



WHISTLEBLOWER POLICY

ACSI WHISTLEBLOWER POLICY

At ACSI we recognise the importance of whistleblower protection and are committed to the respectful and fair treatment of whistleblowers. This includes commitment to address whistleblower concerns and reporting of whistleblower concerns to Management and Governance bodies, enabling ACSI to comply with our obligations.

1. PURPOSE OF THE POLICY

The ACSI Whistleblower policy exists to support ACSI staff, and individuals eligible under this policy, to behave in a manner reflective of ACSI's values and our Code of Conduct expectations. It is recommended that this policy be read in conjunction with ACSI's Code of Conduct.

ACSI prohibits any form of punishment, disciplinary or retaliatory action against anyone for asking a question, raising a concern, or making a report (also known as a disclosure) about a possible breach, including that of our Code of Conduct. If you experience retaliation, you should report it immediately. Retaliation is grounds for disciplinary action against the perpetrator, including dismissal.

ACSI actively encourages you to raise questions or concerns promptly and never ignore a breach of our Code of Conduct or the law. This policy will help you understand how and where to go for further assistance, what will happen and how you are protected. It is important that you apply good judgement and consider the facts when raising a concern or making a report, rather than raising a personal grievance you may have with an individual or group of individuals.

2. WHO THE POLICY APPLIES TO

This policy applies to all current and former ACSI employees and Board Directors.

Whistleblower protection is also extended to a spouse/partner, relative or dependent of ACSI employees and Board Directors.

ACSI members, and their representatives, and ACSI suppliers are also encouraged to speak up if they observe or are aware of any potential or actual wrongdoing.

If you are unsure about an aspect of this policy, you can ask a manager or the CFO/COO or CEO for clarification. If you have concerns about its application or think that there has been

a matter for disclosure, you have the responsibility and right to report this. The issue does not have to directly involve you for you to raise it.

3. MATTERS THE POLICY APPLIES TO

Disclosable matters under this policy include breaches of our Code of Conduct (misconduct) and breaches of the law including fraud. Fraud is any intentional act of deception of law which is undertaken for personal or third-party gain which may result in loss to us or a third party. Examples include misuse of our intellectual property, falsification of records, misappropriation of funds, theft, or failure to comply with the law or regulatory requirements. Such actions could be grounds for dismissal and possibly criminal charges.

Engaging in the following types of conduct is covered by this policy:

- Breaches the Corporations Act
- Breaches other financial sector laws enforced by ASIC or APRA
- Breaches an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months, or
- Represents a danger to the public or the financial system.

Disclosures that are not about 'disclosable matters' do not qualify for protection under the Corporations Act. This includes personnel related grievances. Please refer to the ACSI grievance policy to report a matter of work-related grievance or complaint which does not apply under the whistleblower policy.

Deliberate false reporting is discouraged. We entrust you to report any conduct or suspected breaches in accordance with this policy, being aware of the actions and implications of others around you.

4. WHO CAN RECEIVE A DISCLOSURE AND HOW TO MAKE A DISCLOSURE

In the first instance, you should speak to an ACSI manager about the issue or query. If this is not possible, or you are not satisfied with the response you receive, you should raise the issue with the CFO/COO or the CEO.

If the issue relates to ACSI management or you believe that appropriate action has not been taken, you can raise the issue with the Chair of the Finance, Risk and Audit Committee of the Board (who is independent from management and can be reached at ACSIconduct@acsi.org.au).

You can anonymously raise an issue via email to: ACSIconduct@acsi.org.au. Disclosures made anonymously can still be protected under the Corporations Act.

Should you feel that you cannot make your disclosure to one of the above people, you can also make your disclosure to a member of ACSI's audit team, ASIC or APRA, any prescribed Commonwealth authority or other relevant regulator or agency or your lawyer.

Irrespective of how you raise a conduct concern, it is essential that you provide as much information as possible and are open and honest. While you can choose to raise an issue anonymously, it is preferable to provide your name and contact details in case further assessment or investigation is needed.

