



G8 Education Limited
ABN 95 123 828 553

Whistleblower Policy



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1 Introduction

This policy outlines G8 Education Limited's (the **Company**) process for the reporting of 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 may do so in confidence and without retribution.

This policy is available on the Company's investor website at <https://g8education.edu.au/investor-information/corporate-governance/> and can be accessed by all officer and employees of the Company and any other person who is eligible to make a protected disclosure.

2 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 recognises that its reputation is an essential element of its success.

The Company encourages the notification of any Reportable Conduct (defined below) in strict confidence and anonymity and without retribution.

The benefits to the Company in having a Whistleblower Policy include:

- promoting a culture of openness, honesty and transparency;
- ensuring Eligible Disclosers (defined below) can recognise Reportable Conduct;
- ensuring Eligible Disclosers understand the framework and process for notifying of Reportable Conduct (i.e. how and to whom notification should be made); and
- advising Eligible Disclosers of avenues for claims to be investigated where internal channels have been previously utilised.

3 Who qualifies for protected disclosures?

A person may qualify for whistleblower protections under the *Corporations Act 2001* (Cth) if they are an Eligible Discloser, make a disclosure pertaining to Reportable Conduct and make a disclosure to an Eligible Recipient in accordance with this policy.

4 Who is an Eligible Discloser?

"Eligible Disclosers" include:

- Any current officers, employees, paid and unpaid suppliers or other external parties of the Company;
- Any former officers, employees, paid and unpaid suppliers or other external parties of the Company; and
- Any family member of any current or former officer, employee, paid and unpaid supplier or other external party of the Company.



5 What is Reportable Conduct?

Reportable Conduct includes any conduct where an Eligible Discloser has reasonable grounds to suspect that there is an improper state of affairs of the Company or the Company has engaged in misconduct (“**Reportable Conduct**”). If an Eligible Discloser become aware of any of the following types of Reportable Conduct, they are encouraged to report such activity to an Eligible Person (defined below):

- dishonest, fraudulent or corrupt activity;
- bribery;
- money laundering;
- terrorist financing;
- 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 (including against, with or in the presence of a child);
- sexual misconduct (including against, with or in the presence of a child);
- physical violence (including against, with or in the presence of a child);
- behaviour that causes significant emotional or psychological harm; and/or
- significant neglect.

Reportable Conduct does not include personal or professional work-related grievances which are not within the scope of protected disclosures.

6 Making a report

Who is an Eligible Person

Eligible Disclosers should be aware that an Eligible Person’s immediate manager or supervisor may not be an Eligible Person. To qualify for protected disclosure, all reports of Reportable Conduct must be made to any of the following persons (“**Eligible Persons**”):

- the officers of the Company, including the Directors and Company Secretary;
- any member of the Executive Leadership Team;
- the General Counsel of the Company;
- the Company’s auditors or actuaries; or
- the Chair of the People and Culture Committee.



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Disclosure to a lawyer for the purposes of obtaining legal advice will also be a protected disclosure. Accordingly, any external legal advisor of the Company is an Eligible Person for the purposes of this policy.

In order to report Reportable Conduct to an Eligible Person, Eligible Disclosers can select one of the following reporting methods:

- 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:
G8 Education Misconduct Reporting Service
Reply Paid 12628
A'Beckett Street
Melbourne VIC 8006

If the Reportable Conduct concerns the Whistleblower Protection Officer (i.e. the General Counsel and Company Secretary) or any member of the Executive Leadership Team or Director of the Company, the matter may be reported by email to the Chair of the People and Culture Committee: SusanForrester@G8education.edu.au

How to Make a Report

If you are an Eligible Discloser, you should report the matter to an Eligible Person.

The Company will provide a confidential environment, free from retribution, for any Eligible Discloser who wishes to raise Reportable Conduct.

An Eligible Discloser that makes a report of Reportable Conduct under this Policy is referred to as a “Whistleblower”. All information provided by a Whistleblower will be treated strictly confidentially.

Reports can be made anonymously where a person wishes to not disclose their personal details. The protections set out in section 8 below exist for Whistleblowers making reports of legitimate Reportable Conduct. Where claims are found to be vindictive or there are no reasonable grounds to suspect Reportable Conduct, disciplinary action may be taken in accordance with the G8 Education Performance Improvement and Discipline policy.

7 Investigating a report

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

The “**Whistleblower Investigation Officer**” is the General Manager People & Culture. The Whistleblower Investigations Officer is responsible for all investigations. This role is separate and independent of the Whistleblower Protections Officer.



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The Whistleblower Investigations Officer will investigate (themselves or with the assistance of a select investigation team) 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 investigation process will be undertaken in a manner which maintains the confidentiality of the Whistleblower. The details of the Reportable Conduct will only be accessed by those with a business reason to do so as part of the investigation process.

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 where required.

8 Protection of Whistleblowers

Where a Whistleblower qualifies for protection for disclosure of Reportable Conduct in accordance with this policy, the Corporations Act affords the Whistleblower the following protections:

- the Whistleblower's identity will be kept confidential, unless the Whistleblower provides their consent or any exceptions apply;
- 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;
- the information disclosed will not be admissible in evidence against the Whistleblower in criminal proceeds, or proceedings for the imposition of a penalty, other than proceedings which relate to the provision of false information;
- the person will be treated fairly and no differently for having raised a concern; and
- 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 having regards to the nature of the allegations made.

8 Amendment of this Policy

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



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