

ABO0019
Whistleblower Policy

Commтел Networks Solutions



Document Control

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1.0	-	Miles Hunnisett	30-Jun-2023	Initial document
1.0	-	Miles Hunnisett	01-Mar-2024	Inclusion of Whistleblower definition plus other edits. Addition of Evie as the HR GM.
1.0	-	Miles Hunnisett	07-May-2024	Inclusion of updated contact details
1.0	EA090, #473	Loyed F, Josh M	09-May-2024	Format correction, Generalize Legal Requirements

Distribution

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Company Information

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1 Scope

This Policy provides a framework to employees, contractors, suppliers, and other stakeholders of CommTel for reporting any concerns or wrongdoing related to the following matters:

- Any unethical business practices such as corruption, fraud and bribery;
- HR matters, including bullying, harassment and discrimination;
- Health, safety and environmental violations; and
- Modern slavery & other human rights violations; and

Under Australian law, individuals who report in good faith wrongdoing of the type described above may be described as Whistleblowers and may be protected by certain rights.

2 Purpose

Firstly, what does “Whistleblower” mean in the context of Australian law:

“A whistleblower is an individual who discloses information about misconduct, corruption, or illegal activities within an organization. Whistleblowers play a crucial role in exposing wrongdoing and promoting transparency and accountability. In Australia, there are laws and protections in place to encourage and safeguard whistleblowers who come forward with information about wrongdoing. These protections aim to prevent retaliation and ensure that whistleblowers are treated fairly, and their disclosures are investigated appropriately.”

Not all complaints and grievances attract Whistleblower protections provided by law. Personal work-related complaints or disputes such as salary disputes, interpersonal conflicts and promotion decisions are not protected, and are best raised directly with CommTel management.

By implementing this Whistleblower Policy, CommTel aims to foster a culture of transparency, integrity, and accountability, and encourages all individuals associated with the Company in any capacity to report concerns or wrongdoing without fear of reprisal. The policy aims to protect whistleblowers from any form of retaliation and ensure that all reported incidents are handled confidentially and appropriately, and where necessary, anonymously.

3 Policy

3.1. Reporting Mechanisms

Whistleblowers are encouraged to report their concerns through the following confidential reporting channels:

- **Internal Reporting:** Individuals who have concerns can report them to their immediate supervisor, the General Manager of Human Resources, or any senior management personnel. Supply chain concerns, or concerns regarding forced and child labour or instances of Modern Slavery can be reported to either the CommTel Commercial Manager, or the procurement team.
- **External Reporting:** Whistleblowers may also report their concerns to an external independent hotline, or a designated email address specifically established for whistleblowing purposes. Details of CommTel's external independent whistleblower service provider and contact details are provided in Section 4.

3.2. Protection and Non-Retaliation

CommTel strictly prohibits any form of retaliation against whistleblowers who report concerns in good faith. Retaliation includes but is not limited to termination, demotion, harassment, discrimination, or any adverse action against the whistleblower.

3.3. Confidentiality

All reports made under this policy will be treated with the utmost confidentiality to the extent it is practicable and permitted by law. The identity of the whistleblower will be protected, and information will only be disclosed on a need-to-know basis for the purpose of investigation and resolution.

3.4. Investigation and Resolution

Investigation Process - Upon receiving a report, CommTel will promptly initiate an investigation. The investigation will be conducted in a fair, objective, and unbiased manner by individuals with appropriate expertise.

3.5. Whistleblower Support

CommTel will provide appropriate support to whistleblowers throughout the investigation process, including regular updates on the progress of the investigation and protection against any potential retaliation.

3.6. Corrective Actions

If the investigation substantiates the reported concerns, CommTel will take appropriate corrective actions, which may include onward reporting to appropriate authorities, disciplinary measures, policy changes, training programs, or any other necessary steps to address the issue.

3.7. Record Keeping

CommTel will maintain accurate records of all whistleblower reports, investigations, and actions taken in response to the reports. These records will be securely stored and retained in accordance with applicable laws and regulations.

3.8. Training and Awareness

CommTel will provide regular training and awareness programs to employees and other relevant stakeholders to ensure they understand their rights and obligations under this Whistleblower Policy.

3.9. Communication and Availability

This policy will be communicated to all employees, contractors, suppliers, and other relevant stakeholders. It will be easily available on the company's intranet and externally facing website.

3.10. Responsibility for the Policy

The Directors of CommTel have approved this Policy and are responsible, together with CommTel senior management for ensuring the Policy is implemented. The Policy will be periodically reviewed and updated as necessary to ensure its effectiveness and compliance with any changes in laws or regulations.

If you have any questions regarding this Policy, please contact the CommTel HR GM:
 E-Mail: EvieH@commtelns.com
 Tel: +61 3 8340 6100

3.11. Legislation, Codes of Practice & Associated CommTel Policies

By implementing this Whistleblower policy, CommTel confirms its commitment to adhere to all relevant and latest Acts, Guidelines, and Codes of Practice issued by federal and state governments. Additionally, CommTel will ensure compliance with other related policies concerning Human Rights, Labour Standards, Code of Conduct, EEO, Discrimination, Harassment, Bullying, and Anti-Corruption.

4 Further Information

If you don't feel able to raise grievances, concerns and complaints on these subjects directly or in person, you may do so anonymously through CommTel's third party Whistleblower partner **'StopLine'**. Someone will deal with your call or enquiry professionally and in person. Confidentiality will be assured. Your case will be followed up and you will be Informed on progress as the case is investigated.

Hotline phone number: **1300 30 45 50** (or if calling from overseas, **+61 3 9811 3275**)

Website: <https://commtelns.stoplireport.com/>

Email: makeareport@stoline.com.au



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