



Whistleblower Policy

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Table of Contents

1	Purpose.....	3
2	Scope	3
3	Definitions	3
4	What should be reported under this policy	3
5	Reporting Misconduct.....	4
6	Investigation	4
7	Reporting investigation findings.....	5
8	Whistleblower anonymity.....	5
9	Whistleblower protection	5
10	Feedback and communication with Whistleblower.....	6
11	False Reporting	6
12	Regular Review	6
13	Related Documents.....	6

1 Purpose

Southern Cross Electrical Engineering (SCEE) is committed to creating and maintaining an open working environment in which employees, directors, contractors and consultants are able to raise concerns regarding actual or suspected unethical, unlawful or undesirable conduct.

The Board of SCEE 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 concerns freely and without fear of reprisal or intimidation. The Whistleblower Policy provides such a mechanism, and encourages the reporting of such conduct.

The purpose of this Policy is to:

- Encourage employees, directors, contractors and consultants to report an issue if they genuinely believe a person or persons have breached SCEE’s Code of Conduct, policies or the law;
- Protect individuals who in good faith, report behaviour which they reasonably believe to be corrupt, illegal or unethical on a confidential basis, without fear of reprisal, dismissal or discriminatory treatment; and
- Assist in ensuring that matters of misconduct are identified and dealt with appropriately.

2 Scope

This Policy applies to all employees, directors, contractors and consultants of SCEE and its wholly owned entities.

3 Definitions

Term	Explanation
Misconduct	Means an act or conduct as described in item 4.
Personnel	Means all employees, directors, contractors and consultants of SCEE and its wholly owned entities.
Policy	Means this Whistleblower Policy.
Whistleblower	Means a person being a director, employee, contractor or consultant who, whether anonymously or not, makes, attempts to make or wishes to make a report in connection with Misconduct and where the Whistleblower wishes to avail themselves of protection against reprisal for having made the report.
Whistleblower Officer	Means a designated SCEE representative who has responsibility for conducting preliminary investigations into reports received from a Whistleblower and who has responsibility for protecting a Whistleblower.

4 What should be reported under this policy

SCEE encourages Personnel who have witnessed, or who are aware of, suspected Misconduct to report it in accordance with this Policy.

For the purposes of this Policy, Misconduct which should be reported, whether actual or suspected, includes but is not limited to the following:

- Dishonest, unethical, fraudulent, corrupt or unlawful conduct;
- Conduct that is in breach of SCEE's policies or Code of Conduct;
- Misuse of SCEE funds or assets;
- Conduct that endangers Personnel, or the public generally;
- An abuse of authority;
- Suppression or concealment of any information relating to any of the above types of actions;
- Taking, or threatening to take, detrimental action against anyone who reports suspected Misconduct under this policy.

5 Reporting Misconduct

SCEE Personnel who have any suspicions about Misconduct in the workplace are encouraged to discuss the matter informally with their direct manager or SCEE's Human Resources Manager first to determine whether an incident of Misconduct has occurred. This is an opportune time to clarify the incident, ask questions and become familiar with the process. At all times, discussions will remain confidential.

Where this is not appropriate, or where the whistleblower does not feel comfortable in doing so, or where the whistleblower has previously done so and believes no action has been taken, the whistleblower should report the incident directly to one of the following Whistleblower Officers:

- Company Secretary; or
- Commercial Director

SCEE will investigate any reported Misconduct. However, it is difficult to investigate reports which consist of anonymous 'tip-offs'. Therefore, Whistleblowers are encouraged to identify themselves and to provide all known details of any alleged Misconduct when making their report.

6 Investigation

All reports of Misconduct will be the subject of a thorough investigation with the objective of locating substantiating evidence that either supports or refutes the claims made by the whistleblower.

Any such investigation will be conducted by the Whistleblower Officer and will follow best practice investigation and will be fair and independent of the whistleblower or any other person being the subject of the report.

SCEE will investigate all reports discreetly and may at its absolute discretion, employ external resources to assist with an investigation to ensure both the perception and reality of objectivity is maintained particularly where the allegation is serious.

7 Reporting investigation findings

At the end of the investigation, the Whistleblower Officer will report their findings to the Chief Executive Officer (CEO) who will determine the appropriate response. This response will include addressing any unacceptable conduct and taking remedial action required to prevent any future occurrences of the same Misconduct.

In the event of the CEO being the subject of an investigation or allegation, the Chairman of the Audit and Risk Committee will determine the report and corrective measures. All investigation outcomes will be reported to the Audit and Risk Committee.

Where allegations of unacceptable conduct made against another person cannot be substantiated, that person will be advised accordingly and will be entitled to continue in their role as if the allegations had not been made.

8 Whistleblower anonymity

If requested, the identity of the whistleblower will be kept strictly confidential unless:

- The person making the report consents to the disclosure.
- The disclosure is required by law.
- The disclosure is necessary to prevent or lessen a serious threat to a person's health or safety.
- It is necessary to protect or enforce SCEE's legal rights or interests.
- It is necessary to defend any claims.

9 Whistleblower protection

A whistleblower who report matters in good faith, and provided he or she has not been involved in the Misconduct reported, will not be penalised or personally disadvantaged because they have reported a matter. SCEE will not tolerate any instances of legitimate whistleblowers being:

- dismissed;
- demoted;
- subjected to any form of harassment and persecution; or
- discriminated against.

Any SCEE employee, director, contractor or consultant who is found to have dismissed, demoted, harassed, or discriminated against a whistleblower by reason of their status as a whistleblower, may be subjected to disciplinary measures.

A whistleblower who has been involved in the reported Misconduct may be provided with immunity or due consideration from SCEE initiated disciplinary proceedings, by agreement with SCEE. SCEE however, has no power to provide immunity from criminal prosecution.

10 Feedback and communication with Whistleblower

When a person makes a report of Misconduct, SCEE will ensure that the whistleblower is updated on the outcomes of the investigation, subject to the general considerations of privacy of those who have had allegations made against them and customary practices of confidentiality within SCEE.

All whistleblowers must maintain confidentiality of all such reports, and not disclose details to any person.

11 False Reporting

Where it has been established that a person has knowingly or recklessly made a false report of Misconduct, that conduct itself should be considered a serious matter and render the person concerned subject to disciplinary proceedings as provided by SCEE's Code of Conduct or other appropriate Policies.

Whilst not intending to discourage whistleblowers from reporting matters of genuine concern, whistleblowers must ensure as far as possible, that reports are factually accurate, complete, from first-hand knowledge, presented in an unbiased fashion (and any possible perception of bias of the whistleblower is disclosed), and without material omission.

12 Regular Review

The Whistleblower Policy will be reviewed regularly to ensure that it remains current and effective.

13 Related Documents

Document ID	Document Title
SCEE-MN-CG-POL-0007	Code of Conduct Policy
SCEE-MN-CG-POL-0002	Anti-bribery and Corruption Policy