

# Whistleblower Policy

Version date: February 2020

Review date: February 2023

Policy owner: Director Corporate Services

## Purpose

The purpose of this policy is to provide assurance that:

- People suspecting wrongdoing are encouraged to report it
- There is appropriate protection for those who make such reports
- Matters reported are investigated and managed appropriately

## Scope

For this policy to apply, the disclosure must be made by someone (“the whistleblower”) who:

- Is a current or former director/officer of the company, employee, supplier, contractor (paid or unpaid), relative or dependent of any of the listed individuals or of their spouse
- Makes the disclosure in relation to Unison or one of its subsidiaries
- Makes the disclosure to the company’s auditor, a director, the company secretary, a member of the senior management team, any other person authorised by Unison to receive disclosures of that kind, ASIC, APRA or a Commonwealth authority prescribed for these purposes
- Has reasonable grounds to suspect that the information they are disclosing indicates that the company may have breached the Corporations Act 2001, (the Act) the ASIC Act 2001, or another law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more, or that the conduct represents a danger to the public or the financial system
- Makes the disclosure in good faith.

Unison encourages anyone not fitting the above criteria who has information about any suspected or actual illegal, improper, dangerous or unethical conduct to raise their concerns with management.

## Principles

Unison is committed to operating in, promoting and supporting a culture of honest and ethical behaviour, compliance and high levels of probity for itself and subsidiaries.

Unison recognises the importance of providing a safe environment free of reprisals to encourage and support disclosures of suspected or actual illegal, improper or unethical conduct, so that any issues can be identified and managed appropriately.

## Application

### Disclosures

For the whistleblower protections under the Act to apply, disclosures must be made as outlined in the principles above. Unison encourages people with concerns to approach a member of the Executive team or the Company Secretary or the Manager Risk and Compliance. Unison encourages the disclosures to be made in writing. Any verbal disclosure will need to be documented.

### Confidentiality

The whistleblower can request to remain anonymous, to restrict who knows their identity, and/or who is informed of their disclosure.

Unison or its subsidiary will comply with these requests to the extent that it can do so and is legally permitted. Confidential information may be disclosed, where reasonably necessary, to investigate a disclosed matter, and the person who discloses the confidential information will take all reasonable steps to reduce the risk that the discloser will be identified.

### Investigation

There may be practical limitations to investigate the disclosure if the whistleblower does not consent to share their disclosure.

Where consent to share the disclosure has been received, the person to whom the disclosure was made will refer the matter to the person managing the investigation, which is the Company Secretary, or if the disclosure relates to that person, the Chair of the Finance, Audit and Risk Committee (FARCOM). The investigator may conduct a preliminary review to determine whether a full investigation is warranted.

The investigation may be undertaken by an internal or external investigator, nominated by the person managing the investigation. The investigation will seek evidence to either substantiate or refute the allegations made by the discloser and make recommendations to address any wrongdoing identified. It will be carried out in accordance with the principles of fairness and natural justice.

### Findings

Any findings that relate to possible criminal activity may be reported to Police and/or the regulator.

Subject to confidentiality restrictions, the investigation report will be shared with the CEO and FARCOM, who will consider the recommendations and determine appropriate action to address the issues.

### Protection

A whistleblower who reports matters in good faith, and provided they are not involved in the misconduct reported, will not be penalised or personally disadvantaged because of that report. This includes protection from discrimination, harassment or bullying.

Unison and its subsidiary will also ensure fair treatment of any employee or director mentioned in the whistleblower disclosure.



Disclosures are viewed seriously and, where found to be false or malicious, could expose the whistleblower to disciplinary action up to and including dismissal.

## Communication of the Whistleblower Policy

The Unison whistleblower policy will be communicated to staff through a variety of methods to ensure awareness of the process and their rights. This includes:

- Policy available on the Unison intranet (SharePoint)
- Policy accessible on Unison Website for external stakeholders
- Topic covered in induction - refer to [1<sup>st</sup> Week Induction Checklist](#)

## Review of policy

This policy will be reviewed every three years as delegated by the responsible Executive.