

Whistleblower Policy & Procedure

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This is supporting policy and procedure for the **Information Security Policy** section “**Whistleblower Anonymous Fraud Reporting**”.

Policy Statement

Fandata Pty Ltd T/A Engine (Engine) 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 Information Security Policy (AUP)**, 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, unlawful or undesirable 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 Engine 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 Engine, 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 Engine 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.

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 vexacious, malicious, deliberately misleading or frivolous, you may be prosecuted under the Whistle Blowing Protection Authority and Acts and 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 Engine 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 Human Resource representative,
3. To the company's external independent whistleblower agency <https://www.whistleblowingservice.com.au/engine>

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

How to make an online report

Engine 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/engine>
2. Click on the **Make a Report** button
3. Enter **Engine** in the **Unique Key** field
4. Click on next and follow the prompt
5. Enter the Client Reference Number
6. Enter **Engine 2024** into the Client Reference Number field

For more information on WBS next steps, please refer to <https://www.whistleblowingservice.com.au/engine>

Supporting resources

Below are resources that can be accessed for more information;

- Code of Conduct
- Information Security Policy (AUP)
- Lifeline (131114) and Beyond Blue (1300 224 636)

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)
- CPS230 and CPS234 (APRA)

Review Cycle

This policy shall be reviewed on an annual basis.

Version Control

Version	Date	Description	Author	Approved By
1.0	19/3/2024	First Version	Monique Smoors	Scott Allen
2.0	11/04/2024	Second Version	Monique Smoors	Scott Allen
2.1	26/8/2025	Second Version – Annual Review	Monique Smoors	Neil Collyer