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Contact	Company Secretary



Whistleblower Policy

POLICY STATEMENT

Who does this policy apply to?	This Policy applies to all staff of Meat & Livestock Australia Limited (MLA) and its subsidiaries, MLA Donor Company Limited and Integrity Systems Company Limited (MLA Group) and MLA Group's stakeholders and workforce, including Directors, management, employees, agents and contractors.
Key Definitions	<p>ACNC means the Australian Charities and Not-for-Profits Commission.</p> <p>APRA means the Australian Prudential Regulation Authority.</p> <p>ASIC means the Australian Securities and Investments Commission.</p> <p>ATO means the Australian Tax Office.</p> <p>Code of Conduct means MLA Group's Code of Conduct.</p> <p>Corporations Act means the <i>Corporations Act 2001</i> (Cth).</p> <p>Eligible Recipient has the same meaning as set out in this policy.</p> <p>Eligible Whistleblower has the same meaning as set out in this policy.</p> <p>Emergency Disclosure has the same meaning as set out in this policy.</p> <p>Personal Work-Related Grievance has the same meaning as set out in this policy.</p> <p>Protected Disclosure has the same meaning as set out in this policy.</p> <p>Public Interest Disclosure has the same meaning as set out in this policy.</p> <p>Staff means directors, employees, contractors and employees of contractors of MLA Group.</p> <p>Whistleblower Laws means the <i>Corporations Act 2001</i> (Cth) and <i>Taxation Administration Act 1953</i> (Cth).</p>
Policy statement	<p>This policy documents the commitment of the Board and senior management of MLA Group to maintaining an open working environment in which directors, employees, contractors and employees of contractors (Staff) observe high standards of business and personal ethics in the conduct of their duties and responsibilities.</p> <p>This Whistleblower Policy (Policy) encourages Staff to raise or report concerns confidentially and/or anonymously if they wish.</p> <p>The Policy also sets out a summary of the protections that are available to individuals who make disclosures under the whistleblower protection provisions</p>

	<p>provided in the <i>Corporations Act 2001</i> (Cth) (Corporations Act) and the <i>Taxation Administration Act 1953</i> (Cth) (Whistleblower Laws). Under the Whistleblower Laws, an 'Eligible Whistleblower' will be entitled to certain legal protections if they make a 'Protected Disclosure' to:</p> <ul style="list-style-type: none"> • an 'Eligible Recipient', or the ATO (where the misconduct relates to tax); or • a legal practitioner for the purpose of obtaining legal advice in relation to the Whistleblower Laws. <p>The Policy summarises the meaning of some of those terms below.</p> <p>This Policy will be made available to all employees and officers upon commencement with the MLA Group during the induction process and will be available on an ongoing basis on the MLA Group intranet.</p>
Scope	<p>This Policy should be read in conjunction with the following MLA Group policies:</p> <ul style="list-style-type: none"> • Code of Conduct • Anti-Bribery and Corruption policy • Corporate Credit Card policy • Competition and Consumer Law policy • Competition and Consumer Guide for Staff • Procurement Policy • Social Media policy • EEO and Anti-Discrimination Policy • WHS Anti-Bullying and Harassment Policy • WHS System Manual • Delegation of Authority policy • Conflict of Interest Policy (Staff) <p>MLA Group's Code of Conduct (Code of Conduct) requires all MLA Group employees and representatives to practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.</p> <p>This Policy details the rights of MLA Group personnel to disclose improper conduct confidentially, anonymously, and on reasonable grounds without the fear of reprisal or detrimental action.</p> <p>MLA Group and its Code of Conduct encourages individuals to address their questions, concerns or complaints by initially discussing the matter with the Whistleblower Protection Officer (WPO), a General Manager, MLA Legal, the Company Secretary or if preferred, the Managing Director.</p> <p>However, to qualify for statutory protection, a report must be made via the designated eligible recipients identified below whose role it is to receive reports that qualify for protection under the Whistleblower Laws.</p>
Guidelines	
Who is an Eligible Whistleblower	Under the Whistleblower Laws, an ' Eligible Whistleblower ' includes an individual who is or has been:

