

## Purpose

Nu-Pure Pty Ltd (Nu-Pure) is committed to maintaining a workplace that fosters a safety mindset and a collaborative and respectful environment, where behaviours are consistent with the Nu-Pure Code of Conduct and Respect at Work Policy. This document outlines how Nu-Pure employees can make a whistleblower report, the responsibilities of everyone to report improper conduct, and how individuals will be protected if a report is made.

This policy is designed to complement normal communication channels between management and employees. Employees are encouraged to continue to raise appropriate matters at any time with their direct managers.

## Scope

This policy relates to Nu-Pure and applies to all current and former employees.

## Policy

### 1. Understanding Whistleblowing

The term 'whistle blowing' refers to a person speaking up about an activity in the workplace which they believe violates ethical or legal practice. All managers and employees have a duty to report any evidence or suspicion of unethical conduct, unsafe practices, or misconduct, in a manner outlined by this policy. All genuine reports will be treated seriously and investigated in accordance with Nu-Pure's policies and procedures.

In dealing with whistleblowing reports, Nu-Pure has the following objectives:

- Physical and psychological safety of everyone involved is paramount.
- Procedural fairness for all parties involved.
- All employees have equal access to make a report.
- Achieve constructive outcomes from whistleblowing reports in the workplace.

Nu-Pure understands the moral dilemma that people are in when deciding whether to report an issue or not. Nu-Pure encourages everyone to consider the safety of themselves, their colleagues, and the business when feeling unsure about making a genuine report.

#### 1.1 Workplace Safety

The physical and psychological safety of all parties involved in whistleblowing is the priority for Nu-Pure and underpins the details of this document. If an employee feels at any time that they are being shut down, punished or humiliated for speaking up with questions, concerns or mistakes in the workplace, the employee needs to report this to the People and Performance department.

#### 1.2 Conduct that can be reported under this policy

Whistleblower reports can be made for behaviour or practices that relate to:

- theft, fraud or bribery,
- improper use of company funds,
- misleading or deceptive practices,
- dishonest conduct by an employee or person of association to Nu-Pure,
- improper or dishonest accounting or financial reporting,
- violations of Nu-Pure policies or procedures, in particular the Code of Conduct and Respect at Work policy
- undisclosed conflicts of interest
- matters of harassment, bullying, sexual harassment, discrimination, or victimisation
- violations of HACCP (Hazard Analysis and Critical Control Points)
- violations of GMP (Good Manufacturing Practice)
- violations of workplace health and safety policies, procedures and legislation
- other illegal activity or breaches of legal obligations, and/or
- other unethical or unsafe behaviour.

#### 1.3 Workplace Grievances

Reportable matters do not include personal workplace grievances. Personal workplace grievances include for example, but are not limited to, interpersonal conflicts between employees, work performance issues, or a decision relating to the engagement, transfer, or promotion of an employee. For matters relating to personal workplace grievances, refer to HR19 Grievance Policy and Procedure.



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## 2. How to submit a whistleblower report

Use normal channels for reporting concerns under the relevant Nu-Pure policies. This may include:

- Raise the issue with your supervisor or manager.
- Raise the issue with the People & Performance Department.

Where you cannot raise this issue or do not feel safe or comfortable to raise this issue with your supervisor or manager, or the People & Performance Department, then report the issue through a nominated third-party reporting platform with anonymity options.

Disclosures must be made in good faith, and on reasonable grounds. Reasonable grounds means that a reasonable person in the disclosures position would also suspect the information indicates misconduct or breach of the law.

### 2.1 Anonymous Whistleblower Reporting Platform

Nu-Pure has partnered with an external company, Whistle Blowing Services (WBS), as the nominated third-party whistleblowing reporting platform, with anonymity options. The purpose of a whistleblowing reporting provider is to provide a third-party platform to set-up secure and confidential channels for employees to submit whistleblowing reports in line with this policy.

### 2.2 How do I make an Online Report?

To make a report through WBS go to: <https://www.whistleblowingservice.com.au/nupure-beverages/>

On the landing page you'll find a "Making a Report" button. Click on this button and you will be redirected to a new page where you need to enter the below unique details. These details do not identify you individually, they only link the report to Nu-Pure Beverages.

**Unique Key = Nu-Pure**

**Client Reference Number = Beverages2025**

At the end of the report you have the option to provide your personal details. If you do provide your personal details, you can select one of the below options to confirm if you are willing to have your personal details shared with Nu-Pure but kept confidential to the extent reasonably able (Confidentiality), or if you want your personal details to be kept anonymous from Nu-Pure (Anonymity).

