

POLICY

CORP-HR-POL-018

Whistleblower Policy

Energy Power Systems Australia (EPSA) is committed to living our values and demonstrating that Together We are Better. Our Values and Behaviour statement reflects our expectations: Honesty – With integrity, we win the right way.

Scope

This policy aims to ensure that team members and directors can raise concerns in a safe and protected process.

This Policy applies to all employees at EPSA. They are referred to as 'team members' for the purpose of this policy.

Purpose

This policy aims to encourage people to report an issue if they genuinely believe someone has contravened the EPSA Code of Conduct or breached their employment contract, working conditions or the law, or where EPSA systems or controls are not working effectively or as intended.

Guarding against Bribery and Corruption

The Company takes a zero-tolerance approach towards bribery and corruption, and is committed to behaving professionally, fairly and with integrity in all of its business dealings and relationships wherever the Company operates. The consequences of bribery and corruption are severe. The Company takes its legal responsibilities very seriously. You must not influence others or be influenced, either directly or indirectly, by paying or receiving bribes or kickbacks or any other measures that are unethical or could tarnish the Company's reputation.

Team Member Responsibilities

You must comply with all applicable anti-corruption and bribery laws and regulations in all countries in which the Company operates. You must not directly or indirectly promise, offer, grant or authorise the giving of money or anything else of value, to Government Officials, Officers of private enterprises or Connected Persons to obtain or retain a business or an advantage in the conduct of business. These include:

- Commissions that you have reason to suspect will be perceived as bribes or have reason to suspect will be used by the recipient to pay or for other corrupt purposes; and
- Facilitation of payments which are regarded as payments to Government Officials to gain access, secure or expedite the performance of a routine function they are in any event obligated to perform. The Company does not allow facilitation payments to be made;
- You must inform the General Manager of the appropriate division when encountered with any request for a facilitation payment. If you have made any payment which could possibly be misconstrued as a facilitation payment, the General Manager of the appropriate division must immediately be notified and the payment recorded accordingly;
- You must also refrain from any activity or behaviour that could give rise to the perception or suspicion of any corrupt conduct. Promising, offering, giving or receiving any improper advantage in order to influence the decision of the recipient or to be so influenced may result in disciplinary action and/or criminal charges.

What concerns should be raised?

All team members and directors of EPSA are encouraged to report any genuine matters of concern that they honestly believe contravene EPSA's Code of Conduct. This will include:

- EPSA systems or controls are not working effectively or as intended;
- Conduct or practices that are illegal;
- Corrupt activities;
- Theft, fraud, misappropriation;
- Significant mismanagement of funds and resources;
- Abuse of authority; and
- Serious harm to public or team member safety.

Protection of Whistleblowers

A whistleblower will not be discriminated against or disadvantaged for making a report in accordance with this policy. This applies if the matter is proven or not, regardless of whether it is reported to an external authority. EPSA will not disclose the identity of any person who makes a whistleblower report unless:

- it is required to do so by law;
- it is required to assist a police investigation;
- the identity of the whistleblower would be self-evident by the nature or location of the report; or
- it is impossible to investigate the issue without divulging the identity of the whistleblower.

In all instances where the identity of the whistleblower is likely to be disclosed, EPSA will try to give prior notice to the whistleblower.

Responsibility to act in good faith

Whistleblowing is about reporting real or perceived malpractice. If a report is not made in good faith, or is found to be malicious, deliberately misleading, or frivolous, the Whistleblower may be subject to disciplinary action.

Procedure for Reporting

A person who becomes aware of any matter of concern or behaviour that they think seriously contravenes the EPSA Code of Conduct, Conflict of Interest policy or the law should raise the matter as follows (in order):

- with their immediate supervisor (if a team member); or
- with the Managing Director of EPSA; or
- by lodging a complaint at our Whistleblowing Platform.
 - go to Energy Power | whistleblowingservice.com.au.
 - click on the 'Make a Report' button. You will be redirected to the new page where you need to:
 - enter "EPS" in the 'Unique Key' field;
 - enter "eps2023" in the "Client Reference Number";
 - click "Next".

Investigating Concerns

EPSA will investigate all reported concerns and where appropriate will provide feedback regarding the outcome. EPSA will take any necessary action as a result of a report and if no action is taken will give an explanation.

Application

This policy may be reviewed, varied, added to or withdrawn by Energy Power Systems Australia (EPSA) at any time, at the Company's absolute discretion. This policy, and any amendments to it, do not form a part of a team member's contract of employment. Various parts of the policy may require managers and staff to exercise discretion and the policy is not intended to be applied in a legalistic or prescriptive manner.

Key Information

Owner	General Manager Human Resources
Business unit	Human Resources
Filename	CORP-HR-POL-018 Whistleblower Policy
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Contact for enquiries	Human Resources Team

Document Version History

Prepared by	Document Owner	Rev	Authorised by	Date of Release
Caroline Power	Human Resources	1	Chris Murray	September 2020
Caroline Power	Human Resources	2	Chris Murray	July 2023

Revision	Change Details
1.0	detail
2.0	New document format, annual review

