

## Board Policy: Complaints and Whistleblowing

**Summary:** This policy outlines Company's approach to handling complaints and whistleblowing, including through maintaining processes to respond to complaints, and protecting those who report wrongdoing.

**Owner:** Public Engagement Committee.

**Adopted / Reviewed:** October 2016.

1. **The Chief Executive** must ensure the Company:
  - articulates that it is committed to conducting its business at all times in a manner that is ethical, lawful, honest, proper, safe
  - ensures that its ways of working actively minimise the risk of operational wrongdoing
  - continually monitors for evidence of wrongdoing.
  
2. **The Chief Executive** must ensure the Company maintain feedback, complaints and whistleblowing procedures that:
  - are documented in a clear and accessible manner
  - provide accessible, safe and confidential points of contact for internal and external stakeholders in each country in which the Company operates
    - For allegations of wrongdoing, corruption, fraud, bribery or other financial impropriety ('whistle blowing'), both the Chair of the Public Engagement Committee and Chair of the Board must be included amongst the possible points of contact.
    - For complaints alleging breach of the ACFID Code of Conduct, complainants must be advised of the ability to make complaints to the ACFID Code of Conduct Committee.
    - Requirements for making complaints must take into consideration the needs of the most vulnerable and consider minority and disadvantaged stakeholders.
  - provide time bound processes for investigation, escalation (which must include the possibility of escalation to the Board via the Public Engagement Committee) and response, in accordance with the principles of respect, accessibility, timeliness and transparency
  - provide for prompt, firm, and fair corrective action where wrongdoing is identified
  - expressly prohibit penalties or retaliation against anyone who makes a complaint or assists in minimising wrongdoing, as long as they act in good faith, on reasonable grounds, and in accordance with the designated process.

**Active compliance reporting:** Quarterly, in *Risk, Compliance and Legal Report*, and annually in *Risk and Compliance Review*.

**See also:** D.2.3 and D.6.2, ACFID Code of Conduct.