authority, they are encouraged to make a further Protected Disclosure to a different Disclosure Officer.

When does this Policy apply?

The application of this Policy is not limited to the workplace or standard working hours. Wilson's expectations for how its 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.

All Individuals: are responsible for familiarising themselves and complying with this Policy. This responsibility extends to contractors and consultants.

All Managers/Supervisors: may from time to time receive information that appears to be a Disclosure under this Policy. They must notify a Disclosure Officer if they receive information that appears to be a Protected Disclosure, be aware of and comply with their obligations under this Policy.

Disclosure Officers (DO): are designated with responsibility for receiving confidential reports in relation to Serious Wrongdoing.

Investigating Officer (IO): are to investigate the substance of the Protected Disclosures referred to them by Disclosure Officers, to determine whether there is evidence in support of the matters raised which may need to be taken further.

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.

Human Resources or Employee Relations representatives: may from time to time receive information that appears to be a Protected Disclosure under this Policy. They must notify a Disclosure Officer if they receive information that appears to be a Protected Disclosure and be aware of and comply with their obligations under this Policy.



Making a Report

Reporting actual or suspected Serious Wrongdoing

A disclosure will be protected when:

- It relates to information about Serious Wrongdoing in or by Wilson; and
- The Discloser believes on reasonable grounds that the information is true;
- It is made so that the Serious Wrongdoing can be investigated;
- It is made in accordance with this Policy;
- The Discloser is acting in good faith, and
- The Discloser wishes the disclosure to be protected.

A Protected Disclosure may be made to:

- The external, independent reporting service (“the Wilson Group Speak Up Service”) –
 - via the internet (www.wilsongroupspakeup.deloitte.com.au); or
 - By emailing wilsongroupspakeup@deloitte.com.au
- The head or deputy head of the business unit;
- An appropriate authority; 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	lara.donnini@wilsongroupau.com
Paul Brazier General Manager, Risk and Compliance	paul.brazier@wilsonsecurity.com.au
Georgia Simmonds Group Workplace Relations Counsel	georgia.simmonds@wilsongroupau.com
Jo Bigham Employment Relations Counsel	jo.bigham@wilsongroupau.com



Reporting non-compliance outside Wilson (to an appropriate authority)

It is Wilson's aim to ensure that people do not feel the need to discuss Wilson company concerns outside of Wilson. However, nothing in this Policy should be interpreted as restricting an individual from raising issues or providing information to an appropriate authority, such as the Serious Fraud Office, Ministry of Business, Innovation and Employment (MBIE), or WorkSafe 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.

Nothing in this Policy, restricts an individual from making a protected disclosure directly to an appropriate authority at any time, in accordance with the Act.

Confidentiality

Any person to whom a Protected Disclosure is made or referred must use their best endeavours not to disclose information that might identify the Discloser, unless:

- The Discloser consents in writing to the Protected Disclosure of that information; or
- The person who receives the Protected Disclosure reasonably believes that disclosure of identifying information is essential:
 - a) To the effective investigation of the allegations in the Protected Disclosure; or
 - b) To prevent serious risk to public health, public safety, or harm to the environment; or
 - c) Having regard to the principles of natural justice; or
 - d) To an investigation by a law enforcement or regulatory agency for the purpose of law enforcement.
- If it is necessary to release identifying information for the reasons described above:
 - The Discloser will be consulted if the reason is that described at (a) or (c);
 - The Discloser will be consulted if it is practicable to do so if the reason is that described at (b) or (d).

What information is required?

For a report of suspected Serious Wrongdoing to be investigated, it must contain sufficient information for Wilson to form a reasonable basis for considering the report to be genuine and to form a reasonable basis for taking further steps to investigate. It can be oral or in writing and the Discloser should, where possible, provide:

- Their name (unless reported anonymously);
- Nature of the issue or complaint;
- All relevant facts giving rise to the complaint;
- Name of the relevant Wilson division;
- Where the complaint has arisen; and
- Names of the Wilson employee(s)/contractor(s) /consultant(s) involved.



Disclosers will also be asked to declare:

- That they have provided true, accurate information of the events that have occurred and that led to the complaint; and
- That the discloser consents to the disclosure of their name and the information contained in their protected disclosure as required for the purpose of any investigation or reporting.