	<ol style="list-style-type: none"> 1. an employee or officer (including a director) of MLA Group; 2. a supplier of goods or services (whether paid or unpaid) to MLA Group including an individual who is or has been employed or contracted by such a supplier or service provider; 3. an individual who is an associate of the MLA Group (as defined within the meaning of s10 to 17 of the Corporations Act); or 4. a relative or dependent (including a dependent of an individual's spouse) of an individual identified in 1 to 3.
Protected disclosure: What can a disclosure be made about?	<p>Under the Whistleblower Laws, a disclosure will be a 'Protected Disclosure' if it is a disclosure of information by an Eligible Whistleblower, where the Eligible Whistleblower has reasonable grounds to suspect that the information:</p> <ol style="list-style-type: none"> 1. concerns misconduct, or an improper state of affairs or circumstances, in relation to MLA or a related company; 2. concerns misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of MLA or an associate of MLA; or 3. indicates that an officer or employee of MLA or a related company, has engaged in conduct that: <ul style="list-style-type: none"> • constitutes an offence against, or a contravention of, a provision of specified legislation including the <i>Corporations Act 2001</i> (Cth), ASIC Act and other specified acts; • constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more; • represents a danger to the public or the financial system; or • if the Eligible Whistleblower makes a 'Public Interest Disclosure' or an 'Emergency Disclosure' (see definitions below). <p>Misconduct or an improper state of affairs or circumstances may include but not be limited to:</p> <ul style="list-style-type: none"> • A breach of the Code of Conduct; • A breach of MLA Group's approval practices and guidelines; • Unethical or improper conduct; • Financial malpractice, impropriety or fraud; • Contravention or suspected contravention of legal or regulatory provisions; • Auditing non-disclosure or manipulation of any audit processes; • Any deliberate concealment relating to the above; and/or • Modern slavery practices including within MLA Group's supply chain or business partners
To whom can disclosures under this Policy be made?	<p>Disclosures under this Policy and the Whistleblower Laws can be made to an 'Eligible Recipient', which includes:</p> <ol style="list-style-type: none"> 1. The WPO (HR Manager); 2. MLA's Chief Operating Officer or Company Secretary;

	<ol style="list-style-type: none"> 3. An auditor, a member of an audit team conducting an audit, or an actuary of MLA Group or a related company; 4. An actuary, a registered tax agent or BAS agent (as defined) of MLA Group or a related company; 5. A member of the Board of Directors of a company in the MLA Group; or 7. MLA Group's independent and confidential whistleblower service (STOPline), which is authorised by MLA Group to receive disclosures under the Whistleblower Laws; 8. ASIC; 9. APRA; <p>(each an "Eligible Recipient").</p> <p>Disclosures may also be made to the ACNC, or the ATO. However, it is important to note that disclosures to the ACNC will not be covered by the protections under the Whistleblower Laws. A whistleblower will only be covered by the whistleblower protections from the time they report to an Eligible Recipient.</p>
<p>Protected Disclosure: What is a public interest disclosure or an emergency disclosure?</p>	<p>A disclosure of information will also be a Protected Disclosure if the Eligible Whistleblower makes a 'Public Interest Disclosure' or an 'Emergency Disclosure' in accordance with the criteria listed below.</p> <p>A 'Public Interest Disclosure' means a public interest disclosure under the Whistleblower Laws, which must meet each of the following:</p> <ol style="list-style-type: none"> 1. the discloser has already made a Protected Disclosure to a regulatory body; 2. at least 90 days have passed since the Protected Disclosure was made; 3. the discloser does not have reasonable grounds to believe that action is being, or has been, taken to address the matters to which the previous disclosure related; 4. the discloser has reasonable grounds to believe that making a further disclosure of the information would be in the public interest; 5. at the end of the period in 2 (above), the discloser has given written notification to the regulatory body that includes sufficient information to identify the previous disclosure and states that they intend to make a public interest disclosure; 6. the public interest disclosure is made to a member of Federal or a State Parliament or a journalist (as defined under the Whistleblower Laws); and 7. the extent of the information disclosed in the public interest disclosure is no greater than is necessary to inform the journalist or member of parliament of the misconduct, improper state of affairs or other conduct that constituted the Protected Disclosure. <p>An 'Emergency Disclosure' means an emergency disclosure under the Whistleblower Laws, which must meet each of the following:</p> <ol style="list-style-type: none"> 1. the discloser has already made a Protected Disclosure to a regulatory body; 2. the discloser has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment;

