

Whistleblower Policy

1 Overview

- 1.1 Within the ACOR Group of Companies ("ACOR") we are guided by our values. These values are the foundation of how we conduct ourselves and interact with each other, our clients, members, supplies, shareholders and other stakeholders. ACOR is committed to observing the highest standards of fair dealing, honesty and integrity in our business activities.

2 Purpose

- 2.1 The purpose of this Policy is to promote and support our culture of honest and ethical behaviour, good corporate governance and corporate and financial compliance. ACOR encourages the reporting of reasonably held concerns of suspected or actual unethical, illegal, corrupt, fraudulent or undesirable conduct involving ACOR and provides protections and measures to individuals who make a disclosure in relation to such conduct without fear of victimisation or reprisal. This Policy will be made available on ACOR's website and in any other ways that will ensure that it is made available to persons to whom this Policy applies. It will also be made available to officers and employees of ACOR on Employment Hero.

3 Scope

- 3.1 This Policy applies to any person who is, or has been, any of the following with respect to ACOR:
- Employee;
 - Officer;
 - Director;
 - Contractor (including sub-contractors and employees of contractors);
 - Supplier (including employees of suppliers);
 - Consultant;
 - Auditor;
 - Associate; and
 - Relative, dependent, spouse, or dependent of a spouse of any of the above.

4 Reportable Conduct

- 4.1 You may make a report or disclosure under this Policy if you have reasonable grounds to believe that an ACOR director, officer, employee, contractor, supplier, consultant or other person who has business dealings with ACOR has engaged in conduct ('Reportable Conduct') which is:
- Dishonest, misleading, fraudulent or corrupt;
 - Illegal (such as theft, dealing in or use of illicit drugs, violence or threatened violence and criminal damage to property);
 - A breach, including a threatened or potential breach, of any legislation or regulations;
 - Unethical including any breach of ACOR's policies;
 - Grossly negligent or conduct which is indifferent to the adverse consequences of that party's actions;

- Potentially damaging to ACOR, its employees or a third party including ACOR's brand and business reputation;
- Misconduct or an improper state of affairs;
- A danger which represents a danger to the public, risks compromising corporate financial systems or Australian taxation laws; and
- Harassment, discrimination, victimisation or bullying.

4.2 For the avoidance of doubt, Reportable Conduct does not include personal work-related grievances. These grievances should be reported to your manager in accordance with the Grievance Policy. A personal work-related grievance is a grievance about any matter in relation to a staff member's current or former employment, having implications (or tending to have implications) for that person personally and that do not have broader implications for ACOR. Examples of personal work-related grievances are as follows:

- An interpersonal conflict between the staff member and another employee;
- A decision relating to the engagement, transfer or promotion of the staff member;
- A decision relating to the terms and conditions of engagement of the staff member; and
- A decision to suspend or terminate the engagement of the staff member, or otherwise to discipline the staff member.

5 Making a Disclosure

5.1 ACOR relies on its personnel maintaining a culture of honest and ethical behaviour. Accordingly, if you become aware of any Reportable Conduct occurring or about to occur, it is expected that you will make a disclosure under this Policy in good faith and not for personal gain. When making a report under this Policy, you must have reasonable grounds to suspect that the information concerns Reportable Conduct. Reports should provide ACOR with as much detail as possible to assist in investigating the matter. Details can include:

- A Statement describing the Reportable Conduct;
- Name of the person(s) involved;
- Dates, times and locations;
- Details of any relevant transactions;
- Copies of any relevant documents;
- Names of possible witnesses; and
- Steps already taken to report or address the matter (if any).

5.2 Before raising a concern, it is not necessary to investigate, actively seek out additional factual information or conduct a private investigation.

5.3 You may contact a Whistleblower Protection Officer at any time before or after making a report under this Policy if you have any concerns about making a report, confidentiality or the protections that may be available under this Policy or relevant legislation.

5.4 If you have concerns about the Whistleblower Protection Officer, you should contact the Chairman of the Board.

5.5 Making a report under this Policy will not excuse any legal duty to report such matters externally, for example to government, law enforcement or other regulatory authorities. However, notification under this

Policy will allow provision of appropriate advice and enable ACOR to provide you with legal and other support.

- 5.6 There are several ways in which you may report or disclose any issue or behaviour which you consider to be Reportable Conduct.

Internal Reporting

- 5.7 You may disclose any Reportable Conduct to the Whistleblower Protection Officers listed below:

Nicole Brewer	Manager - People Services	Email: nbrewer@acor.com.au	Phone 02 9438 5098
Sheridan Collins	Company Secretary	Email: scollins@acor.com.au	Phone 0428 814 476
Jennifer Kerkin	Legal Advisor	Email: jkerkin@acor.com.au	Phone 0410 659 685
Michael Goodwin	Managing Director	Email: mgoodwin@acor.com.au	Phone 0417 225 876

- 5.8 If you are unable to use any of the above reporting channels, a disclosure can be made to any other "Eligible Recipient" within ACOR. If you make a report to an Eligible Recipient, you must identify the report as a whistleblower report under this Policy. Eligible Recipients include:

- Officers;
- Directors;
- Senior Managers; and
- Auditor or member of an audit team conducting an audit of ACOR.

