



# WHISTLEBLOWER POLICY

## Introduction

This document sets out the Whistleblower Policy to be followed by all FINSIA employees, Board of Directors, committees, council members and all persons working for and on behalf of FINSIA - referred to as employees throughout this Policy.

FINSIA must comply with the corporate sector whistleblower protection regime in Part 9.4AAA of the Corporations Act 2001, which was introduced in July 2019. This Whistleblower Policy explains how we ensure that Whistleblower rights are protected under the new regime.

We are committed to maintaining a culture where all employees are encouraged to raise concerns about poor or unacceptable practice and misconduct. The purpose of this policy is to ensure that employees are able to lodge any concerns that you may have and know that these issues will be fully investigated and dealt with appropriately.

In line with the FINSIA Employee Code of Conduct, the organisation is committed to offering complete confidentiality to any employee who may wish to raise a concern as long as the employee is acting in good faith and in accordance with this policy.

We are committed to protecting and supporting the confidentiality, reputation and health and well-being of all employees and will ensure that you will not suffer any ramifications as a result of reporting a matter under this policy.

## Examples of Reportable Conduct

You may make a report under this policy if you believe that employees and persons working for and on behalf of FINSIA has engaged in conduct (**Reportable Conduct**) which:

- Is fraudulent, illegal, dishonest, deceitful and/or corrupt
- Breaches regulations or laws
- Breaches FINSIA policies and procedures
- Involves improper behaviour relating to financial matters and reputation
- Involves mismanagement of resources
- Involves an unsafe work practice
- Involves harassment, discrimination, victimisation or bullying
- Involves any other kind of serious improper conduct

## Who to Report the Matter to

If you consider that an issue or behaviour falls under Reportable Conduct as listed above.

- In the first instance and if appropriate, the matter should be reported to Jo Becker, Head of People & Culture at [j.becker@finsia.com](mailto:j.becker@finsia.com)
- If this is not possible or if you don't feel comfortable with this approach then the matter should be reported to the Whistleblower Officer.

- If the matter relates to the CEO or a member of the leadership team then it should be reported to FINSIA's Whistleblower Officer.
- FINSIA's Whistleblower Officer is Alan Bardwell, the Chair of AFRMC, and he can be contacted by email at: [whistleblowerofficer@finsia.com](mailto:whistleblowerofficer@finsia.com)
- A matter may be reported anonymously if you prefer by posting the document marked private and confidential to the Whistleblower Officer by using the address below:

FINSIA  
PO Box H99, Australia Square, NSW 1215

## **Whistleblower and the Grievance Procedure**

The Whistleblower Policy should not be confused with the Grievance Procedure – this procedure covers an employee's personal situation. The Whistleblower Policy is primarily concerned with where the interests of others or of this organisation itself are at risk.

## **Investigation of Reportable Conduct**

FINSIA will investigate all matters reported under this policy as soon as possible. The matter will be examined and then an assessment of the situation will dictate what action should be taken.

This may take the form of an internal enquiry or a more formal investigation. Depending on the matter and the circumstances, the Whistleblower Officer may appoint a person to assist with the investigation (with your consent). You will be told who is handling the matter, how you can contact him/her and whether any further assistance may be needed.

If you have any personal interest in the matter, this should be declared at the outset.

The investigation will be conducted in an objective and fair manner having regard to all aspects of the Reportable Conduct.

## **Whistleblower Rights and Protections**

Whistleblowers play an important role in identifying and calling out misconduct and harm to consumers and the community. FINSIA encourages Whistleblowers to come forward with their concerns.

We do not tolerate harassment, victimisation, intimidation, damage to your reputation or psychological harm to you as a result of being a Whistleblower from any member of staff. This applies to all employees under the Whistleblower Policy.

If an employee requests for their identity to be protected, all reasonable steps will be followed to prevent the employee's identity being revealed.

Should a situation arise where it is not practicable to resolve the matter without revealing the employee's identity (e.g. if the employee's evidence is needed in a court of law), the issue will be discussed with the employee.

All files and records created from the investigation will be kept under strict confidentiality guidelines. Unauthorised release of information to someone not involved in the investigation is a serious breach of this policy.

The Whistleblower Officer (and others assisting the investigation) can protect you in a number of ways:

- Ensuring confidentiality during the investigation
- Protecting your identity (as far as legally possible)
- Offering leave and or contact of our EAP services
- Transferring you to another team (if appropriate)

### **Matters Raised Maliciously**

Any employee who maliciously raises a matter that they know to be untrue will be investigated which might result in disciplinary action.

### **Outcomes**

Where appropriate, FINSIA will provide feedback of the progress and outcome of the investigation however, this may not be possible where a Whistleblower has reported a matter anonymously.

### **Employee Assistance Program (EAP)**

We have contracted Benestar (formally Davidson Trahaire Corpsych) to provide our Employee Assistance Program. At any stage during the investigation, you may feel that you need to contact our EAP service for a confidential chat, the telephone number to contact is 1300 360 364.

### **Related Documents**

- Grievance Policy
- Employee Code of Conduct
- Bullying, Harassment, Discrimination Prevention Policy
- Corporations Act 2001

### **Policy Version Control**

<b><i>Version Number</i></b>	<b><i>Developed/Updated</i></b>	<b><i>Due to be updated</i></b>
Version 1	Developed in November 2011	
Version 2	Updated October 2017	
Version 3	Updated July 2019	
Version 4	Revised contact details April 2023	July 2023