



CORP 300 00 – Whistleblower Policy

**CORP 300 00
Whistleblower Policy**

Purpose	To establish formal procedures and standards for a whistleblower protection program to enable CGL persons and other relevant stakeholders to report on workplace misconduct or non-compliance with corporate governance matters.
Table of Contents	Definitions 1 Policy 2 Reporting Responsibility 2 No Retaliation 2 Reporting Unacceptable Conduct 2 Report & Investigation Officer 3 Accounting & Audit Matters 3 Acting in Good Faith 3 Confidentiality 3 Handling of Reported Unacceptable Conduct 3 Related Policy 4

<p>Definitions</p>	<p>CGL <i>means</i> Coventry Group Ltd and its subsidiaries</p> <p>Unacceptable Conduct <i>means</i></p> <p>In the context of this policy any conduct which</p> <ul style="list-style-type: none">▪ is dishonest, fraudulent or corrupt;▪ is illegal, such as theft, drug sale or use, violence, harassment or intimidation, criminal damage to property or other breaches of state or federal laws;▪ is unethical, such as dishonestly altering company records or data, adopting questionable accounting practices or wilfully breaches CGL's Code of Conduct;▪ is potentially damaging to CGL or a CGL person, such as unsafe work practices or substantial wasting of company resources;▪ may cause financial loss to CGL or damage its reputation or be otherwise detrimental to CGL's interests; or▪ involves any other kind of serious impropriety. <p>CGL Person <i>means</i></p> <ul style="list-style-type: none">▪ CGL directors and employees (includes part-time and casual employees);▪ CGL contractors; and▪ employees of CGL contractors <p>Report & Investigation Officer <i>means</i> Company Secretary</p> <p>Whistleblower <i>means</i> a person being a CGL Person who, whether anonymously or not, makes, attempts to make, or wishes to make a report in connection with an Unacceptable Conduct.</p> <p>The whistleblower may avail themselves of protection against reprisal for having made the report.</p> <p>A whistleblower may or may not wish to remain anonymous.</p>
---------------------------	--

Policy	<p>The board of CGL is committed to fostering a culture of corporate compliance, ethical behaviour and good corporate governance. This is reinforced by CGL's Code of Conduct document. As a consequence, CGL will not act to the detriment of any employee as a consequence of their raising with management in good faith any breach of law or violation of CGL's principles or values or any other legal or ethical concerns.</p> <p>This Policy sets out CGL's commitment to maintaining an open working environment in which employees and contractors are able to report instances of unethical, unlawful or undesirable conduct without fear of intimidation or reprisal.</p> <p>Unethical, unlawful or undesirable conduct is referred to as Unacceptable Conduct in this Policy (refer to the definitions section for meaning and examples).</p>
Reporting Responsibility	<p>It is the responsibility of any CGL Person to comply with CGL's Code of Conduct and report any Unacceptable Conduct in accordance with this Policy.</p>
No Retaliation	<p>No CGL Person who in good faith reports an Unacceptable Conduct shall suffer detriment, either actual or threatened, harassment, retaliation or adverse employment or engagement consequence. If an employee retaliates against someone who has reported an Unacceptable Conduct in good faith they will be subject to disciplinary action up to and including termination of employment or services.</p>
Reporting Unacceptable Conduct	<p>This Policy is intended to encourage and enable employees and others to raise serious concerns within CGL.</p> <p>In most cases, employees should approach their supervisor first as they may be in the best position to address a concern.</p> <p>If employees are not comfortable speaking to their supervisor or not satisfied with their supervisor's response, they are encouraged to speak with anyone in management who they are comfortable approaching.</p> <p>Supervisors and managers are required to report suspected Unacceptable Conduct of CGL's Code of Conduct to the Report and Investigation Officer, who has specific and exclusive responsibility to investigate all reported violations.</p>

Report & Investigation Officer	<p>The Report and Investigation Officer is responsible for investigating and resolving all reported complaints and allegations concerning Unacceptable Conduct of CGL's Code of Conduct. As determined by the Report and Investigation Officer, the Chairman and Managing Director/Chief Executive Officer and/or the Board Audit & Risk Committee or its equivalent, will be advised as appropriate.</p> <p>The Report and Investigation Officer has direct access to the Board Audit & Risk Committee and is required to report to the Board Audit & Risk Committee at least annually on compliance activity.</p> <p>If any person is not comfortable speaking with the Report and Investigation Officer on a particular matter or if the complaint is against the Report and Investigation Officer or if they are unavailable and the matter is urgent, they should contact the Chairman or another member of the Board.</p>
Accounting & Auditing Matters	<p>The Board Audit & Risk Committee will address concerns raised in relation to corporate accounting practices, internal controls or auditing. The Report and Investigation Officer is responsible for notifying the Board Audit & Risk Committee of any such complaint and work with the Committee to resolve the matter.</p>
Acting in Good Faith	<p>Anyone filing a complaint concerning Unacceptable Conduct or suspected Unacceptable Conduct of CGL's Code of Conduct must act in good faith and have reasonable grounds for believing the information disclosed indicates Unacceptable Conduct of CGL's Code of Conduct. It is a serious disciplinary offence to make allegations that prove to be unsubstantiated and made maliciously or known to be false.</p>
Confidentiality	<p>Reports of Unacceptable Conduct or suspected Unacceptable Conduct will be kept confidential and may only be disclosed to ASIC, APRA, a member of the Australian Federal Police or to someone else with the consent of the discloser to the extent possible, consistent with the need to conduct an adequate investigation and for CGL to comply with any statutory obligations.</p>

Handling of Reported Unacceptable Conduct	The Report and Investigation Officer will notify the person who reported the alleged Unacceptable Conduct and acknowledge receipt of the report within 5 business days. All reports will be promptly investigated and, if warranted, appropriate corrective action will be taken. In conducting the investigations, the Report and Investigation Officer must ensure they observe the confidentiality obligations and in particular must not disclose the information reported, the identity of the person making the disclosure or any information that is likely to lead to the identification of the person making the disclosure.									
Related Policy	CGL's Code of Conduct should be read in conjunction with this Policy.									
Policy History	<table><thead><tr><th data-bbox="609 730 760 762">Description</th><th data-bbox="878 730 1040 762">Reference #</th><th data-bbox="1117 730 1182 762">Date</th></tr></thead><tbody><tr><td data-bbox="609 800 797 898">Original Policy Revision # 1 Revision # 2</td><td data-bbox="878 800 1024 831">CGL Board</td><td data-bbox="1117 800 1235 831">26.11.09</td></tr><tr><td data-bbox="609 932 834 963">Next Review Due</td><td></td><td></td></tr></tbody></table>	Description	Reference #	Date	Original Policy Revision # 1 Revision # 2	CGL Board	26.11.09	Next Review Due		
Description	Reference #	Date								
Original Policy Revision # 1 Revision # 2	CGL Board	26.11.09								
Next Review Due										

