

Whistleblower Protection Policy

Overview

The Whistleblower Protection Policy (the Policy) is one of a number of Policies and Codes that promotes a culture of compliance, honesty and ethical behaviour within the Securecorp Group.

In line with Securecorp's mission of Reliability, Integrity and Results, Securecorp's aim is to encourage employees, contractors, and representatives to report any wrongdoing in good faith and in an environment free from victimisation so that the Board and Senior Management can adequately manage risk and culture issues within Securecorp.

Commitment

Securecorp's Senior Management encourages all employees, contractors, and representatives to report wrongdoing. Securecorp's attitude is "when in doubt report". All employees, contractors and representatives should feel confident and comfortable about reporting wrongdoing.

Securecorp's Senior Management is committed to protecting and supporting the dignity, well-being, career, and good name of anyone reporting wrongdoing.

Definitions

Word	Definition
Worker	Securecorp employees, contractors and representatives
Policy	Documented, deliberate system of principles to guide. Decisions and achieve rational outcomes
Procedure	Process of implementing policy directives

Scope

The Policy applies to all employees, contractors, and representatives of the Company in all businesses and subsidiaries and at all locations within the Group.

It sets out the minimum requirements for the Securecorp Group. Where Securecorp operates in another jurisdiction (e.g.: overseas, different States) and that jurisdiction imposes a higher standard, those local standards are deemed to be incorporated into and to supplement the Policy.

Reporting wrongdoing

Employees, contractors, and representatives can report wrongdoing in two ways:

1. Direct Line of Management
2. Executive Access

Direct Line of Management

Depending on the nature of the wrongdoing, the individual is encouraged to first discuss their concern with their Manager.

Any Securecorp team member that submits or receives a report must treat the matter confidentially.

If the individual making the report does not feel comfortable speaking with their Manager, they can raise a wrongdoing with the support area within Securecorp relevant to their concern:

Type of Concern	Support Area
Fraud or Financial Crime	Finance Director
Staff or people matters	Senior People and Culture Manager
Compliance	State General Manager
Health and Safety issues	State General Manager

Reports of wrongdoing raised through these channels may be investigated using processes within the Securecorp Group's EEO Discrimination, Harassment & Bullying Policy or any State or Federal Act or Regulation that is fit for purpose.

A person reporting wrongdoing via these channels can be assured they will be protected, and that the investigation will be conducted in accordance with Securecorp's values of Reliability, Integrity and Results, as well as under the principles of fairness and natural justice.

The Policy does not prevent a person from reporting wrongdoing to a regulator under an applicable law or prudential standard.

Executive Access

The Securecorp Group also recognises that an individual may prefer to bypass their Direct Line of Management in certain circumstances, including but not limited to the following:

- they believe that they may be victimised if they use a normal reporting channel; or
- they prefer to make the report anonymously.

To ensure these individuals can raise a wrongdoing, Securecorp fosters direct access to Executive Management via Executive Access. Executive Access operates via the designated email address

feedback@Securecorp.com.au which is monitored directly by Executive Management where wrongdoing can be reported on an individual or anonymous basis.

Investigating wrongdoing

Investigations of wrongdoing will be conducted in a manner that is confidential, fair and objective. The investigations process will vary depending on the nature of the wrongdoing and the amount of information provided.

For a report to be investigated, it must contain sufficient information to form a reasonable basis for investigation. An individual reporting anonymously, via Executive Access, should provide as much information as possible so as not to compromise the ability to fully investigate the report.

A Whistleblower will always be informed of the outcome of the investigation. In cases where the Whistleblower Investigator has not substantiated the allegations, an appropriate explanation will be made to the Whistleblower, subject to any privacy and confidentiality rights.

Whistleblower Protection Officer (WPO)

Securecorp's Policy provides for the appointment of the Whistleblower Protection Officer (WPO). The WPO is responsible for protecting the Whistleblower from being victimised as a result of making a report. Securecorp has two Whistleblower Protection Officers, our Finance Director and Senior People and Culture Manager.

Any individual reporting wrongdoing can seek advice from the Whistleblower Protection Officer prior to or after making a report.

The Whistleblower Protection Officer can protect the Whistleblower in a number of ways including, but not limited to the following:

- Ensuring confidentiality in the investigation.
- Protection, as far as legally possible, the individual's identity.
- Offering the employee, contractors and representatives leave of absence while a matter is investigated.
- Relocating the employee, contractor or representative to a different work group or department (where possible).

Reporting and Governance

The Securecorp Executive Management Team, or a subset thereof (if appropriate), reviews the reports submitted through Executive Access and the investigation results.

This Policy is reviewed regularly and whenever there is significant regulatory changes or business needs. A breach of the Policy may, in some circumstances, may result in disciplinary action or even immediate termination.

Approved by: Managing Director