- 5.9 The Whistleblower Protection Officers and Eligible Recipients are bound by this Policy and will safeguard your interests and will ensure the integrity of the reporting mechanism.

External Reporting

- 5.10 You may wish to make a report via an email to whistleblower@acor.com.au or anonymously by sending a letter addressed to:

Private & Confidential
The Whistleblower Protection Officer
ACOR Consultants Pty Ltd
Suite 2, Level 1,
33 Herbert St
St Leonards NSW 2065

Anonymity

- 5.11 When making a disclosure, you may do so anonymously. It may be difficult for ACOR to properly investigate the matters disclosed if a report is submitted anonymously and therefore ACOR encourages you to share your identity when making a disclosure, however you are not required to do so.
- 5.12 If you do not provide contact details or consent for us to contact you, we will not be able to provide you with feedback on our investigation or advise what steps we have taken in response to your report.

Reporting to Regulators

- 5.13 You may also make a disclosure to the Australian Securities and Investments Commission (ASIC) or the Australian Prudential Regulation Authority (APRA) in relation to a Reportable Conduct. You will be covered by the protections outlined in this Policy if you have reported your concerns to ASIC or APRA. If you make a report to ASIC or APRA, where practicable and reasonable, you should also notify ACOR of the report.

Reporting to a Legal Practitioner

- 5.14 You may choose to discuss your concerns with a legal practitioner for the purposes of obtaining legal advice or representation. You will be covered by the protections outlined in this Policy if you have reported your concerns to a legal practitioner.
- 5.15 You can instruct the legal practitioner to make a report on your behalf (including if you wish to remain anonymous). We will be able to liaise with the legal practitioner to conduct our investigation and provide feedback.

Emergency Disclosure

- 5.16 If you believe that Reportable Conduct is occurring, or is about to occur, which poses a real and imminent threat, endangering the health and safety of any person, we recommend that you immediately report the matter to law enforcement authorities or emergency services. Once the threat or danger has abated, we recommend that you make a report, where appropriate, via the Internal or External Reporting avenues above.

6 Investigation

- 6.1 Upon receipt of a report under this Policy, the Whistleblower Protection Officer will carry out a preliminary review of the report and promptly provide the report to the most appropriate person within ACOR to conduct an investigation of the matter. The original Whistleblower Protection Officer receiving the report may retain the report and conduct an investigation, or refer it to another Whistleblower Protection Officer. This will be determined at the discretion of the Whistleblower Protection Officer, including by reference to the nature of the report. The person conducting the investigation will make initial inquiries and will determine at their discretion whether it is appropriate or necessary to conduct further inquiries or whether the concern can be resolved by other appropriate action.
- 6.2 If there is to be a further inquiry, that inquiry or investigation may be conducted by another party including senior manager, a member of the Human Resources team or, at the discretion of ACOR, by an external person. The investigator must not be implicated directly or indirectly in the report. All inquiries and/or investigations will be conducted in a fair, independent and timely manner and all reasonable efforts will be made, as far as practicable, to preserve confidentiality during the inquiry and/or investigation, including to de-identify you, if appropriate and practicable.
- 6.3 ACOR will investigate all matters reported under this Policy as soon as practicable after the matter has been reported.
- 6.4 If the report is not anonymous, the Whistleblower Protection Officer or external investigator will contact you to discuss the investigation process and any other matters that are relevant to the investigation.
- 6.5 Where you have chosen to remain anonymous, your identity will not be disclosed to the investigator or to any other person and ACOR will conduct the investigation based on the information provided to it.
- 6.6 Where possible, the Whistleblower Protection Officer will provide you with feedback on the progress and expected timeframes of the investigation. The person against whom any allegations have been made will also be informed of the concerns and will be provided with an opportunity to respond (unless there are any restrictions or other reasonable bases for not doing so).
- 6.7 To the extent permitted by law, the Whistleblower Protection Officer may inform you and/or a person against whom allegations have been made of the findings. Any report will remain the property of ACOR and will not be shared with you or any person against whom the allegations have been made.

7 Protection of Whistleblowers

- 7.1 ACOR is committed to ensuring that any person who makes a disclosure is treated fairly and does not suffer detriment and that confidentiality is preserved in respect of all matters raised under this Policy.

Protection from Legal Action

- 7.2 You will not be subject to any civil, criminal or administrative legal action (including disciplinary action) for making a disclosure under this Policy or participating in any investigation.
- 7.3 Any information you provide will not be admissible in any criminal or civil proceedings other than for proceedings in respect of the falsity of the information.
- 7.4 ACOR does not approve of the use of this Policy to pursue personal grudges or to act in bad faith in making a report. ACOR disapproves of the making of deliberately false, disingenuous and/or time-wasting complaints. A person making a report in these circumstances will not be afforded protection under this Policy. In addition, a person making a report is not automatically protected from the consequences of being a party to any improper, unethical or illegal conduct they report under this Policy.

