

Grievance & Whistleblower Policy vs 2 Jan 2024

Peter Rowland Group

Grievance & Whistleblower Policy

1. Purpose

Peter Rowland Group (PRG) is committed to maintaining a culture of integrity, accountability and lawful conduct.

This policy provides mechanisms for raising workplace grievances and reporting suspected misconduct in accordance with the **Corporations Act 2001 (Cth)** and applicable whistleblower protection laws.

2. Scope

This policy applies to:

- Directors and officers
- Employees (permanent, casual and temporary)
- Contractors and suppliers
- Former employees and associates

It applies across all PRG operations.

PART A – WORKPLACE GRIEVANCES

3. Grievance Resolution

Workplace grievances may relate to:

- Bullying, harassment or discrimination
- Unfair treatment
- Safety concerns
- Workplace conflict

Concerns may be raised with a Manager, Senior Leader or Human Resources.

PRG will:

- Acknowledge complaints promptly
- Conduct impartial investigations
- Provide procedural fairness
- Document findings and actions

Confidentiality will be maintained wherever possible.

PART B – WHISTLEBLOWER PROTECTION

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4. Reportable Conduct

Under the **Corporations Act 2001 (Cth)**, eligible whistleblowers may report misconduct or improper state of affairs relating to PRG, including:

- Fraud, corruption or theft
- Financial misconduct
- Breach of legal or regulatory obligations
- Serious misconduct or unethical behaviour
- Conduct posing significant risk to health, safety or reputation

5. Eligible Whistleblowers

Protections apply to:

- Current and former employees
- Officers and directors
- Contractors and suppliers
- Associates and their relatives

6. Protected Disclosures

To qualify for protection under the Corporations Act:

- The disclosure must be made to an eligible recipient (e.g., Director, Officer, Senior Manager, Auditor, or legal practitioner).
- The whistleblower must have reasonable grounds to suspect misconduct or improper conduct.

Anonymous disclosures are permitted.

7. Protections Under the Corporations Act

Eligible whistleblowers are entitled to:

- Protection of identity (confidentiality)
- Protection from civil, criminal or administrative liability
- Protection from victimisation or detriment
- Compensation and remedies if detriment occurs

It is a criminal offence to:

- Disclose the identity of a whistleblower without consent

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- Cause or threaten detriment to a whistleblower

PRG will not tolerate retaliation in any form.

8. Reporting Channels

Disclosures may be made to:

- A Director of PRG
- A Senior Manager
- Human Resources
- An external legal practitioner
- ASIC (where required under law)

Reports will be investigated confidentially and fairly.

9. False or Malicious Disclosures

Disclosures made in good faith are protected. Knowingly false or malicious allegations may result in disciplinary action.

10. Governance & Review

Senior Leadership is responsible for:

- Ensuring compliance with the Corporations Act whistleblower provisions
- Maintaining secure records
- Reviewing this policy periodically
- Ensuring staff awareness through induction and training

Commitment

Peter Rowland Group supports transparency and lawful conduct at all levels. Raising concerns in good faith is encouraged and protected under law.

All employees are informed of their rights and protections at induction and through ongoing governance training.