



G8 Education Limited
ABN 95 123 828 553

Whistleblower Policy



G8 Education^{ltd}

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1 Introduction

This policy outlines G8 Education Limited's (the **Company**) process for the reporting of any suspected misconduct, or improper state of affairs or circumstances (such as fraudulent, unlawful or unethical behaviour) involving the Company or its 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 officers 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 its 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 in section 5 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 in section 4 below) can recognise Reportable Conduct;
- ensuring Eligible Disclosers understand and have confidence in the framework and process for notifying of Reportable Conduct (i.e. how and to whom notification should be made); and
- advising Eligible Disclosers about how the Company will investigate protected disclosures.

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 or unpaid suppliers or other external associates of the Company;
- Any former officers, employees, paid or unpaid suppliers or other external associates of the Company; and
- Any family member or dependant of any current or former officer, employee, paid or unpaid supplier or other external party of the Company, or a dependant of any such individual's spouse.



5 What is Reportable Conduct?

Reportable Conduct includes any conduct where an Eligible Discloser has reasonable grounds to suspect that there is misconduct or an improper state of affairs or circumstance in relation to the Company (“**Reportable Conduct**”). Reportable Conduct includes, but is not limited to:

- 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 conduct to the extent that it concerns a personal or professional work-related grievance.

Examples of work-related grievances which are not within the scope of protected disclosures include:

- an interpersonal conflict between the discloser and another Team Member;
- a decision not to promote the discloser;
- a decision not to alter the terms of the discloser’s employment (such as by granting the discloser an increase in remuneration); and
- a decision to suspend or terminate the discloser’s employment or to otherwise take disciplinary action with respect to the discloser (such as by issuing a formal warning).

If any Eligible Discloser has reasonable grounds to suspect there has been any kind of Reportable Conduct, they are encouraged to report such conduct to an Eligible Recipient (defined in section 6 below)

6 Making a report

Who is an Eligible Recipient?

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

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

Disclosure to a lawyer for the purposes of obtaining legal advice will also be a protected disclosure.

In order to report Reportable Conduct to an Eligible Recipient, Eligible Disclosers can select one of the following reporting methods, or another method:

- **Email whistleblower@g8education.edu.au**
- Telephone the Whistleblower Protection Office (General Counsel & Company Secretary) on 0402 209 109 Email the Whistleblower Protection Office (General Counsel & Company Secretary) on tracey.wood@g8education.edu.au
- Telephone or email any other Executive Leadership Team member of the Company
- Post a letter to:
Attention: Whistleblower Protection Officer
G8 Whistleblower
159 Varsity Parade
Varsity Lakes QLD 4227

Reports regarding Executive Leadership Team or Director: If the Reportable Conduct concerns the Whistleblower Protection Officer or any member of the Executive Leadership Team or a Director of the Company, Eligible Disclosers are encouraged to report 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 any Reportable Conduct to an Eligible Recipient only.

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, and the identity of the Whistleblower must be treated strictly confidentially by the Eligible Recipient.

Reports of Reportable Conduct to an Eligible Recipient may 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 vexatious or baseless 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 concern the General Counsel and Company Secretary, or any direct report of the General Counsel and Company Secretary, or where there is any real or perceived conflict of interest.

The “**Whistleblower Investigation Officer**” is the Chief People & Transformation Officer. The Whistleblower Investigations Officer is responsible for all investigations. This role is separate and independent of the Whistleblower Protections Officer. The Whistleblower Protection Officer will assume this role for issues that concern the Chief People & Transformation Officer, or any direct report of the Chief People & Transformation Officer or where there is any real or perceived conflict of interest.

Any Eligible Recipient who receives a report of Reportable Conduct must, subject to the Eligible Disclosers consent, notify the Whistleblower Protection Officer of that report as soon as practicable following receipt.

The Whistleblower Protection Officer will then engage the Whistleblower Investigation Officer to investigate the report received.

The Whistleblower Investigations Officer will investigate (themselves or with the assistance of a select investigation team) all Eligible Disclosures of which it is notified 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’s identity. The details of the Reportable Conduct will only be accessed by those with a legitimate business reason to do so as part of the investigation process.

The Whistleblower Investigations Officer will provide feedback to the Whistleblower and the Whistleblower Protection Officer on the progress or outcome of an investigation within a reasonable period of time, having regard to the circumstances and the nature of the Eligible Disclosure. 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 Whistleblower Protection Officer and the People and Culture Committee outlining the process that has been



undertaken, the determined outcome and recommendations for remediation or other action 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 and information likely to lead to the identification of the Whistleblower will be kept confidential, unless the Whistleblower provides their consent, or any exceptions under the Corporations Act apply;
- the Whistleblower will not be subject to any disciplinary, civil or criminal liability for making an Eligible Disclosure;
- no contractual or other remedy can be exercised or enforced against a Whistleblower for making an Eligible Disclosure;
- the information disclosed by the Whistleblower will not be admissible in evidence against the Whistleblower in criminal proceedings, or proceedings for the imposition of a penalty, other than proceedings which relate to the provision of false information;
- the Whistleblower will be treated fairly and no differently for having made an Eligible Disclosure; and
- the Whistleblower will not be disadvantaged in the workplace for having made an Eligible Disclosure.

The Whistleblower may or may not wish to remain anonymous when making the report. There is no requirement for a Whistleblower to identify himself or herself in order for an Eligible Disclosure to qualify for protection under this policy of the Corporations Act.

8 Amendment of this Policy

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

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