

Scope

Applies to the board and all workers.

Purpose

The purpose of this policy is to:

- a) encourage the reporting of matters that may cause harm to consumers in the community or financial/non-financial loss to the Company or damage to its reputation;
- b) enable the Company to deal with reports from whistleblowers in a way that will protect the identity of the whistleblower as far as possible and provide for the secure storage of the information provided;
- c) establish policies for protecting whistleblowers against reprisal by any person internal or external to the entity;
- d) provide for the appropriate infrastructure;
- e) help to ensure the Company maintains the highest standards of ethical behaviour and integrity.

Policy Statement *[Document updated in Rebrand. Policy Statement absent.]*

Definitions

Company	means GP down south Ltd T/A Oseca.
Workers	defined as all employees and contractors.

Responsibilities

The Board of Oseca 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).

Workers are expected to cooperate with the organisation in maintaining legal, proper, and ethical operations, if necessary by reporting non-compliant actions by other people. Correspondingly, workers who do assist in maintaining legal, proper, and ethical operations should not be penalised in any way.

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Details

Concerns regarding illegal or corrupt behaviour

Where a worker of the Company believes in good faith on reasonable grounds that any other worker has breached any provision of the general law, that employee is encouraged to report their concern to:

- their Manager: or, if they feel that their Manager may be complicit in the breach,
- the CEO: or, if they feel that the CEO may be complicit in the breach,
- a member of the Board, or
- the duly constituted authorities responsible for the enforcement of the law in the relevant area.

The person making their concern known shall not suffer any sanctions from the Company on account of their actions in this regard provided that their actions are in good faith, are based on reasonable grounds, and conform to the designated procedures.

Any person within the Company to whom such a disclosure is made shall:

- if they believe the behaviour complained of to be unquestionably trivial or fanciful, dismiss the allegation and notify the person making the allegation of their decision;
- if they believe the behaviour complained of to be neither trivial nor fanciful, ensure that the allegation is investigated, a finding is made, and the person making the allegation is informed of the finding.

Any such investigation shall observe the rules of natural justice and the provisions of procedural fairness.

Disclosures may be made anonymously, and this anonymity shall as far as possible be preserved by the organisation.

Concerns regarding improper or unethical behaviour

Where a worker member of the Company believes in good faith on reasonable grounds that any other worker has breached any provision of the Company’s Constitution, bylaws, policies, code of conduct, or generally recognised principles of ethics, that worker may report their concern to:

- their Manager: or, if they feel that their Manager may be complicit in the breach,
- the CEO: or, if they feel that the CEO may be complicit in the breach,
- a member of the Board.

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References

Corporations Act 2001 (whistleblower protections)
ASIC Whistleblower Resources
Whistleblowing At Your Not-For Profit (A Leaders Guide)
www.communitydirectors.com.au

Legislation & Compliance

This policy has been developed and will be reviewed on a three-yearly cycle. All content will be updated to ensure it is compliant with relevant legislation, standards, rules and guidance.

Related Legislation and Organisational Documents

DOCUMENTATION:

Policies:

Work Instructions:

Forms:

Other:

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