

## WHISTLEBLOWER POLICY

### 1. PURPOSE

At Civilmart are committed to the highest levels of ethics and integrity in the way that we do business.

You can use this policy to report your concerns about illegal, unethical or improper conduct, including misconduct or circumstances relating to Civilmart Group, including Precast Civil Industries Pty Ltd, Transfab Holdings Pty Ltd and their related bodies corporate as defined by section 50 of the Corporations Act (**Civilmart**). Civilmart's Whistleblower Policy is an important element in detecting corrupt, illegal or other undesirable conduct.

This policy applies to all Civilmart directors, officers, employees and contractors and to any other person notified that this policy applies to them.

The standards which guide our everyday conduct are outlined in our Code of Conduct. We strongly encourage you to speak up if you suspect or witness any matters of concern. Civilmart will take all reports made under this Policy seriously.

### 2. PRINCIPLES

- If you have concerns about conduct which may be illegal, unethical or improper, we encourage you to speak to your direct manager or supervisor in the first instance. However, if you are worried about doing this you can raise your concerns through our independent external whistleblowing service.
- We expect our employees to report their concerns about misconduct or wrongdoing.
- We will take all reports made under this Policy seriously, and will support and protect you as we investigate your concerns.
- We will not tolerate reprisal action against anyone who has made, intends to make, or is suspected of making a report in good faith under this Policy.

### 3. SCOPE

#### Who is a whistleblower?

You can report a concern under this Policy if you are:

- a current or former director, officer, employee of Civilmart,
- someone who provides or has provided goods or services to Civilmart, whether paid or unpaid, including contractors, consultants and suppliers as well as their current and former employees,
- a relative or family member of any of these people.

#### What is Reportable Conduct?

For the purposes of this Policy, you have a responsibility to report concerns if you have reasonable grounds to suspect or become aware of misconduct in the following areas:

- a breach of Civilmart's internal policies, including the Code of Conduct
- a breach of any law (such as competition law, modern slavery and/or human rights standards misappropriation, insider trading, market manipulation or corrupt practices).

- unethical or unprofessional behaviour (such as anti-competitive practices; bribery and corruption, breaches of privacy and confidentiality, gross negligence, bullying, harassment, and non-adherence to internal compliance policies).
- behaviour which raises issues of honesty or integrity (such as fraud, money laundering or misappropriation of funds) conduct that represents a danger to the public or health and safety of any individual (such as practices that endanger the safety of employees/the public, unsafe or unhealthy working practices, non-compliance with required practices, violence or threatened violent, criminal damage to property)
- conduct that affects the stability of or confidence in the financial system.

Reportable Conduct excludes personal work-related grievances such as interpersonal conflicts between you and another employee, or decisions relating to your employment such as a transfer, promotion, or disciplinary action. Work-related grievances must be raised with your Manager or People & Culture Advisor. It also excludes customer complaints about Civilmart's products or services, which are managed by raising a NCR in Skytrust.

## 4. MAKING A REPORT

When making a report under this policy, you are encouraged to provide as much information as possible, including details of the Reportable Conduct, people involved, dates, locations and any evidence that may exist, including supporting documentation (if any).

Before making a report, you should satisfy yourself that you have reasonable grounds to suspect misconduct. Nevertheless, a whistleblower does not need to prove an allegation and you will not be subject to a penalty if the information turns out to be incorrect.

You must not make a report that you know is untrue or is misleading. This may be a breach of our Code of Conduct and will be considered a serious matter which may result in disciplinary action. There may also be legal consequences if you knowingly make a false report.

### **Reporting matters internally**

You are encouraged to report your concerns to your direct manager or supervisor in the first instance, who may be able to resolve them quickly and successfully.

Where this is not appropriate or possible, or where you do not feel comfortable raising the matter with your direct manager or supervisor, you can report it to any of the Whistleblower Protection Officers (WPO) listed below:

- National People & Culture Manager
- Chief Financial Officer
- Legal Counsel and
- Company Secretary

The Whistleblower Protection Officer will safeguard your interests and will ensure the integrity of the reporting mechanism.

## Reporting matters externally

### External Whistleblowing Hotline Service for Disclosers

You may also report your concerns through Civilmart's external independent whistleblowing service using any of the following methods:

[CivilMart | whistleblowingservice.com.au](https://civilmart.whistleblowingservice.com.au)

- click on the 'Make a Report' button below
- You will be redirected to the new page where you need to:
- enter "**CivilMart**" in the 'Unique Key' field
- enter "**CivilMart2023**" in the "Client Reference Number"
- click "Next"

### Calling

- 1300 687 927

It is Civilmart's preference that disclosures about improper conduct are made through our designated whistleblowing channels. However, you may also make an internal disclosure to:

- an officer or senior manager of Precast Civil Industries Pty Ltd or a related body corporate; or
- an auditor or a member of an audit team conducting an audit of Precast Civil Industries Pty Limited or a related body corporate.

### Reporting to other external parties

In addition to being reportable under this policy, disclosures about protected matters (as defined in the Whistleblower laws) can be reported directly to an external regulatory body including:

- the Australian Securities and Investments Commission (ASIC);
- Australian Prudential Regulatory Authority (APRA); and
- the Commissioner of Taxation (for a protected disclosure under the Taxation Administration Act).

