

Whistleblower and Reporting of Improper Conduct Policy

Introduction

Asaleo Care Ltd (Asaleo Care) is committed to conducting its business in a professional, lawful and ethical manner and in accordance with its values.

It is the duty and responsibility of all employees, contractors and agents to conduct themselves in accordance with the highest ethical standards and in accordance with all relevant laws and Company policies and procedures.

If any person has a concern about any improper conduct or non-compliance by any Asaleo Care employee, agent or contractor they should report it to their manager or follow the procedures in the relevant Company Policy. If they feel unable to do this, or it is inappropriate in the circumstances, it should be reported in accordance with this Policy.

Purpose of this Policy

The purpose of this Policy is to:

- encourage the reporting of improper conduct (including fraudulent and corrupt conduct) by employees, suppliers, customers, contractors and other third parties
- assist in obtaining information on improper conduct so that such conduct can be addressed
- provide contact details which can be used for reporting improper conduct; and
- protect people who report improper conduct in good faith.

Interpretation

Improper conduct includes conduct which is:

- fraudulent, corrupt or unlawful,
- amounts to discrimination, harassment, bullying, occupational violence, vilification or victimisation,
- a substantial risk to public health and safety or the health and safety of Asaleo Care employees or contractors,
- a substantial risk to the environment, or
- conduct that is otherwise in breach of Asaleo Care's Code of Conduct or other Asaleo Care policy or procedure.

It does not include:

- Grievances or dissatisfaction with decisions made by management in accordance with appropriate procedures. Such matters should be pursued through standard reporting lines and Company procedures
- Miscellaneous complaints in relation to Asaleo Care products and/or services (such as product complaints). Such matters should be dealt with pursuant to complaints handling procedures which can be assessed on the Company website (www.asaleocare.com).

“Whistleblower line” details

Any report pursuant to this Policy should be addressed to:

Company Secretary
Asaleo Care Ltd
Ailsa Street
Box Hill, Victoria 3128

Email: james.orr@asaleocare.com
Phone: (03) 9258 0824

OR

Chair of Audit and Risk Committee
Email: auditcommitteechair@asaleocare.com

Reporting Incidents

Employees, agents, contractors or other 3rd parties are encouraged to report suspected improper conduct.

All reports of improper conduct will be investigated promptly to test the validity of the allegations. Whilst maintaining confidentiality, reputations will also be protected from unfounded allegations. Based on the findings of the investigation, appropriate follow up action will be taken.

In making a report a complainant should provide the following information:

- their name and contact details (if they are prepared to give this information)
- nature of the Complaint and all relevant facts giving rise to the complaint including reasonable grounds for their concern.
- the name(s) of those involved and the relevant Asaleo Care department or business, and
- whether the complainant consents to the disclosure of their name (if provided).

Complaint Handling and Investigation

The Company Secretary or Chair of Audit and Risk Committee will assess the information provided to determine how the complaint is most appropriately investigated. They will communicate with relevant senior management, and Directors as required, appoint a Complaints Officer and determine a time frame for the investigation and preparation of the report. The Company Secretary or Chair of Audit and Risk Committee will communicate with the complainant to keep them updated of progress and advise them of the outcome of the investigation.

Relevant details will be provided to the Complaints Officer who will investigate the complaint and prepare a report. External experts may be appointed to assist with an investigation.

Given the potentially significant legal implications, an interviewer, with knowledge of legal requirements, will generally undertake all such interviews, following consultation with and under the supervision of the General Counsel. Where appropriate an external interviewer may be engaged. Under no circumstances will interviews be carried out on a one-on-one basis.

On completion of the investigation a report of the incident will be produced. The circulation of the report should be strictly controlled on a ‘need to know basis’.

The report should identify:

- how the improper conduct was revealed
- if the complaint has been verified and if so, the nature of the improper conduct

- the timeframe in which the improper conduct was committed
- the loss involved (if known)
- how the improper conduct was committed
- who committed the improper conduct
- the actions taken or being taken to stop the improper conduct re-occurring
- the action taken or anticipated to recover the losses incurred; and
- recommended follow up actions.

The report should also include all relevant evidence and documentation relevant to the complaint and investigation.

If improper conduct is discovered, verified or suspected as a result of the investigation, appropriate senior management, and/or directors will be notified, whilst at all times providing appropriate protection to the complainant.

Complainant Protection

If a complainant does not wish to reveal their identity when providing information about improper conduct, their identity will be protected and will not be disclosed without their consent, unless required by law or unless it is absolutely necessary in order to investigate serious allegations. In such instances all efforts will be made to limit disclosure to the maximum extent possible and protect the complainant's identity. A complainant may also choose to remain entirely anonymous, not even disclosing their identity to the Company Secretary or Chair of Audit and Risk Committee. This may however impact on the ability to investigate the report.

It is crucial that an employee, or any other party, who makes a report is protected. Asaleo Care will seek to ensure that any person can raise their concerns without fear of victimisation and in the knowledge that their concerns will be addressed. Asaleo Care will take all reasonable measures to protect individuals against any detrimental actions which may arise as a consequence of providing / disclosing information relating to suspected improper conduct. This includes ensuring that an employee's position in the Company and their ongoing employment and advancement is not in any way prejudiced. However, false reporting through these channels or abuse of the process will be regarded as a serious matter and may result in disciplinary action.

If the complainant believes that this Policy has not been followed or is of the view that the resolution of the complaint has not been satisfactory, the complainant may contact the Chair of the Audit & Risk Committee in writing seeking a review.

Disciplinary proceedings

As a general rule, any employee, agent or contractor engaging in fraud or corruption in the course of his/her duties will be dismissed. Any employee, agent or contractor engaging in other improper conduct may also be subject to disciplinary conduct which may include dismissal.

Where there is sufficient evidence of criminal conduct, the business will, following clearance by the Chief Executive Officer, support the prosecution of the relevant person, either in the criminal or the civil courts, in accordance with local legislation.

Procedures in relevant Company policies will be applied as appropriate.

Education and Training of Employees

Information on this Policy will be provided to employees when they commence employment and as part of ongoing compliance training. It will also be provided to contractors as part of their induction.

Availability of Policy

This Policy will be available on the Company's intranet and internet sites. A summary of the Policy, including contact details, will be placed on notice Boards in those Company facilities where employees and contractors do not generally have internet access.

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