	<ol style="list-style-type: none"> 3. the discloser has given a written notification to the regulatory body that includes sufficient information to identify the previous disclosure and states that the discloser intends to make an emergency disclosure; 4. the emergency disclosure is made to a member of Federal or a State Parliament or a journalist (as defined); and 5. the extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the journalist or member of parliament of the substantial and imminent danger.
What is a Personal Work-Related Grievance?	<p>A disclosure will not be a Protected Disclosure if the information disclosed concerns a 'Personal Work-Related Grievance' of the Eligible Whistleblower.</p> <p>A 'Personal Work-Related Grievance' is a grievance about any matter in relation to the Eligible Whistleblower's employment, or former employment, having (or tending to have) implications for the Eligible Whistleblower personally.</p> <p>However, the grievance will not be a Personal Work-Related Grievance if it has significant implications for the MLA Group and concerns conduct or alleged conduct referred within the definition of a Protected Disclosure or if the Work-Related Grievance concerns detrimental treatment or victimisation of the Eligible Whistleblower. These matters will be treated as a Protected Disclosure under the Whistleblower Laws.</p> <p>Examples of Personal Work-Related Grievances include:</p> <ul style="list-style-type: none"> • interpersonal conflict between the whistleblower and another employee; • decisions relating to the engagement, transfer or promotion of the whistleblower; • decisions relating to the terms and conditions of engagement of the whistleblower; and • decisions to suspend or terminate the engagement of the whistleblower, or otherwise to discipline the whistleblower.
What protection is available?	<p>The Whistleblower Laws provide certain protections for Eligible Whistleblowers who make a Protected Disclosure (including disclosures to both internal MLA Group Eligible Recipients and disclosures to external Eligible Recipients).</p> <p>Where the Staff member makes a disclosure on reasonable grounds, the MLA Group will act in the best interest of the Staff member to protect them from any victimisation, adverse reaction or intimidation and ensure they will not be disadvantaged in their employment or engagement with the MLA Group. An Eligible Whistleblower will also have specific protections under the Whistleblower Laws, which are outlined below.</p> <p>Please note that an Eligible Whistleblower can still qualify for protection even if the disclosure turns out to be incorrect.</p> <p>Anonymity and confidentiality</p> <p>The MLA Group will not disclose the identity of the Eligible Whistleblower or information that is likely to lead to the identification of the Eligible Whistleblower over the course of the investigation and after the investigation is finalised, unless:</p> <ul style="list-style-type: none"> • it discloses such information to an appropriate regulatory body or a member of the Australian Federal Police;

- it discloses such information to Commonwealth authority, or a State or Territory authority, for the purpose of assisting the authority in the performance of its functions or duties (including ASIC or APRA);
- it discloses such information to a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of the Whistleblower Laws;
- the disclosure of that information is made with the consent of the discloser; or
- it discloses information, but not including the identity of the Eligible Whistleblower, for the purposes of investigating the conduct disclosed and MLA takes all reasonable steps to reduce the risk that the Eligible Whistleblower will be identified as a result (see below).

The MLA Group requires that where an internal Eligible Recipient receives a Protected Disclosure, that person must not disclose the identity of the Eligible Whistleblower or information that is likely to lead to the identification of the Eligible Whistleblower unless one of the above exceptions applies or it is for the purposes of an investigation (see below).

Protection from Victimisation and Detriment

The MLA Group will take reasonable steps to prevent an Eligible Whistleblower from being victimised or suffering any detriment (whether threatened or actual) due to making or proposing to make a Protected Disclosure. This includes a detriment such as:

- in relation to an employee, dismissal, injury in his or her employment, alteration of position or duties to his or her detriment, discrimination between an employee and other employees of the same employer; or
- in relation to all Staff, harassment or intimidation, harm or injury, including psychological harm or damage to a person's property, reputation, business, financial position or any other damage.

Staff should be aware that under the Whistleblower Laws, the MLA Group has a responsibility to protect Eligible Whistleblowers from victimisation. The Whistleblower Laws also make it a criminal offence for an individual to threaten an Eligible Whistleblower or cause an Eligible Whistleblower to suffer detriment, and the individual may be required to pay a civil penalty and/or compensation to the Eligible Whistleblower. This includes where a Protected Disclosure had not actually been made, but that the would-be victimiser suspects that a Protected Disclosure may be made.

The MLA Group will also take all reasonable steps to ensure the fair treatment of employees who are mentioned in a Protected Disclosure by maintaining the confidentiality of information contained in any investigation report and investigating a Protected Disclosure in accordance with this Policy.