For more information about the Whistleblower laws (including how to make a disclosure directly to ASIC or the ATO), see the information available on the [ASIC website](#) and the [ATO website](#).

The Corporations Act also enables you to make a public interest disclosure or an emergency disclosure about a protected matter to a journalist or a Member of Parliament in certain limited circumstances.

We recommend you seek independent legal advice (at your own cost) before reporting any concern to an external body, a journalist or a Member of Parliament.

You may also be legally required to report certain matters to government agencies or authorities. Nothing in this Policy is intended to prevent any person from reporting possible breaches of laws to relevant government agencies or authorities.

## 5. PROTECTIONS AND SUPPORT

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

### **Confidentiality and anonymity**

All disclosures in accordance with the policy will be treated confidentially and shared only to the extent necessary to allow an investigation or to determine what action is appropriate.

Where you make a disclosure, your identity (or any information which could identify you) will only be shared where you provide consent; or where we are required by law to disclose your identity.

You may choose to make an anonymous report, however requiring complete anonymity may make it more difficult for us to investigate the matter. We therefore encourage you to share your identity when making a disclosure.

If you wish to remain anonymous, we encourage you to check the Whistleblowing Service regularly to respond to any follow-up questions and check the status of the investigation.

### **Protection from detriment**

Civilmart will not tolerate any form of detrimental conduct (actual or threatened) taken by any person against a whistleblower or any people who are involved in an investigation of a whistleblower report.

Detrimental conduct includes the following termination of employment, demotion or disciplinary action, harassment, bullying or intimidation, victimisation, harm or injury (including psychological harm), damage to any person, property, reputation, business or financial position or other unfavourable treatment connected with making a report.

If you experience any detrimental conduct (actual or threatened), you should contact your WPO or the Whistleblowing Service. You can also report detrimental conduct under this policy.

### **Protection civil, criminal and administrative liability**

If you make a disclosure protected by the Whistleblower laws, you will also be protected from any:

- civil liability – e.g., any legal action against you for breach of an employment contract, duty of confidentiality or another contractual obligation;
- criminal liability – e.g., prosecution for unlawfully releasing information or unlawfully using your disclosure against you in a prosecution; and
- administrative liability – e.g., disciplinary action for making a disclosure.

### **Limitations on protections**

Protections under this policy may not apply if you make an allegation you know to be false, or otherwise act in bad faith. They will not apply if you provide information only after being required to do so by law, or after being approached during a separate investigation of the matter.

Protections are not guaranteed under this policy if the alleged wrongdoing is reported to a recipient who is not authorised to receive that disclosure, such as the media or members of the public.

### **Support**

Civilmart will support you where you have concerns about confidentiality, retaliation, or the investigation process.

Where appropriate, Civilmart may appoint an independent support person from the People and Culture team to deal with any ongoing concerns you may have.

You may also access Civilmart's Employee Assistance Programme **AccessEAP** (1800 818 728) or other third-party support providers such as **Lifeline** (13 11 14) and **Beyond Blue** (1300 22 4636) for support.

## 6. INVESTIGATING A REPORT

Civilmart will consider all matters reported under this Policy as soon as practicable after the matter has been reported.

We will assess the matter carefully to determine whether an investigation is required. Where there is sufficient information to enable us to form a reasonable basis for investigation, we will appoint an internal or external investigator. All investigations will be conducted in a fair, independent, and timely manner and all reasonable efforts will be made to preserve confidentiality during the investigation.

If the report is not anonymous, the WPO or Whistleblowing Service will contact you to discuss the investigation process and any other matters that are relevant to the investigation. We will provide you with feedback on the progress and expected timeframes of the investigation. The person(s) against whom any allegations have been made will also be informed of the concerns and will be provided with an opportunity to respond.

Where you have chosen to remain anonymous, it is important that you check back with us on the status of your report.

Where you have asked us not to disclose your identity, it will not be disclosed to any other person, and we will conduct the investigation based on the information provided to us. We can still disclose the information contained in a report with or without your consent if:

- the information does not include your identity;
- all reasonable steps have been taken to reduce the risk that you will be identified from the information; and
- it is reasonably necessary for investigating the issues raised in the disclosure.

To the extent permitted by law, we will inform you and/or a person against whom allegations have been made of the findings.

### **Fair treatment**

The investigation process outlined in this Policy is also designed to allow fair treatment of any individuals mentioned in the disclosure. Investigations will follow a fair process, be conducted as quickly and efficiently as possible, and there will be a presumption of innocence until the outcome of the investigation is determined.

## 7. AFTER THE INVESTIGATION

We will notify you once an investigation has been completed but please be aware that we may be unable to disclose particular details or the outcome of the investigation. Any report will remain the property of Civilmart and will not be shared with you or any person(s) against whom the allegations have been made.

If you have a reasonable basis for being dissatisfied with how your disclosure has been investigated and administered, then you may escalate the matter to the Chief Executive Officer to request a review.