

Whistleblower Policy

1. Purpose

Junction Australia (Junction) has a strong interest in knowing how its business is being conducted, and the people best-placed to keep Junction properly informed are the people that work in and around the organisation.

This allows Junction to encourage positive and efficient conduct that aligns with the Junction's values and enhances its reputation. It also allows Junction to identify and where necessary correct negative, unethical or undesirable conduct that has the potential to impact on Junction's operations and reputation.

The right person in the right place and at the right time may see or hear when there has been conduct which may be of concern to Junction. Without a complete report of that conduct being directed to a responsible manager in a timely way, Junction's ability to respond to issues of concern is affected.

This policy encourages reporting of instances of suspected unethical, illegal, fraudulent or undesirable conduct involving Junction's operations. It identifies how a report can be effectively made, and the protections and measures that provide those persons who make a report with confidence they can do so confidentially and without fear of reprisal.

This policy provides a framework for reporting. It does not define what particular action by Junction will follow a report of suspicious conduct. The circumstances of each report will be different, and Junction will approach each issue on a case-by-case basis, and in a way that Junction is satisfied upholds responsible governance and corporate behaviour.

Subject to the mandatory Corporations Act provisions affecting whistleblowers, this policy directs staff in relation to reporting (and handling reports) of negative, unethical or undesirable conduct, and a failure to follow the directions in this policy may lead to employment consequences. The terms of this policy are not incorporated into any individual employment contracts, and may be amended or updated by Junction from time to time.

2. Scope

This policy applies across Junction Australia (Junction) and to Junction clients and their families.

3. Policy Statement

Junction is committed to operating legally (in accordance with applicable legislation and regulation), properly (in accordance with organisational policy and procedures), and ethically (in accordance with recognised ethical principles). Board Directors and staff are expected to cooperate with the organisation in maintaining legal, proper, and ethical operations, if necessary by reporting non-compliant actions taken by other people. Correspondingly, staff who do assist in maintaining legal, proper and ethical operations should not be penalised in any way.

4. Definitions

Please refer to Junction's glossary of terms for policies and procedures. Terms and definitions identified below are specific Junction, this policy and critical to its effectiveness.

Eligible Whistleblower includes an individual who is, or has been:

- An officer;
- An employee;
- An individual who supplies goods or services and an employee of a person that supplies goods or services;

- An associate;
- A relative or dependant of an individual (or of such an individual's spouse) referred to above.

Eligible Recipient includes:

- An officer or senior manager;
- An auditor or member of an audit team conducting an audit;
- An actuary;
- A person authorised by Junction to receive disclosures;
- ASIC or APRA.

Protected disclosure includes a disclosure of information by an eligible whistleblower to an eligible recipient in relation to Junction and the eligible whistleblower has reasonable grounds to suspect that the information concerns misconduct, or an improper state of affairs or circumstances, in relation to Junction.

Whistleblower Protection Officers refer Schedule.

5. Disclosable Conduct

Reasonable grounds are objective facts which would lead a reasonable person to think there is a real possibility of the misconduct occurring.

If you have reasonable grounds to suspect that a Junction director, officer, employee, contractor, supplier, tenderer or other person who has business dealings with Junction has engaged in conduct in relation to Junction that:

- 5.1. is dishonest, fraudulent or corrupt, including bribery;
- 5.2. is illegal activity (such as theft, violence, harassment or intimidation, criminal damage to property or other breaches of state or federal law);
- 5.3. is unethical (such as dishonestly altering company records or data, adopting non-standard or unjustified accounting practices);
- 5.4. involves breaching Junction's policies or procedures, including policies and procedures relating to safety at work;
- 5.5. is potentially damaging to Junction, a worker or third party, such as unsafe work practices, environmental damage, health risks or abuse of Junction's property or resources;
- 5.6. may cause financial loss to Junction or damage its reputation or be otherwise detrimental to its interests;
- 5.7. involves harassment, discrimination, victimisation or bullying (but not including reasonable management action undertaken in a reasonable manner); or
- 5.8. involves any other kind of misconduct or an improper state of affairs or circumstances (including the existence of a serious conflict of interest between Junction's affairs and an individual's personal interests, or the exercise of corporate authority for personal ends).

6. What is not Disclosable Conduct?

Conduct which is not related to the affairs of Junction (and is purely private in nature) is not a reportable matter. Some out-of-hours conduct may still be related to the affairs of Junction if it is conduct which is capable of seriously impacting on Junction's reputation, standing or finances.

Conduct which is a "personal work-related grievance" as defined in the Corporations Act is not a reportable matter under this policy (unless it also has significant implications for Junction unrelated to the discloser, or is otherwise a significant offence against federal or state law). A personal work-related grievance may include:

- 6.1. an interpersonal conflict between the discloser and another employee;

- 6.2. a decision relating to the engagement, transfer or promotion of the discloser;
- 6.3. a decision relating to the terms and conditions of engagement of the discloser;
- 6.4. a decision to suspend or terminate the engagement of the discloser, or otherwise to discipline the discloser.

However, a personal work-related grievance can be raised through the Junction Grievance Policy.

