



G8 Education Limited
ABN 95 123 828 553

Whistleblower Policy



G8 Education^{ltd}

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1 Introduction

This Policy outlines G8 Education's (**the Company**) process for the reporting in good faith any suspected fraudulent, unlawful or unethical behaviour involving the Company's business or practices and how the Company will ensure that any persons making a disclosure in good faith may do so in confidence and without retribution.

2 What is Reportable Conduct?

All Team Member, officers and external parties (including former Team Member, officers and external parties) such as suppliers and contractors are encouraged to report:

- dishonest, fraudulent or corrupt activity
- illegal, unlawful or corrupt activity such as theft or misuse of the Company's funds or property
- unethical behaviour or wilful breach of the Company's Code of Conduct or other policies and procedures
- unsafe work practices, environmental damage or activity that constitutes a serious risk to public health or safety
- behaviour that involves harassment, discrimination, victimisation or bullying
- any other serious improper conduct that may cause material financial or reputational loss or damage to the Company
- sexual offences (against, with or in the presence of, a child)
- sexual misconduct (against, with or in the presence of, a child)
- physical violence (against, with or in the presence of, a child)
- behaviour that causes significant emotional or psychological harm
- significant neglect.

Any of these activities is "**Reportable Conduct**".

3 Why do we have a Whistleblower policy?

The Company is committed to conducting business in accordance with the law and good business practice.

The Company encourages the notification of any fraud or unethical behaviour in strict confidence and without retribution. The Company recognises that its reputation is an essential element of its success.

The benefit to G8 Education in having a Whistleblower policy include:

- promoting a culture of openness, honesty and transparency; and
- advising Team Members of avenues for claims to be investigated where internal channels have been previously utilised;

3 Making a report

If you are a Team Member (or former Team Member) and you become aware of any Reportable Conduct, or reasonably believe that an activity is Reportable Conduct, you should report the matter to your supervisor, manager or department manager as per the G8 Education Team Member Grievance policy.

Alternatively, if you feel that this is not appropriate, you should exercise the reporting process available under this Policy. The Company will provide a confidential environment, free from retribution, for Team Member who wish to raise a Reportable Conduct in good faith.

A person making a report under this Policy is referred to as a “**Whistleblower**” and all information provided by a Whistleblower will be treated as confidential.

Reports can be made anonymously where a person wishes to not disclose their personal details. Protections exists for Whistleblowers where reports are made in good faith and are not vindictive in nature. Where claims are found to be vindictive, disciplinary action may be taken in accordance with the G8 Education Performance Improvement and Discipline policy.

Any person, including but not limited to Team Member, officers, suppliers and contractors of the Company, may make a report to the Whistleblower Protection Officer through any of the following channels.

- Telephone the G8 Education Misconduct Reporting Service on 1800 899 466
- Email G8MisconductReporting@deloitte.com.au
- Visit www.G8Education.deloitte.com.au
- Post a letter to:
 - o G8 Education Misconduct Reporting Service
 - Reply Paid 12628
 - A’Beckett Street
 - Melbourne Vic 8006

Where the matter concerns the Whistleblower Protection Officer or any senior officer of the Company, the matter may be reported to Ms Susan Forrester, the Chair of the People and Culture Committee, on the following contact details.

- Email SusanForrester@G8education.edu.au

4 Investigating a report

The General Counsel and Company Secretary performs the role of a **Whistleblower Protection Officer** for the Company and will manage this Policy and any matters reported under this Policy.

The Chair of the People and Culture Committee will assume this role for issues that may involve the General Counsel and Company Secretary or where there is a perceived conflict of interest.



The **Whistleblower Investigations Officer** is responsible for all investigations and this role is separate and independent of the Whistleblower Protections Officer.

This process will be undertaken in a manner which maintains the confidentiality of the Whistleblower and the details of the report will only be accessed by those with a business reason to do so as part of the investigation process.

The Whistleblower Investigations Officer will investigate all matters reported under this Policy as soon as reasonably practicable in a fair and objective manner. The investigation process will be undertaken in accordance with the G8 Education Investigations policy.

The Whistleblower Investigations Officer will provide feedback to the Whistleblower on the progress or outcome of an investigation within a reasonable period of time. Should the Whistleblower have concerns about the progress of the investigation, this should be escalated to the Whistleblower Protection Officer.

At the end of the investigation, a report will be completed and provided to the People and Culture Committee outlining the process that has been undertaken, the determined outcome and recommendations for remediation.

5 Protection of Whistleblowers

The Corporations Act gives special protection to disclosures where the following conditions are met.

The Whistleblower is:

- an officer of the company, or
- an employee of the company, or
- a supplier of goods and services to the company (or the supplier's employee).

The disclosure is made to:

- ASIC, or
- the Company's external auditor, or
- a director, secretary or senior manager of the Company, or
- any other person authorised to receive disclosure such as the Whistleblower Protection Officer.

The information must be of a kind where the Whistleblower, acting in good faith, has reasonable grounds to suspect that the information indicates that the Company (or an officer or employee of the Company) has or may have contravened the Corporations Act.

Where these conditions are met, the Corporations Act affords the Whistleblower the following protections:

- the person making the disclosure is not subject to disciplinary, civil or criminal liability for making the disclosure;
- no contractual or other remedy can be exercised or enforced against them for the disclosure;



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- the person will be treated fairly and no differently for having raised a concern;
- the person will not be disadvantaged in the workplace for having raised a concern;

The Whistleblower may or may not wish to remain anonymous when making the report. However, it should be noted that in order for a Whistleblower to obtain protection under the Corporations Act the Whistleblower must provide their name prior to providing the information.

Consideration will be given at the time as to whether an anonymous report can be accepted given the nature of the allegations made.

6 Amendment of this Policy

This Policy may be amended with the approval of the Board to ensure that it remains effective and meets best practice standards.

This Program will be reviewed by the Board on an annual basis to ensure that it is effective and meets the needs of stakeholders.