Where an Eligible Whistleblower is subject to, or concerned about, any victimisation or detriment as referred to the above, the Eligible Whistleblower should draw this negative treatment to the attention of the WWPO and the WPO will take action they deem appropriate in the circumstances.

Other Protections

An Eligible Whistleblower can also seek compensation and other remedies through the Courts if they suffer loss, damage or injury in specific circumstances. For

	<p>example, where the MLA Group failed to take reasonable precautions and exercise due diligence to prevent the detrimental treatment. In this case, independent legal advice should be sought or contact made with a regulatory authority as appropriate.</p> <p>Additionally, an Eligible Whistleblower may be protected from civil, criminal or administrative liability for making a Protected Disclosure, from contractual or other remedies on the basis of the Protected Disclosure and from the admissibility of information provided in evidence against the Eligible Whistleblower.</p>
<p>How to make a Protected Disclosure?</p> <p>See Annexure A – Whistleblower Process and Workflow</p>	<p>As per the above, the MLA Group has several internal channels for making a disclosure. An Eligible Whistleblower may:</p> <ul style="list-style-type: none"> • Make the disclosure to the WWPO who currently is the HR Manager; <ul style="list-style-type: none"> ○ Telephone: + 61 2 9463 9340 ○ Email: whistleblower@mla.com.au ○ Mail: Meat & Livestock Australia, Level 1, 40 Mount Street, NORTH SYDNEY NSW 2060 • Make a disclosure to a member of senior management or the Board or other MLA Eligible Recipient; or • Make a disclosure to STOPline (MLA Group's independent and confidential whistleblower service): <div data-bbox="609 985 1117 1200" data-label="Image"> </div> <ul style="list-style-type: none"> ○ Email: mla@stopline.com.au ○ On-line: mla.stoplinereport.com ○ Mail: Meat & Livestock Australia Limited c/o STOPline, Locked Bag 8, Hawthorn, Victoria Australia 3122 <p>Disclosures can be made anonymously, and all disclosures will be treated confidentially. There is no requirement for an Eligible Whistleblower to identify themselves to otherwise be eligible to receive the protections outlined under the Whistleblower Laws. If an Eligible Whistleblower wishes to remain anonymous, appropriate contact details should be provided to allow ongoing communication with the MLA Group.</p> <p>By making a disclosure to any of the above Eligible Recipients, the Eligible Whistleblower is taken to have consented to the details of the disclosure (including the Eligible Whistleblower's identity - unless they have elected to remain anonymous) being provided to the WPO and handled in accordance with this Policy.</p>
<p>Will disclosures be investigated?</p>	<p>The MLA Group will assess all disclosures of improper conduct made under this Policy as soon as possible after receipt of the disclosure to determine whether it is a Protected Disclosure which qualifies for protection, and whether a formal investigation is required. If it is determined no investigation is warranted, the Eligible Whistleblower will be informed as soon as possible.</p>

	<p>Where required, the investigation will be conducted in a timely, thorough, confidential, objective and impartial manner recognising the principles of natural justice and best practice investigative techniques.</p> <p>The WWPO is responsible for determining the scope of, and resources applied to, each investigation.</p> <p>How the investigation is undertaken, and the timeframe of the investigation will vary depending on the nature of the Protected Disclosure and the amount of information provided. The MLA Group may not be able to undertake an investigation if it is not able to contact the Eligible Whistleblower (for example, if an anonymous disclosure is made and no contact details provided).</p> <p>In the event the MLA Group undertakes an investigation, the Eligible Whistleblower will be provided with updates, where appropriate, about the investigation, including through anonymous channels of communication, during key stages, such as:</p> <ul style="list-style-type: none"> • when the investigation process has begun; • while the investigation is in progress; and • after the investigation has been finalised. <p>Specific details of the investigation, including outcomes, are unlikely to be appropriate to be shared to the Eligible Whistleblower, and information shared will be kept to a high level.</p> <p>Complainants, where possible, will be provided with feedback regarding the investigation's outcome. The MLA Group and the Eligible Recipient receiving a Protected Disclosure may need to disclose information in relation to a Protected Disclosure to undertake an investigation into the disclosure. However, information which may lead to the identity of the discloser will only be disclosed for the purposes of investigating the disclosure where the disclosure of that information is reasonably necessary for the purposes of investigating the conduct disclosed and all reasonable steps are taken to reduce the risk that the discloser will be identified as a result of disclosing that information.</p> <p>Unless consent is given by the person who makes a Protected Disclosure, their identity must not be disclosed during any investigation process.</p>
Responsibilities under this Policy	
Staff	<p>Staff must:</p> <ul style="list-style-type: none"> • When making a disclosure under this Policy ensure they have reasonable grounds on which to base the allegation(s). • Not victimise or cause a person to suffer detriment where a person makes or proposes to make a disclosure under this Policy.
Officers and Eligible Recipients	<p>Officers and Eligible Recipients specified in this Policy must:</p> <ul style="list-style-type: none"> • Ensure the appropriate consideration and confidentiality is applied to all disclosures under this Policy. • Promptly advise the WPO of any disclosure. If they receive a Protected Disclosure, ensure that they comply with their obligations under the Whistleblower Laws in relation to confidentiality of an Eligible Whistleblower's identity (as outlined in 'What protection is available' section above).

