

Policy Statement

Acting ethically and with integrity is core to what we stand for, so we encourage you to act if you have concerns about illegal, unethical or improper conduct.

The purpose of this policy is to encourage the reporting of any suspected fraudulent, corrupt or inappropriate behaviour. At times, it may be inappropriate or difficult to raise concerns through the normal channels of line management. This policy provides an avenue to express concerns in a manner that protects a person's identity.

A Whistleblower is an employee or contractor of SPC who wishes to report conduct that they believe is in breach of SPC's *Code of Conduct* or the law, where they feel a need for protection against reprisal for having made a report.

Scope

The protection of this policy applies to all full time, part time, seasonal, fixed term and casual employees. It also applies to SPC's contractors.

What to report

Actions that are fraudulent, corrupt, inappropriate or illegal that involve the business or its employees/contractors.

Who to report it to

Warren Brandt
warren@the8s.com.au

Investigation

The investigating officer will ensure all reports are investigated appropriately and assume no guilt of any party until proven otherwise.

Feedback

The Whistleblower will receive feedback on the progress of the investigation and whether anything has come to light that

Confidentiality and Cooperation

All information received will be held in strictest confidence, and if desired by the individual, the identity of the Whistleblower will not be disclosed without permission.

If approached as part of a whistleblowing investigation, all employees and contractors are required to provide assistance in a discrete and timely manner and maintain confidentiality and security.

Protection

SPC is committed to ensuring that individuals are not disadvantaged from validly raising concerns about suspected reportable behaviour. Disadvantage is considered to be dismissal, demotion, harassment, discrimination or bias.

If there are concerns for the safety of a Whistleblower, he or she may request leave of absence or a temporary change of workplace. These requests will be given appropriate consideration.

Penalties for Breaching this Policy

Where an employee or contractor of SPC breaches this policy, they will face disciplinary action. In serious cases this may include termination of employment or supplier contract. For further information, please refer to SPC's *Disciplinary Policy*.

If the law has been broken, the individual may also be personally liable.

Related Policies

- Code of Conduct Policy
- Disciplinary Policy

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