



OHS – 2.40

2.40 Whistle Blower Policy General

This is supporting policy and procedure for Whistleblower Protection

Policy Statement

Marathon Foods is committed to a culture of respect and ethical conduct in the way we work and relate to each other. This Policy supports our Employment Policies, Code of Conduct and Food Safety, and aligning to our values of Quality, Integrity, Unity, and Customer. Our values are core to our business and underpinning our commitment to fostering an inclusive organisation.

Whistleblowing is not about airing a grievance – it is about reporting a real or perceived wrongdoing. Our policy and our approach allows anonymous disclosure to allow all people to raise concerns regarding unethical, fraudulent, corrupt, unlawful, food safety or harassment, discrimination, victimisation or bullying conduct. It is strongly recommended that you read all the relevant policies to understand how your concern(s) relate to the Whistleblower policy.

Purpose

The purpose of this policy is to;

- provide you with an understanding of what is reportable conduct
• demonstrate the importance Marathon Foods places on ensuring a safe and supportive environment where our people feel confident to report concerns relating to the company, its employees, contractors, consultants and directors
• explain the processes for reporting concerns

Our Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns.

Scope & Applicability

This policy applies to anyone employed by Marathon Foods, whether full time, part time, fixed term or casual. This also includes contractors, consultants, and directors.

What is Reportable Conduct?

You may make a report under this policy if you have reasonable grounds to suspect that an Marathon Foods director, employee, contractor, supplier or other person may be engaging in conduct that is not in line with the company policies or values.

Reportable conduct is unbecoming behaviour that could put the business or its employees at risk.

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### What are my obligations?

Anyone making a report must:

- act in ‘good faith’
- have reasonable grounds for believing the information reported indicates a wrongdoing

If your report is not made in good faith or is found to be vexatious, malicious, deliberately misleading or frivolous, you may be prosecuted you may be subject to disciplinary action including dismissal.

No action will be taken where the report was made in good faith, but no wrongdoing was identified.

### Out of Scope – Complaints and Grievances

From time to time, you may have a complaint in relation to an employment-related grievance with another person within the organisation, which is not Reportable Conduct or a breach of the Organisation’s rules or policies. If you have a complaint about a grievance issue or you wish to raise a grievance issue, refer to the Marathon Foods Employment policies for more information.

### How do I report?

Whistleblowers are encouraged to report matters, preferably openly and in the following order:

1. In the first instance, to your manager.
  - a. Where this is not appropriate, or;
  - b. Where you do not feel comfortable doing so, or;
  - c. Where you have previously done so and no action has been taken, or;
  - d. Where you wish to remain anonymous, then;
2. To the company’s Protected Disclosure Officers as below

<b>Name and position</b>	<b>Location</b>	<b>Contact Details</b>
Ros Pizzica Head of People and Culture	Quality Assurance Offices	Office Tel: 03 9376 6160 Ros.Pizzica@marathonfi.com
Jenny Dardalis Chief Executive Officer	Front Offices	Office Tel: 03 9376 6160 Jenny.Dardalis@marathonfi.com

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3. To the company's external independent whistleblower agency  
<https://www.whistleblowingservice.com.au/marathon-foods/>

Any report by the whistleblower may at his or her request, be treated anonymously. The independent whistleblower agency is not associated with Marathon Foods in any way. They are trained and experienced specialists dedicated to dealing with whistleblowers and their concerns.

### How to make an online report

Marathon Foods has engaged an external, independent company to manage the Whistleblowing service (WBS). To make an online report using this service, please follow the steps below;

1. Head to <https://www.whistleblowingservice.com.au/marathon-foods/> or the QR Code below.



2. Select your language top right.
3. Click on the **Making a Report** button – middle of page.
4. Enter **Marathon** in the **Unique Key** field
5. Click on next and follow the prompt
6. Enter the Client Reference Number
7. Enter **Marathon2024** into the **Client Reference Number** field
8. For more information on WBS next steps, please refer to  
<https://www.whistleblowingservice.com.au/marathon-foods/>



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### Supporting resources

Below are resources that can be accessed for more information;

- Code of Conduct

### Related Documents

- Corporations Act 2001 (Cth)
- Australian Securities and Investments Commission Act 2001 (Cth)
- Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019
- Competition and Consumer Act 2010 (Cth)
- Food Safety Standards