	<ul style="list-style-type: none"> • Not victimise or cause a person to suffer detriment where a person makes or proposes to make a disclosure under this Policy.
Whistleblower Protection Officer	<p>The WPO (HR Manager) is responsible for the administration of this Policy. The responsibilities also include:</p> <ul style="list-style-type: none"> • Receive all disclosures from Staff, management or the independent whistleblower service and acknowledge receipt with the complainant (if possible). • Determine whether a disclosure is a Protected Disclosure and whether a formal investigation is required. • Appropriately investigate Protected Disclosures. • Ensure that the MLA Group and its Staff comply with their obligations under the Whistleblower Laws. • Not victimise or cause a person to suffer detriment where a person makes or proposes to make a disclosure under this Policy. • Ensure the principles of natural justice are applied to the respondent(s) of any disclosure and investigation. • Report all disclosures to the Chair of the MLA Board and the Audit, Finance & Risk Committee and / or any of the following: Managing Director, Company Secretary, Chief Operating Officer or General Counsel (as appropriate) provided that they and the WPO ensure they comply with their obligations under the Whistleblower Laws in relation to confidentiality of an Eligible Whistleblower's identity (as outlined in 'What protection is available' section above). However, if the disclosure involves any of these individuals, the appropriate escalation process would occur. • Agree appropriate investigation processes and oversee the conduct of an investigation. • Provide an Investigation report to the Managing Director, the Chief Operating Officer and the Audit, Finance & Risk Committee or as directed by the Chairman (subject to escalation and the Whistleblower Laws, including in relation to confidentiality of an Eligible Whistleblower's identity). • Provide quarterly consolidated reports relating to disclosures to the Audit, Finance & Risk Committee, ensuring that confidentiality obligations under the Whistleblower Laws are complied with. • Review this Policy in conjunction with the Audit, Finance & Risk Committee. • Ensure that all Staff receive training on the operation of this Policy and the Whistleblower Laws.
Audit, Finance and Risk Committee	<p>The Audit, Finance and Risk Committee is responsible for:</p> <ul style="list-style-type: none"> • Receiving any notification and reports of disclosures as designated under this Policy. • Determining an appropriate response to the outcome of any investigation including issues involving accounting and auditing matters. • Taking appropriate corrective action when applicable.

	<ul style="list-style-type: none"> • On an annual basis prepare a consolidated report for the Board on all disclosures reported to the Audit, Finance & Risk Committee, showing outcomes and actions, ensuring that confidentiality obligations under the Whistleblower Laws are complied with. • Undertaking periodic reviews of this Policy. • Ensuring that the MLA Group and its Staff comply with their obligations under the Whistleblower Laws. • Ensuring that the Audit, Finance and Risk Committee complies with its obligations under the Whistleblower Laws in relation to the confidentiality of an Eligible Whistleblower's identity.
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Approval			
Version Number	Approved by:	Effective Date:	Unique ID Number:
V4	MLA Board	July 2021	LEG0007

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Annexure A

The following sets out the process and workflow (**see table 1.1 below**) for how a disclosure pursuant to MLA's Whistleblower Policy should be made and how it will then be responded to.

1. Confirmation of eligibility

Determine whether you are an Eligible Whistleblower (see the section '**Who is an Eligible Whistleblower?**' in the Whistleblower Policy).