1. **Confidentiality** - I have elected to provide my name and/or contact details. I want my details to be kept confidential.
2. **Anonymity** - I want my disclosure to be anonymous, even where I have provided my name and/or contact details, I want to remain anonymous.
3. **Authority** - This disclosure is made on someone else's behalf. The information provided in this disclosure is based on information provided to me. I have recorded the information as provided to me.

## 3. How does Nu-Pure manage a whistleblower report?

Nu-Pure will consider the nature and substance of the report to determine the next appropriate steps. Nu-Pure will refer to HR30 Investigation and Disciplinary Policy and Procedure to conduct any required investigations of whistleblower reports. Following the company investigation and besides the action that Nu-Pure will take, the employee(s) involved may also be subject to criminal or civil action proceedings.

## 4. How is a whistleblower protected?

If a report is made through WBS, the employee has the option to keep their identity entirely anonymous. In this case, it is important to know there may be limitations to the investigation process and actions Nu-Pure can take, without being able to confirm all relevant details.

If a report is made through a Manager or the People & Performance Department, Nu-Pure will make every effort to ensure all disclosures are kept confidential and secure and will be properly investigated in accordance with this policy and HR30 Investigation and Disciplinary Policy and Procedure. Nu-Pure will consult with the whistleblower about whether they wish for their identity to remain confidential, or whether they consent to their identity being disclosed to investigators, internally or externally, for the purpose of assisting the investigation.

However, Nu-Pure may be required to reveal information provided to the extent necessary to permit a thorough and effective investigation or where required by law or court proceedings.



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## 4.1 Victimisation

Victimisation is subjecting or threatening to subject someone to a detriment because they have asserted their rights under legislation, made a complaint, or helped someone else make a complaint. It is also victimisation to threaten someone (such as a witness) who may be involved in an investigation. This treatment is unlawful and should be immediately reported using the Anonymous Whistleblower Reporting Platform (WBS).

## 5. Rights and Responsibilities

Nu-Pure expects all employees to maintain a high standard of professionalism, conduct, and work performance. Rights and responsibilities for all Nu-Pure employees include:

- Right to a safe working environment free from Bullying, Harassment & Discrimination.
- A duty to take reasonable care of your own health and safety, and not adversely affect the health and safety of yourself or others.
- Obligation to treat everyone with equality and respect.
- Right to speak up with concerns or mistakes in the workplace without feeling that they will be shut down, punished, or humiliated.
- Responsibility to use designated channels for reporting issues, whether through HACCP, leadership, People & Performance or the Anonymous Whistleblower Reporting Platform (WBS).
- Comply with and honestly participate in investigation and resolution processes.
- Comply with confidentiality and company policies.

### 5.1 Relevant Legislation

Nu-Pure and all employees are subject to relevant legislation applying to discrimination, harassment, sexual harassment, vilification, victimisation and bullying in the workplace. All parties to a whistleblowers report, grievance, and / or investigation must act in accordance with the law.

## 6. Breach of Policy

All employees are required to comply with this Whistleblowers Policy. A breach of this policy could result in disciplinary action being taken by Nu-Pure up to and including termination of employment. Any breach of confidentiality during and following the reporting and investigation process may lead to disciplinary action up to and including termination of employment.

## Related Documents

- HR17 Code of Conduct
- HR18 Respect at Work
- HR19 Grievance Policy and Procedure
- HR30 Investigation and Disciplinary Policy and Procedure

## Responsibility

Role	Responsibility
People & Performance Team	<ul style="list-style-type: none"> <li>• Drafting and updating the policy.</li> <li>• Issuing policy to all employees.</li> <li>• Ensuring access to policy for all employees.</li> </ul>
Directors	<ul style="list-style-type: none"> <li>• Policy approvers.</li> </ul>
People Managers	<ul style="list-style-type: none"> <li>• To ensure employees within their team understand this policy.</li> <li>• Raising non-compliance with the policy in a timely and respectful manner with the employee.</li> <li>• Report any ongoing non-compliance to the People &amp; Performance Team.</li> </ul>
All staff	<ul style="list-style-type: none"> <li>• It is the responsibility of all staff at Nu-Pure to adhere to and comply with this policy.</li> <li>• Ask direct management or the People &amp; Performance Team to clarify this policy to ensure understanding.</li> </ul>



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## Definitions

Term / Acronym	Definition
Reporter	A person who submits a whistleblower report.
Grievance	Workplace grievances are any real or perceived problem an employee experiences during employment. This can include the perception of discrimination, harassment, or any other unfair treatment or improper conduct.
Psychological Safety	Psychological safety is defined by a person's ability to feel that they won't be shut down, punished or humiliated for speaking up with ideas, questions, concerns or mistakes in the workplace.