Whistleblower Protection Policy

Overview

The Whistleblower Protection Policy (the Policy) is one of a number of Policies and Codes that promotes a culture of compliance, honesty and ethical behaviour within the SECURE*corp* Group.

In line with SECURE*corp's* mission of ***Reliability, Integrity and Results***, SECURE*corp's* aim is to encourage staff to report any wrongdoing in good faith and in an environment free from victimisation so that the Board and Senior Management can adequately manage risk and culture issues within SECURE*corp*.

Commitment

SECURE*corp's* Senior Management encourages all staff to report wrongdoing. SECURE*corp's* attitude is *"when in doubt report"*. All staff should feel confident and comfortable about reporting wrongdoing.

SECURE*corp's* Senior Management is committed to protecting and supporting the dignity, well-being, career and good name of anyone reporting wrongdoing.

Scope

The Policy applies to all staff, including SECURE*corp* Directors, Managers, Supervisors, staff, contractors and consultants in all businesses and subsidiaries and at all locations within the Group.

It sets out the minimum requirements for the SECURE*corp* Group. Where SECURE*corp* operates in another jurisdiction (eg: overseas, different States) and that jurisdiction imposes a higher standard, those local standards are deemed to be incorporated into and to supplement the Policy.

What is "wrongdoing"?

Examples of wrongdoing include, but are not limited to, the following:

- a breach of regulations or laws;
- a breach of SECURE*corp's* Policies and Codes;
- dishonest or corrupt behaviour, including soliciting, accepting or offering a bribe, facilitation payments or other such benefits;
- fraudulent activity;
- illegal activity (including theft, drug sale / use, violence or threatened violence and property damage);
- impeding internal or external audit process;
- improper behaviour relating to accounting, internal accounting, controls, actuarial, or audit matters;
- a serious impropriety;
- conduct endangering health or safety;
- a substantial mismanagement of SECURE*corp's* resources;
- conduct that is detrimental to SECURE*corp's* financial position or reputation; and concealment of wrongdoing.

Reporting wrongdoing

A staff member can report wrongdoing in two ways:

1. Direct Line of Management
2. Executive Access

1. Direct Line of Management

Depending on the nature of the wrongdoing, the staff member is encouraged to first discuss their concern with their Manager.

Any staff member that submits or receives a report must treat the matter confidentially.

If the staff member does not feel comfortable speaking with their Manager, they can raise a wrongdoing with the support area within SECURE*corp* relevant to their concern:

Type of Concern	**Support Area**
Fraud or Financial Crime	CEO or COO
Staff or people matters	National Manager of HR & Support Services
Compliance	General Manager of Business Unit / Division
Health and Safety issues	COO

Reports of wrongdoing raised through these channels may be commenced via SECURE*corp* Group's "Allegations of Employee Misconduct" procedure, and investigated using the SECURE*corp* Group's "Complaints Policy and Procedure" or "Discrimination, Harassment & Bullying Policy and Procedure" if applicable.

Staff reporting wrongdoing via these channels can be assured they will be protected and that the investigation will be conducted in accordance with SECURE*corp's* values of ***Reliability, Integrity and Results,*** as well as under the principles of fairness and natural justice.

The Policy does not prevent a staff member from reporting wrongdoing to a regulator under an applicable law or prudential standard.

2. Executive Access

The SECURE*corp* Group also recognises that staff may prefer to bypass their Direct Line of Management in certain circumstances, including but not limited to the following:

- they believe that may be a victimised if they use a normal reporting channel; or
- they prefer to make the report anonymously.

To ensure these staff can raise a wrongdoing, SECURE*corp* fosters direct access to Executive Management via *Executive Access*. *Executive Access* operates via the designated email address feedback@SECURE*corp*.com.au which is monitored directly by Executive Management where wrongdoing can be reported on an individual or anonymous basis.

Investigating wrongdoing

Investigations of wrongdoing will be conducted in a manner that is confidential, fair and objective. The investigations process will vary depending on the nature of the wrongdoing and the amount of information provided.

For a report to be investigated, it must contain sufficient information to form a reasonable basis for investigation. A staff member reporting anonymously, via Executive Access, should provide as much information as possible so as not to compromise the ability to fully investigate the report.

A Whistleblower will always be informed of the outcome of the investigation. In cases where the Whistleblower Investigator has not substantiated the allegations, an appropriate explanation will be made to the Whistleblower, subject to any privacy and confidentiality rights.

Whistleblower Protection Officer (WPO)

SECURE*corp's* Policy provides for the appointment of the Whistleblower Protection Officer (WPO). The WPO is responsible for protecting the Whistleblower from being victimised as a result of making a report

Any staff member reporting wrongdoing can seek advice from the Whistleblower Protection Officer prior to or after making a report.

The Whistleblower Protection Officer can protect the Whistleblower in a number of ways including, but not limited to the following :

- Ensuring confidentiality in the investigation.
- Protection, as far as legally possible, the staff member's identity.
- Offering a staff member leave of absence while a matter is investigated.
- Relocating the staff member or other staff to a different work group or department.

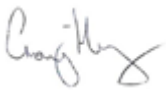
Reporting and Governance

Executive Management Team, or a sub set thereof if appropriate (including Joint Managing Directors) reviews the reports submitted through Executive Access and the investigation results. Reports on *Executive Access* are also provided regularly to the Board.

The Policy is reviewed regularly and whenever there is significant regulatory changes or business needs.

A breach of the Policy may, in some circumstances, may result in disciplinary action or even immediate termination.

Craig Hanley



Chief Executive Officer