2. Disclosure

If you determine you are an Eligible Whistleblower, you may make a disclosure to an Eligible Recipient. When making the disclosure, include the following:

- (a) Identify who and what your complaint is about - is it a Protected Disclosure (see the definition for **Protected Disclosures** in the Whistleblower Policy)?
- (b) Describe the disclosable conduct – consider:
 - Who was involved in the conduct?
 - What was the conduct?
 - When and where did the conduct occur?
 - Why do you think the conduct is the kind subject to a Protected Disclosure?
 - How do you know about the conduct?
- (c) Identify and provide any evidence you have to support your disclosure.
- (d) Identify any witnesses and provide their name(s) and contact details (if possible) so they may be contacted about the conduct.
- (e) Include any other relevant information.

The Eligible Recipient will confirm that your disclosure has been received.

3. Confirmation of Consent

- The Eligible Recipient will confirm whether you consent to your identity being disclosed.
- If you do not consent to the disclosure of your identity, your identity will remain anonymous, unless disclosure is required legally. If disclosure is legally required, you will be notified of such.

4. Referral

- If you consent to your identity being disclosed, the disclosure will be referred (along with any consent) to the Whistleblower Protection Officer.
- If you wish to remain anonymous, a de-identified version of the disclosure will be shared with the Whistleblower Protection Officer. **Please note** - if it is not possible to prepare a de-identified disclosure, you will be informed that no further action can be taken without your consent.

5. Assessment

- The Whistleblower Protection Officer will assess the disclosure to determine if a formal investigation is required and whether the disclosure qualifies as a Protected Disclosure as set out in the Whistleblower Policy. In some instances, a formal investigation may not be necessary (i.e. where the matter has already been dealt with, less formal action will address the conduct, there is no or insufficient evidence available or MLA Group does not have the capability to investigate).
- The Whistleblower Protection Officer will use the Whistleblower policy to determine if a disclosure is a protected disclosure. The Whistleblower Protection Officer will use the **Whistleblower Assessment Checklist at Annexure B** which sets out various considerations the WPO should make when receiving a disclosure.

6. Determination

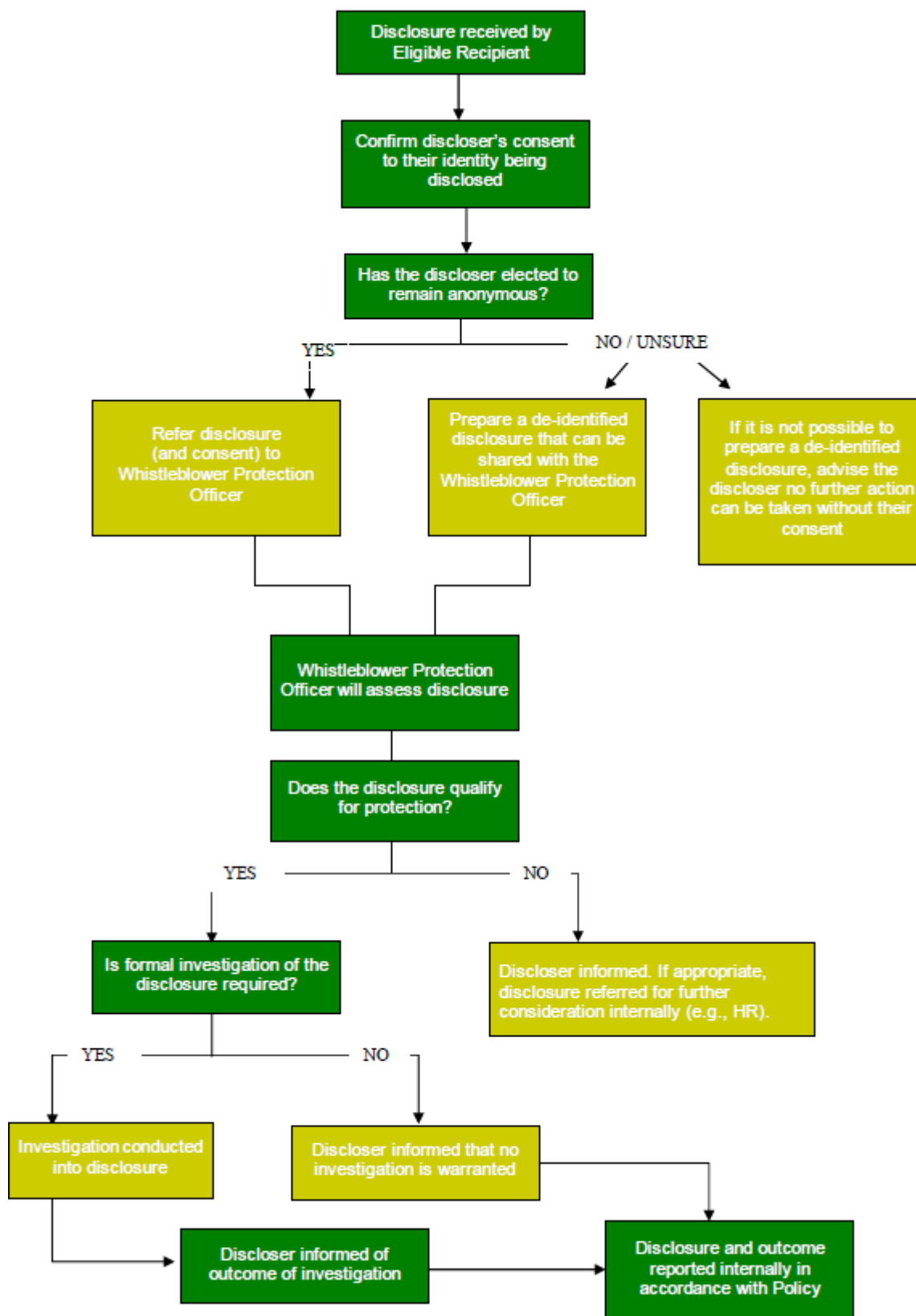
- If the Whistleblower Protection Officer is of the view that an investigation is warranted, the Whistleblower Protection Officer must refer the matter to the Legal team to initiate an investigation of the disclosure under Legal Professional Privilege (**LPP**) (for more guidance on LPP, please [click here](#)).
- The Whistleblower Protection Officer will prepare an investigation plan using the template **Investigation Plan at Annexure C** which will be used to guide the investigation through to its conclusion.
- Once the investigation has concluded, you will be informed of outcome.
- If no investigation is warranted, the Whistleblower Protection Officer will inform you of this decision and the reasons for the decision.
- All records relating to disclosures and investigations must be saved in a restricted folder in SharePoint that only the Whistleblower Protection Officer has access to and access provided to the Company Secretary, Chief Operating Officer or General Counsel (as appropriate).