Making an anonymous Protected Disclosure

Protected Disclosures can be made anonymously if the person making the Protected Disclosure does not want to reveal their identity. It is recognised that sometimes anonymous reports limit the extent of information available for consideration and investigation, limit Wilson's ability to seek further information from the Discloser and investigate the matter effectively.

The Disclosure Officer (or other person receiving the Protected Disclosure) will seek the Discloser's consent before recording the Discloser's name. Disclosers should feel supported and safe in providing information, and 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 Protected Disclosure. However, they are not required to do so, and if the Discloser elects to remain anonymous, Wilson will investigate the Protected Disclosure as best as possible in the circumstances. However, an investigation may not be possible unless sufficient information is provided.

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

How Wilson will respond

Initial response

Once a purported Protected Disclosure is received, a receiver of a Protected Disclosure will consider whether the information provided is a Protected Disclosure under this Policy and applicable legislation and determine whether the matter warrants further investigation. The recipient should engage the Employment Relations Counsel to assist with this process.

As all situations are different, where an investigation takes place, it will be conducted in a manner appropriate to the circumstances.

Investigation process

Protected Disclosures made under this Policy will be treated sensitively and seriously and will be investigated fairly, objectively and in accordance with the principles of natural justice.

A receiver of a Protected Disclosure has 20 working days to:

- Acknowledge to the Discloser when the Protected Disclosure was received;
- Consider the Protected Disclosure and whether it warrants investigation;



- Check with the Discloser whether the Protected Disclosure has been made elsewhere and if there was any outcome, and
- Deal with the matter by:
 - Investigating the Protected Disclosure;
 - Addressing any Serious Wrongdoing by acting or recommending action;
 - Referring it to an appropriate authority; or
 - Deciding that no action is required.

The receiver of the Protected Disclosure must inform the Discloser within 20 days what is being done (with reasons), including if a receiver decides that no action is required.

The Discloser must at all times keep the information disclosed and all matters arising confidential between themselves and the person to whom they have disclosed the information.

Disclosers will be told how Wilson has decided to respond to their Protected Disclosure, including whether an investigation will be conducted. The Discloser may not discuss this with any other person.

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.

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.

Disclosers involved in Serious Wrongdoing

Should the Discloser be found to have been involved in Serious Wrongdoing, 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).

False Reporting

A disclosure will not be protected under this Policy or under the Act if the discloser knowingly makes a false disclosure or does not have reasonable grounds for believing the information is true. Where this is established, the matter will be treated seriously, and the Discloser may be subject to disciplinary action up to and including termination of employment.

Illegality

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



Protections

Wilson is committed to making sure that Disclosers do not suffer detriment because they speak up. Disclosers will be afforded protections as set out in the Act.

No unfavourable treatment

Disclosers will not:

- Suffer any form of retaliation. Retaliation may include:
 - Dismissing the Employee;
 - Refusing or omitting to afford an Employee the same terms or conditions of employment;
 - Subjecting the Employee to any disadvantage or detriment; or
 - Retiring the Employee or causing them to resign/retire.
- Suffer any form of victimisation or unfavourable treatment after either making a Protected Disclosure, encouraging someone else to make a Protected Disclosure, or providing information in support of a Protected Disclosure (unless the Employee has knowingly made a false allegation in bad faith).

Victimisation could include but is not limited to, doing or threatening to do something that creates discrimination, detriment or damage to a person's reputation; harassment, intimidation or retaliation; or 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 termination of engagement). In some circumstances, this may also be a criminal offence that could be punishable by imprisonment.

- Be subject to any civil, criminal or disciplinary proceedings as a result of making a Protected Disclosure.

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 the people involved. At Wilson's absolute discretion and subject to any legal obligations support may include the following:

- Monitoring and managing the behaviour of other employees, contractors or consultants;
- Relocating employees, contractors or consultant (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
- A discloser may access the Wilson employee assistance program and can also request additional support from Wilson (such as counselling or other support services).

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 reasonably practicable.

Additional Information

Where To Go If You Have Questions

If you have any questions about this Policy, please speak to your manager or an Employee 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.

Please contact humanresources@wilsongroupau.com with any suggestions, feedback or questions.