

Corporate Whistle-blower Policy

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1. Introduction

Campbell Page's written policies and guidelines require all employees - regardless of what role they have in the organisation - to "Do What's Right" when interacting with our customers, stakeholders, service providers and with each other. Campbell Page is committed to ensuring the organisation and all its employees act in compliance with all laws and with the ethical standards set out in the Code of Conduct.

1.1 Purpose

Campbell Page recognises that any genuine commitment to detecting and preventing illegal and other undesirable conduct must include a mechanism whereby employees and others can report their valid concerns freely, in confidence and without fear of repercussion. The Whistle-blower Program and this Policy provides such a mechanism and encourages the reporting of such conduct.

This Policy aims to provide the following outcomes:

- compliance with laws;
- a healthier and safer work environment;
- more effective management of fraud, misconduct and undesirable behaviour;
- improved morale; and
- a clear understanding by employees of their role and responsibilities.

1.2 Scope

This Policy applies to all Campbell Page employees and extends to our customers, previous employees, members of the public, and other external stakeholders.

1.3 Glossary of Terms

Internal Audit: An independent review and/or validation of the effectiveness of mitigation strategies put in place to prevent and/or detect risks.

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.

Whistle-blower: A whistle-blower 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.

2. Reportable Matters

Whistle-blowers are encouraged to report any conduct that they believe contravenes our corporate policies, government agreements, Code of Conduct or standards of behaviour. This may include, but is not limited to, behaviour or conduct that is:

- Fraudulent or corrupt
- Dishonest
- Unlawful (including theft, drug sale or use, violence, bullying, harassment etc.).
- Unethical
- Misleading or deceptive

Whistle-blowers are obliged to act in good faith and have reasonable grounds for believing the conduct is a reportable matter.

Refer to the Fraud & Corruption Control Policy and the Code of Conduct for further information, including examples of what constitutes reportable conduct.

3. Reporting Procedures

Whistle-blowers can report matters via email or phone to the following internal staff members:

- Their direct line manager;
- General Manager Risk;
- Head of People & Culture or their delegate;
- The Chief Executive Officer or other members of the Leadership Team.

However, if the whistle-blower doesn't feel comfortable in reporting the matter internally, they may choose to report the matter anonymously via the external whistle-blower hotline facility managed by STOPLine; an Australian based, confidential, independent provider of disclosure services. Matters can be reported via 5 different channels at a time convenient for the whistle-blower:

1. Telephone
2. Mail
3. Email
4. Fax
5. Online

STOPLine is available to all Campbell Page employees, contractors and other stakeholders. Translation services are also available if requested.

The link to the STOPLine website can be found on both the intranet and Campbell Page's external website.

4. Investigations

For an allegation to be effectively investigated, it must contain sufficient information to form a reasonable basis for investigation.

When a whistle-blower reports a matter either internally or via the external whistle-blower hotline facility, it will be subject to a thorough investigation by the General Manager Risk in line with the approach and methodology outlined in the Campbell Page Internal Audit Policy, with the objective of locating evidence that either substantiates or refutes the allegation.

All information received by Campbell Page via a whistle-blower will be collected, considered and handled in a way that has regard to the law, privacy, confidentiality, fairness and legal privilege.

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.

The whistle-blower will be informed of the outcome of the investigation if they so wish.

Any whistle-blower related investigation will be reported to the Chief Executive Officer in the first instance. The Head of People and Culture will also be informed accordingly. A summary of the nature of the allegation and the results of an investigation will be reported to the Audit & Risk Committee in a timely manner.

No staff member, including directors of Campbell Page can be involved in receiving whistle-blower related communication or the conduct of investigations involving themselves.

Campbell Page, when undertaking any related investigation, may engage external professionals to assist in any part of the investigation process.

4.1 Anonymity of the Whistle-blower via STOPLine

Whistle-blowers who are concerned about their anonymity are encouraged to only report matters via STOPLine. Due to the independent nature of the STOPLine disclosure service, there is a greater level of control, and therefore assurance afforded to maintaining the whistle-blowers anonymity; compared to reporting matters internally.

If additional information is required from the Whistle-blower in order to investigate a reportable matter more fully, this will also be managed by STOPLine to ensure anonymity is maintained.

Any commitment of confidentiality is subject to the requirements of the law, which may require disclosure of the identity of the whistle-blower in legal proceedings. Information obtained from a whistle-blower will only be disclosed to the extent necessary to conduct an investigation into the matter, or if the whistle-blower consents to the disclosure, or as may be required by law.

Unauthorised disclosure of information other than in accordance with this Policy by Campbell Page staff may be the subject of disciplinary proceedings, including summary dismissal.

4.2 Protection of the Whistle-blower

Whistle-blowers who report matters will not be penalised or personally disadvantaged because they have reported a matter. A whistle-blower who believes he or she, or his or her family, has been subject to disadvantage or discrimination by reason of their status as a whistle-blower, should immediately report the same to the Chief Executive Officer.

Any employee or director who is found to have dismissed, demoted, harassed or discriminated against a whistle-blower by reason of their status as a whistle-blower, may be subjected to disciplinary measures, including summary dismissal.

Whistle-blowers 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.

Employees who report false and/or vexatious allegations will also face disciplinary measures, including summary dismissal. The Whistle-blower Program and this Policy aims to encourage reporting of genuine misconduct, and is not to be used to resolve personal grievances or conflict.

4.3 Support

All employees involved in a reportable matter are encouraged to access the Employee Assistance Program (EAP) for support when needed. Information and contact details regarding the EAP are located on the Campbell Page intranet.

5. Public and Media Communications

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 a reportable matter.