Protection against Detrimental Conduct

- 7.5 ACOR (or any person engaged by ACOR) will not engage in 'Detrimental Conduct' against you if you have made a disclosure under this Policy.
- 7.6 Detrimental Conduct includes actual or threatened conduct such as the following (without limitation):
- Termination of employment;
 - Injury to employment including demotion, disciplinary action;
 - Alternation of position or duties;
 - Discrimination;
 - Harassment, bullying or intimidation;
 - Victimisation;
 - Harm or injury including psychological harm;
 - Damage to person's property;
 - Damage to a person's reputation;
 - Damage to a person's business or financial position; or
 - Any other damage to a person.
- 7.7 ACOR will take all reasonable steps to protect you from Detrimental Conduct and will take necessary action where such conduct is identified.
- 7.8 ACOR also strictly prohibits all forms of Detrimental Conduct against any person who is involved in an investigation of a matter disclosed under the Policy in response to their involvement in that investigation. A person's status or position within ACOR will not be affected by raising a concern. However, if the person is already the subject of a disciplinary investigation or procedure, this will not be halted as a result of the reporting of a concern under this Policy.
- 7.9 If you are subjected to Detrimental Conduct as a result of making a disclosure under this Policy or participating in an investigation, you should inform a Whistleblower Protection Officer or Eligible Recipient in accordance with the reporting guidelines outlined above.
- 7.10 You may also seek remedies including compensation, civil penalties or reinstatement where you have been subject to any Detrimental Conduct.

Protection of Confidentiality

- 7.11 All information received from you will be treated confidentially and sensitively.
- 7.12 If you make a disclosure under this Policy, your identity (or any information which would likely to identify you) will only be shared if:
- You give your consent to share that information; or
 - The disclosure is allowed or required by law (for example where the concern is raised with a lawyer for the purposes of obtaining legal advice);
 - The concern is reported to the Australian Securities and Investments Commission (ASIC), the Australian Prudential Regulation Authority (APRA), the Australian Taxation Office (ATO) or the Australian Federal Police (AFP).
- 7.13 Where it is necessary to disclose information for the effective investigation of the matter, and this is likely to lead to your identification, all reasonable steps will be taken to reduce the risk that you will be identified.

Reporting to the Board

- 7.14 ACOR will maintain a record of all reports in accordance with this Policy and provide quarterly and annual reports to the Board of Directors. These reports will describe historical trends of the number, types and severity of reports, investigations conducted, and actions taken by management. Where possible, the name and identity of the person making raising the concern will not be disclosed.

Company Disclosures

- 7.15 As far as possible, and subject to the need to conduct proper investigations, to take any consequential disciplinary steps, meet legal and regulatory requirements and where appropriate, obtain the assistance of external advisers, ACOR is committed to preserving the confidentiality of the identity of the person making the report and the nature of the report. The person making a report must maintain confidentiality of any information they report as well as what might be provided to them by ACOR in relation to the report and any investigation.
- 7.16 Information provided to ACOR and the identity of the person making the report or any information which would tend to identify the person will not be released to anyone not involved in the conduct of the investigation or implementation of any findings and recommendations (including any disciplinary actions). Disclosures that involve a threat to life or property, illegal activities or legal action may require actions that do not allow for complete anonymity. In such cases, if it is necessary to disclose the identity of the person making a report, reasonable steps will be taken prior to any disclosure.
- 7.17 The Board will evaluate whether any allegations or findings of illegal conduct should be disclosed to any governmental entities, law enforcement authorities, financing agencies, or other third parties. The Board will also consider what disclosures are appropriate under securities laws or other requirements.

8 Support Available

- 8.1 Employees who make a disclosure under this Policy or are implicated as a result of a disclosure that is made may access ACOR's Employee Assistance Program (EAP) which is a free and confidential counselling service. The contact details of this service are located on the ACOR Intranet.
- 8.2 Where appropriate, ACOR may also appoint an independent support person from the Human Resources team to deal with any ongoing concerns you may have.
- 8.3 You may also access third party support providers such as Lifeline (13 11 14) and Beyond Blue (1300 22 4636) for support.

9 Other Matters

- 9.1 Any breach of this Policy will be taken seriously and may result in disciplinary action, up to and including termination of employment.
- 9.2 In so far as this Policy imposes any obligations on ACOR, those obligations are not contractual and do not give rise to any contractual rights. To the extent that this Policy describes benefits and entitlements for employees, they are discretionary in nature and are also not intended to be contractual. The terms and conditions of employment that are intended to be contractual are set out in an employee's written employment contract.
- 9.3 ACOR may unilaterally introduce, vary, remove or replace this Policy at any time.
- 9.4 Employees are encouraged to read this Policy in conjunction with other relevant Company policies, including:
 - BSS-POL-NAT-HR01 Code of Conduct.
 - BSS-POL-NAT-HR08 Grievance Policy