

Pensar is committed to fostering a culture of honesty, fairness and integrity. Pensar recognises the importance of ensuring a safe, supportive and confidential environment where people feel confident about reporting wrongdoing and are supported and protected throughout the process.

POLICY STATEMENTS

Pensar will:

- Encourage, support, and promote the appropriate raising of Reportable Conduct.
- Ensure individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported.
- Ensure disclosures are dealt with appropriately, confidentially and on a timely basis.
- Conduct fair, unbiased, evidence-based investigations in order to substantiate or refute claims of Reportable Conduct.
- Provide transparency around Pensar's framework for receiving, handling and investigating disclosures.

For the purposes of this policy, Reportable Conduct is defined as any past, present or expected future activity, behaviour or state of affairs reasonably considered to be:

- Illegal
- Unethical
- Improper
- An activity that could or will lead to unsafe work practices, environmental or health risks.
- A breach of any legislation or internal policy, including the Code of Conduct
- An intentional disclosure or misuse of commercially sensitive information
- Any other conduct, deliberate or otherwise, that may cause material financial or non-financial loss to Pensar or otherwise be materially detrimental to the interests of Pensar.
- In breach of the Corporations Act (2001) (the Corporations Act)
- Concealing reportable conduct

APPLICATION

The successful implementation and maintenance of our Whistleblower Policy relies on all personnel understanding and adhering to these practices and related procedures. Our management team are committed to demonstrating the high standard which is expected throughout the organisation.

The Senior Management Team is accountable for ensuring this policy is implemented.

This Policy applies to all personnel, sub-contractors and suppliers engaged in activities under our operational control.

This Policy will be reviewed every three (3) years.

Date: 3rd October 2024

Signed:



Patrick Newell
Chief Executive Officer