7. Internal Reporting

- The disclosure and outcome of any investigation will be reported in accordance with policy. Please note that all documents and dealings concerning disclosures under MLA's Whistleblower Policy must be handled in accordance with [MLA's Confidentiality Policy](#).

This process ensures that all disclosures are handled with care, confidentiality, and in compliance with relevant laws/policies.

Table 1.1: Whistleblower Disclosure Workflow



Annexure B

Whistleblower Assessment Checklist

The Whistleblower Protection Officer should consider the following when receiving a disclosure and determining the best response (including whether a disclosure is a Protected Disclosure and whether a formal investigation is required):

Assessment checklist		Comment (if applicable)
1. Are the allegation/s clearly defined and understood for you to make a proper assessment?	<input type="checkbox"/>	
2. Does the disclosure qualify as a 'Protected Disclosure' in accordance with the Whistleblower Policy? If it is not, please consider how else the issues identified in the disclosure may be address and refer the issues to the appropriate pathway.	<input type="checkbox"/>	
3. Can the issue be dealt with without a formal investigation (ie is there a quick resolution that can be met without appointing an investigator)?	<input type="checkbox"/>	
4. Are there any actual, potential or perceived conflicts of interest which might impact an investigation and need to be dealt with?	<input type="checkbox"/>	
5. Is it appropriate that the MLA Group lead the investigation? Should it be referred to an external agency?	<input type="checkbox"/>	
6. Do any external authorities need to be notified?	<input type="checkbox"/>	
7. Is any technical, financial or legal advice required to support the investigation?	<input type="checkbox"/>	

Annexure C

Investigation Plan [Template]

The below Investigation Plan template is intended to assist the Whistleblower Protection Officer in the planning and oversight of any investigation of Protected Disclosures. The Investigation Plan should be used to note all key objectives and risks of the investigation prior to it being undertaken and used as a guide throughout the investigation.