7. How do I report Disclosable Conduct?

There are several options for making a report if you become aware of any issue or behaviour which you have reasonable grounds to suspect is Disclosable Conduct.

For the purposes of this policy to ensure appropriate escalation and timely investigation, we request that reports are made to any of the Whistleblower Protection Officers.

Junction has also established a Whistleblower Complaint Form which can be accessed on the Junction Website.

Reports may be posted to the Whistleblower Protection Officer, C/- 168 Greenhill Road, Parkside SA 5063 and marked "Private & Confidential".

You may also raise the matter with an "officer" or "senior manager" of the organisation. This includes a director, or a senior manager in the organisation who makes, or participates in making, decisions that affect the whole, or a substantial part, of the business of Junction, or who has the capacity to affect significantly Junction's financial standing.

8. What information should I include in my report?

A description of the suspected conduct.

A description of the reasonable grounds for the suspicion that the conduct is Disclosable Conduct.

Anything else you wish to add that would assist Junction to make an assessment of the conduct or to otherwise investigate it. Evidence to support such concerns should be brought forward at this time if it exists. The absence of such evidence will be taken into account in subsequent consideration of whether to open an investigation into the matter. However, absence of such evidence is not an absolute bar to an investigation being undertaken.

9. What will happen once I have made a report?

Junction will assess each occasion of Disclosable Conduct, and subject to that assessment will take steps to investigate as soon as reasonably practicable. A person to whom a report has been made may, if appropriate, appoint an internal or external person to assist in any investigation. Feedback on the course of the investigation and its outcome will be provided to you (subject to any appropriate privacy considerations and/or to agreement that the feedback will remain confidential).

You should keep in mind that Junction may have or obtain additional detail about the Disclosable Conduct (whether through an investigation through other means), and will approach the resolution of an issue on the basis of what is reasonably necessary to ensure appropriate responsible governance and corporate behaviour.

The extent and nature of the investigation process undertaken will be determined on a case-by-case basis according to the nature of the Disclosable Conduct. If the report made is not anonymous, a person with responsibility for conducting an investigation will in most cases contact you to discuss the investigation process.

Junction will not conduct an investigation under this policy if the Disclosable Conduct relates to a matter already investigated, or if it is not Disclosable Conduct such as a personal work-related grievance.

10. Protection of Whistleblowers

Junction is committed to ensuring confidentiality in respect of matters raised under this policy, and that those who make a report are treated fairly and do not suffer detriment.

11. Protection against detrimental conduct

Detrimental treatment includes dismissal, demotion, harassment, discrimination, disciplinary action, bias, threats or other unfavourable treatment connected with making a report.

If you are subjected to detrimental treatment as a result of making a report under this policy you should:

- 11.1. Inform a Whistleblower Protection Officer, officer or senior manager within your relevant division immediately under the whistleblower policy; or
- 11.2. raise it in accordance with part 7 of this policy.

12. Protection of your identity and confidentiality

Subject to compliance with legal requirements, upon receiving a report under this policy, Junction will only share your identity as a whistleblower or information likely to reveal your identity if:

- 12.1. you consent;
- 12.2. the concern is reported to the Australian Securities and Investments Commission ("ASIC"), the Australian Prudential Regulation Authority ("APRA"), the Tax Commissioner or the Australian Federal Police ("AFP"); or
- 12.3. the concern is raised with a lawyer for the purpose of obtaining legal advice or representation.

If Junction needs to investigate a report, it may disclose information that could lead to your identification, but it will take reasonable steps to reduce this risk.

Any disclosures of your identity or information likely to reveal your identity will be made on a strictly confidential basis.

13. Reporting to the Independent Commissioner against Corruption (ICAC)

Where an employee is performing contract work for a public authority or the Crown the person is deemed to be a 'public officer' and as such is required to report to the Office of Public Integrity matters that are reasonably suspected to involve corruption, misconduct and/or maladministration as per the Directions and Guidelines for Public Officers.

14. Protection of files and records

All files and records created from an investigation will be retained securely.

Unauthorised release of information to someone not involved in the investigation (other than senior managers or directors who need to know to take appropriate action, or for corporate governance purposes) without your consent as a whistleblower will be a breach of this policy.

A release of information in breach of this policy will be regarded as a serious matter and may have consequences for employment.

15. Availability of policy

This policy will be published on both the Junction intranet and external website and provided to all new staff on commencement.

16. Related Documents

- Staff Code of Conduct Policy
- Grievance Policy

- ICAC Directions and Guidelines for Public Officers
- Fraud Prevention Policy
- Procurement Policy

17. Schedules

This policy must be read in conjunction with its subordinate schedules as provided in the table below.

18. Policy Information

Parent Policy or Procedure	
Document Owner	Board
Policy Stream	Governance
Subordinate Procedures	
Subordinate Schedules	Whistleblower Protection Officers Schedule
Review Date	Approved date plus 3 years
Relevant Legislation	<ul style="list-style-type: none"> • Corporations Act 2001 (Cth) • Independent Commissioner Against Corruption Act 2012 (SA) • Fair Work Act 2009 (Cth) • Work Health & Safety Act 2012 (SA)
Approved Date	21/08/2019
Review Date	21/08/2022