

Purpose and Scope

This policy ensures Coventry Group Ltd (CGL) fosters a culture of corporate compliance, ethical behaviour and good corporate governance. This policy outlines a framework by which all CGL directors, employees, contractors, employees of contractors and other relevant persons can raise concerns and give them reassurance that they will be protected from reprisals or victimisation for whistleblowing.

This whistleblowing policy is intended to protect you if you raise concerns regarding activities or behaviours at CGL which, are illegal; are dishonest, are fraudulent or corrupts are unethical; are unsafe; result in incorrect financial reporting; breach CGL's Code of Conduct; may cause financial loss to CGL or damage its reputation; otherwise amounts to serious improper conduct.

Authority

The Executive Leadership Team (ELT) is to authorise all policies. This policy was prepared by the Chief Financial Officer and is known in this policy as the Policy Owner.

Policy

Safeguards

Harassment, victimisation or retaliation for reporting concerns under this policy will not be tolerated. Every effort will be made to treat the complainant identity confidentially. It should be noted however that employees are encouraged to put their names to concerns reported to facilitate an effective investigation. Reports may only be disclosed with the consent of the complainant to the extent possible, consistent with the need to conduct an effective investigation and for CGL to comply with any statutory obligations. Concerns reported must be made in good faith. It is a serious disciplinary offence to make allegations to prove to be unsubstantiated and made maliciously or known to be false.

CGL Reporting Officer

The Chief Financial Officer & Company Secretary are responsible for investigating and resolving all reported concerns.

Process

Employment and workplace related concerns should be reported through normal channels such as your manager or supervisor. If that is not appropriate for whatever reason you should make your report to the CGL Reporting Officer. Other concerns, including those relating to activities which are illegal, fraudulent or unethical should be reported directly to the CGL Reporting Officer. As determined by the CGL Reporting Officer, the Chairman, CEO and/or Board Audit & Risk Committee will be advised as appropriate.

The CGL Reporting Officer will notify the complainant and acknowledge receipt of a report within 5 business days. All reports will be promptly investigated and, if warranted appropriate corrective action will be taken.

Associated Documents

- CGL Code of Conduct



Policy History

<u>Description</u>	<u>Reference #</u>	<u>Date</u>	<u>Authority</u>
Original Policy	HR 700 00	May 2004	Unknown
Revision #1	HR 700 01	June 2015	Board
Revision#2	CORP 300 01	June 2017	ELT
Revision #3	CORP 300 02	February 2018	ELT
Next Review Due		February 2020	ELT

