



WHISTEBLOWER POLICY

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Revision Record

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1 Purpose

Directors, employees, contractors and business partners, collectively referred to as “Our People” in this document, are expected to observe high standards of business and personal ethics in the conduct of their duties and responsibilities as set out in Leichhardt’s Code of Conduct. Our People must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

The aim of this Policy is to ensure that Our People comply with these obligations. It also encourages reporting of Improper Conduct or suspected Improper Conduct and provides effective protection from victimisation or dismissal to those reporting by implementing systems for confidentiality and report handling.

This Policy should be applied in conjunction with Leichhardt’s Code of Conduct that underpins the way Our People operate. The reputation of Leichhardt depends on Our People behaving in a way which is consistent with the Code of Conduct.

2 Who is covered by this Policy?

It is the responsibility of Our People to comply with Leichhardt’s Code of Conduct and report Improper Conduct or suspected Improper Conduct in accordance with this Policy. The term “Improper Conduct” is defined in Clause 3 of this Policy.

This Policy applies to a report of Improper Conduct or suspected Improper Conduct which is made by individuals who are, or have been, any of the following:

- a) a director or employee of Leichhardt;
- b) a contractor or business partner of Leichhardt;
- c) an employee of a contractor or business partner of Leichhardt;
- d) an individual who is an associate of Leichhardt, for example a director of a related company of Leichhardt; and
- e) a parent, grandparent, child, grandchild, sibling, spouse or dependent of any of the above.

In this policy, each person in the categories listed above is referred to as a “Disclosing Person.”

3 What kind of conduct can you report under this Policy?

A Disclosing Person is encouraged to report conduct which constitutes Improper Conduct or suspected Improper Conduct.

Improper Conduct is information which gives a Disclosing Person reasonable ground to suspect:

- a) misconduct or an improper state of affairs or circumstances in relation to Leichhardt; or
- b) indicates that Leichhardt or any of Our People have engaged in conduct that:

- (i) breaches the Corporations Act 2001 (Cth) or Australian Securities and Investments Commission Act 2001 (Cth);
- (ii) constitutes an offence against other laws of the Commonwealth that are punishable by imprisonment for a period of 12 months or more; or
- (iv) represents a danger to the public or the financial system.

Some examples of what may be disclosed include:

- a) illegal conduct, such as theft, dealing in, or use of, illicit drugs, actual or threatened violence, corruption, bribery, criminal damage to property or breaches of work health and safety laws;
- b) serious breaches of Leichhardt Policies, unsafe work, environmental or health practices or abuse of Leichhardt's property or resources;
- c) negligence, fraud, dishonesty, unethical conduct or corruption, serious impropriety (including in relation to the tax affairs of Leichhardt) or conduct which is prohibited under Leichhardt's Anti-Bribery, Corruption and Money-Laundering Policy;
- d) engaging in or threatening to engage in detrimental conduct against a Disclosing Person or an individual who is believed or suspected to have made, or be planning to make, a disclosure.

Improper conduct may involve unlawful conduct, but this is not essential, including for example in relation to unethical or dishonest behaviour or practices.

A Disclosing Person can still qualify for protection under Australian law even if their disclosure turns out to be incorrect provided, they had objectively reasonable grounds to suspect the disclosure was correct.

It is a serious disciplinary offence to make allegations that prove to be unsubstantiated and made maliciously or known to be false.

This Policy does not cover personal work-related grievances which should be addressed separately through relevant Leichhardt Policies.

4 Reporting

This Policy is intended to encourage and enable Our People to raise serious concerns within Leichhardt. In most cases, employees should approach their manager first as they may be in the best position to address a concern.

If employees are not comfortable speaking to their manager or not satisfied with their manager's response, they are encouraged to speak with anyone in management whom they are comfortable in approaching. Managers are required to report suspected violations of this Policy to the Authorised Officer, who has responsibility to investigate reported violations. Nomination of this role may change from time to time at the discretion of the Board.

Leichhardt's nominated Authorised Officer is Denise Goldsworthy, Leichhardt Director.

Denise Goldsworthy	Telephone	0407 429 584
	Email	denise.goldsworthy@leic.com.au
	Mail	Leichhardt Industrials Group Pty Ltd Suite A7, First Floor, 435 Roberts Road, Subiaco, 6008, WA Please mark 'Private and Confidential.'

Alternatively, Improper Conduct or suspected Improper Conduct may be disclosed via a confidential and external party whistleblowing service via the following link:

[Leichhardt | whistleblowingservice.com.au](https://leic.com.au/whistleblowingservice.com.au)

How do I make a report?

To make an **“Online”** report please click on the 'Make a Report' button below. You will be redirected to the new page where you need to enter **‘Leichhardt’** in the **‘Unique Key’** field. Click on 'next' and follow the prompt. You will then be asked for your **“Client Reference Number”** that is **“Leichhardt2023”**.

To enable the efficient investigation of the reported conduct, Leichhardt encourages a Disclosing Person to provide as much information as possible, which may include:

- a) Important date(s), time(s) and location(s);
- b) Name(s) of person(s) involved and potential witness(s);
- c) Supporting evidence (emails, messages, documents etc);
- d) Steps a Disclosing Person may have already taken to report the matter or resolve the concern.

No Retaliation

No Disclosing Person who reports Improper Conduct or suspected Improper Conduct under this Policy on objectively reasonable grounds to suspect such violation has occurred, shall suffer detriment, either actual or threatened, harassment, retaliation or adverse employment or engagement consequence. If one or more Our People retaliates against someone who has reported Improper Conduct or suspected Improper Conduct on objectively reasonable grounds of suspicion, they will be subject to discipline up to and including termination of employment or services.

5 Case Management

The Authorised Officer is responsible for investigating and resolving all reported incidents of Improper Conduct or suspected Improper Conduct.

The Authorised Officer has direct access to the Board and is required to report to the Board at least annually on compliance activity.

If any person is not comfortable speaking with the Authorised Officer on a particular matter or if they are unavailable and the matter is urgent, they should contact the Chairperson or another member of the Board.

The Authorised Officer will notify the person who reported the Improper Conduct or suspected Improper Conduct and acknowledge receipt of the report within five (5) business days. All reports will be promptly investigated and, if warranted, appropriate corrective action will be taken.

6 Confidentiality

Reports of Improper Conduct or suspected Improper Conduct, whether made in the Disclosing Person's name or anonymously, will be kept confidential and details of the report, or the Disclosing Person, will only be released to those necessarily involved in the investigation, unless the Disclosing Person consents or the Company is obliged or allowed by law to disclose, such as disclosures to Australian Securities and Investment Commission, the Australian Federal Police, or a legal practitioner for the purpose of obtaining advice about the application of the Disclosing Person's protections.

Leichhardt will ensure that any records relating to a report of Improper Conduct or suspected Improper Conduct are stored securely and confidentially and are able to be accessed only by the Company directors or employees who are authorised to access the information for the purposes of the investigation.

Unauthorised disclosure of:

- a) the identity of the Disclosing Person who has made a report of Improper Conduct or suspected Improper Conduct; or
- b) information from which the identity of the reporting person could be inferred,

may be an offence under Australian law and will be regarded as a disciplinary matter.

There are certain legal protections available to a Disclosing Person. Further information on this may be made available via the Authorised Officer or Whistleblower Hotline.