You must have reasonable grounds to suspect that the information you are disclosing is a matter of misconduct or an improper state of affairs or circumstances. Reasonable grounds are defined as what a reasonable person in your position would also suspect the information indicates misconduct or a breach of the law.

5. LEGAL PROTECTIONS FOR DISCLOSERS

The Corporations Act protects you if you make a whistleblower report (disclosure) internally within ACSI or externally to those who can receive a disclosure as noted in section 4 above.

The protections can also apply to you if you make a whistleblower report to a journalist or a member of the Commonwealth Parliament or a state or territory parliament (parliamentarian). However, this is only in certain limited circumstances in matters of public interest or emergency disclosures. Criteria for these circumstances are outlined on the [ASIC website](#).

If you disclose your concerns to the public in another way, these protections do not apply.

There are several protections available to disclosers who qualify for protection as a whistleblower, including protections under the Corporations Act. These protections are:

- identity protection (confidentiality);
- protection from detrimental acts or omissions;
- compensation and remedies; and
- civil, criminal, and administrative liability protection.

The [ASIC website](#) provides further detail as to how the Corporations Act protections above apply to you should you disclose a matter under this policy.

6. SUPPORT AND PRACTICAL PROTECTION FOR DISCLOSERS

It can be stressful to raise conduct concerns and ACSI is committed to supporting those who do. You will be offered support by ACSI Management should you provide disclosure to them and you can also access our Employee Assistance Program (EAP) in confidence by calling 03 8317 0444.

ACSI will consider remediation for genuine whistleblowers who, despite this policy, suffer reprisals or other detrimental impacts.

7. HANDLING AND INVESTIGATING A DISCLOSURE

After a disclosure is raised, it will be investigated appropriately and sensitively, and the action taken will depend on the severity and nature of the issue. Initially, you will be asked who you reported the issue to, the nature of the issue, who is involved and what actions you have already taken to resolve the issue. Confidentiality and anonymity will be respected.

The guidance you receive may allow you to resolve the issue yourself. If not, and other action or an investigation is required, you will be kept informed about the next steps, anticipated timeframes, and the feedback process.

The following procedural templates are available as part of ACSI's internal policy suite or by contacting the ACSI CFO/COO or CEO should you wish to raise a disclosure item or further understand what is involved in making or investigating a disclosure:

- [ACSI investigation checklist](#)
- [ACSI investigation plan template](#)
- [Making a whistleblower report](#)

8. ENSURING FAIR TREATMENT OF INDIVIDUALS MENTIONED IN A DISCLOSURE

Fair treatment of all staff and individuals mentioned in a reported disclosure will be considered to ensure that the appropriate protections to all parties apply and disclosures made remain confidential and anonymous where requested. Access to disclosures made will be kept to a minimum and reflect the avenue chosen (i.e. the receiver of the disclosure). All information as part of the disclosure will be kept in accordance with our Privacy policy.

Reporting of any compliance and breaches as part of quarterly FRAC and Board reporting will ensure appropriate levels of confidentiality and anonymity.

9. ENSURING THE POLICY IS EASILY ACCESSABLE

The ACSI whistleblower policy is available to all staff as part of our internal policy suite. It is recommended that this policy is read in conjunction with the ACSI Code of Conduct. Any Code of Conduct education and/or training will also encapsulate the current whistleblower policy.

The policy is also publicly available for access on the [ACSI website](#) or alternatively by contacting the CFO/COO or CEO. Should you have any queries in relation to this policy or how it works, please contact the CFO/COO or the CEO.

10. CHANGES TO THE WHISTLEBLOWER POLICY

This policy will be reviewed by the ACSI Board every two years or more frequently should any regulatory changes or changes in ACSI's Code of Conduct occur require updates to this policy.

Revision Number	Date of Issue	Author(s)	Brief Description of Change
0.1	20 April 2023	Karen Griffiths	Reviewed and updated for ASIC report 758: Good practices for handling whistleblower disclosures March 2023.
0.2	11 March 2025	Catriona Devenney	Reviewed – minor amendments required – approved by the Board March 2025