A. Contact details

Discloser

Name	
Position	
Contact number	
Email	

Whistleblower Protection Officer

Name	
Position	
Contact number	
Email	

Primary investigator [Drafting note: To be determined by the Company Secretary or Chief Operating Officer (as appropriate). Recommend MLA Legal carry out the actual investigation to maintain Legal Professional Privilege (LPP) (see MLA Legal page for more information on [LPP](#)), while the WPO oversees it to ensure compliance but this may change from time to time]

Name	
Position	
Contact number	
Email	

Witness details [*Drafting note: Enter as applicable*]

Name	
Position	
Contact number	
Email	

B. Investigation details

Background

[Drafting note: Insert a brief summary of the issues raised and any key details relevant to the conduct]

Key persons

Person of Interest / Respondent	
Discloser	
Witness/es	
Other	

Scope of investigation

[Drafting note: Include a high-level scope of the investigation to be conducted]

Alleged contraventions

[Drafting note: Set out all alleged contraventions or breaches and their associated policies or rules]

Objectives of investigation

[Drafting note: Set out the objectives of the investigation ie any questions or issues that need to be examined or answered to properly examine the complaint and determine a resolution]

Sources of evidence

[Drafting note: Identify any evidence that will need to be collected to investigate the complaint, including how it can be obtained and who from]

Resources

[Drafting note: Consider whether any resources are required to conduct the investigation (ie the engagement of an external investigator)]

C. Allegations

Allegation 1	<i>[Drafting note: Include the details of all allegations which have been raised and will be considered as part of the investigation]</i>
Allegation 2	
Allegation 3	

D. Risk assessment

Nature of risk	Mitigation measures (if applicable)
<i>[Drafting note: List all potential risks that relate to the investigation. For example:</i> <ul style="list-style-type: none">Relationships between parties (is there a conflict of interest?)Financial risks/impactMedia and/or reputational risksLitigation risks]	

E. Methodology

The below methodology will be used to guide the investigation: *[Drafting note: Consider whether the below approach is appropriate for the investigation and amend as necessary]*

Phase 1: [Information gathering]	Phase 2 [Inquiries]
<p>The investigator will identify any information, documents or other materials which will need to be examined as part of the investigation.</p> <p>Consider:</p> <ul style="list-style-type: none">Who needs to be interviewed (and order of priority)?Are there any urgent matters for attention (i.e. gathering evidence before its deletion)?Are there any safety or wellbeing considerations for those involved, and does wellbeing assistance need to be offered to those individuals?Is any additional information required from the discloser before the investigation can commence?What questions need to be answered?	<p>The investigator will make inquiries as necessary to properly investigate the conduct. This may include interviews with the discloser, witnesses and/or respondents, accessing publicly available materials or conducting email and forensic reviews.</p>
Phase 3: [Assessment of evidence]	Phase 4 [Reporting]

Having conducted the appropriate inquiries and gathered all materials relevant to the investigation, the investigator will review all evidence available to confirm its credibility and begin to draw findings. This should include the analysis of any contradictory evidence and conducting further inquiries wherever necessary to address gaps in the evidence available.	The investigator will prepare an investigation report which records the findings of the investigation and its outcome.
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F. Reporting and communications

Who needs to receive updates on the investigation?

[Drafting note: Include the details of any individuals that should receive updates and how often. Copy and paste the below table to include any additional recipients]

Name	
Position	
Contact number	
Email	
Frequency of updates	

Records of communications

[Drafting note: The below should be kept as a running log of communications that occur as part of the investigation i.e. witness interviews, updates to the discloser]

Date	Time	Contact initiated by	Person contacted	File note

G. Progress reporting

[Drafting note: The below should be updated throughout the investigation as necessary]

Allegation 1

Element to be investigated	Required action	Resources required	Responsible person	Estimated completion date	Progress notes	Outcome
[E.g. Sharing of confidential information with adverse parties]	[E.g. Review emails sent by [x] to [x] between 1 January 2024 and 25 June 2024]	[E.g. IT assistance]	[E.g. Lisa James]	[E.g. 31 March 2025]	[E.g. 20 March 2024: IT provided emails for review. Lisa has begun reviewing and will report any findings ahead of 1 March 27 March 2024: Review completed. Lisa preparing report 1 April 2025: Interim report on findings emailed to [x]]	[Substantiated]
						[Substantiated / Unsubstantiated / Inconclusive]
						[Substantiated / Unsubstantiated / Inconclusive]

Allegation 2

Element to be investigated	Required action	Resources required	Responsible person	Estimated completion date	Progress notes	Outcome
						[Substantiated / Unsubstantiated / Inconclusive]
						[Substantiated / Unsubstantiated / Inconclusive]
						[Substantiated / Unsubstantiated / Inconclusive]