

WHISTLEBLOWER POLICY

Policy Aim:

At Stef's Transport Pty Ltd ('the Company'), our company values are the foundation of how we conduct ourselves, and how we interact with clients, internal and external stakeholders. The Company is committed to ensuring corporate compliance and promoting ethical behaviours by observing the highest standards of honesty and integrity in business our dealings

Policy Purpose:

The Company via this policy encourages the reporting of suspected unethical, illegal, corrupt, fraudulent or undesirable behaviour and provides protections to the person who discloses such conduct without fear of victimisation or reprisal.

The policy applies to any person who is, or has been one of the below with respect to Stef's Transport Pty Ltd;

- Executive Officer,
- Director/Manager,
- Employee,
- Contractor,
- Auditor/Accountant/Consultant,
- Spouse or dependant of any of the above.

Conduct:

A person may make a report or disclosure pursuant to the policy if you have reasonable grounds to believe a person (listed above) or other person who has business dealings with the Company has engaged in reportable conduct, defined below as;

- Dishonest, fraudulent, corrupt conduct;
- Illegal behaviour (such as theft, dealing in or using illicit substances, violence or threatened violence, property damage);
- Unethical behaviour, including breaching company policy, Code of Conduct, oppressive or gross negligence;
- Behaviours that are potentially damaging to the Company, its employees or an associated third party;
- Misconduct or improper behaviour;
- A danger to Company finances

NB: Reportable Conduct does not include personal workplace, work related grievances, that should be reported to the relevant Manager.

Disclosure:

The Company relies upon its employees maintaining an honest and ethical workplace culture and accordingly, it is expected if you become aware of reported conduct, a disclose is made pursuant to this policy.

Issue Date	Review Date	This document in printed form is an UNCONTROLLED document.	Issue
Nov. 2020	Nov. 2021		2

Internal Reporting:

You may disclose to Reportable Conduct to the following Whistleblowing Protection Officers;

- Finance Manager, Karen Pulmer
0418 858 068 karen@3mp.net.au
- General Manager, Ronald Parry
0477 004 011 ron.parry@stefstransport.net.au
- Compliance Manager, Damon Hogg
0448 057 974 damon@stefstransport.net.au

If you unable to use any of the above Protection Officers, you may report to an Executive, Director, Senior Manager or an Auditor. These persons are expected to ensure your protections pursuant to this policy.

Anonymity:

When making a disclosure you may do so anonymously, however this can make the investigation of allegations difficult. The Company encourages you to provide your identity when making a disclosure.

External Reporting:

Should you make a reportable conduct disclosure to the Australian Securities and Investment Commission (ASIC) or the Australian Prudential Regulation Authority (APRA) you will be covered by the protections in this policy.

Should you discuss your concerns with a legal practitioner for the purpose of advice or representation, you will be covered by the protections in this policy.

Public Interest Disclosures:

Public Interest Disclosures can only be made to a journalist or a parliamentarian. For further information, please refer to the *Public Interest Disclosure Act 2018*.

Investigation:

The Company will ensure an investigation is undertaken as soon as possible after the disclosure is received. A Whistleblower Protection Officer will conduct the investigation and may, if necessary, utilise an independent investigator. Investigations will be conducted observing procedural fairness and with all reasonable efforts to preserve confidentiality.

If the 'Whistleblower' is not anonymous, the Protection Officer or the independent investigator will contact you to discuss the investigation process and other matters relevant to the investigation, including confidentiality as it applies. However, if the disclosure is anonymous, the 'Whistleblower' cannot be contacted.

Protection:

The Company is committed to ensuring that any person who makes a disclosure is treated fairly, does not suffer detriment and confidentiality is preserved in respect to all matters raised pursuant to this policy.

Any person will not be subject to civil, criminal or administrative actions for making a disclosure under this policy or participating in an investigation. Any information provided will not be admissible in criminal or civil proceedings, other than for proceedings for the provision of knowingly false information.

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Nov. 2020	Nov. 2021		2

The Company (or any person engaged by the Company) will not engage in detrimental conduct against you if you have made a disclosure or been involved in an investigation pursuant to this policy.

Detrimental Conduct includes, but is not limited to;

- Termination of employment,
- Demotion or disciplinary actions,
- Harassment, discrimination, victimisation

The Company will take all reasonable steps to protect you from such detrimental conduct, should it be identified.

Confidentiality:

All information shall be treated with confidentiality and sensitivity.

If a Whistleblower makes a disclosure pursuant to this policy, your identity (or information that is likely to identify you) will only be shared if:

- The Whistleblower provides consent, or
- The disclosure of the identify is allowed by law, or
- The report is made to ASIC, APRA, Australian Taxation Office or the Australian Federal Police,
- Where it is necessary to disclose information for effective investigation and this is likely to lead to your identification, all reasonable steps will be taken to reduce the risk of identification.

Other Matters:

Any breach of this policy will be taken seriously and may result in disciplinary action, up to and including employment termination.

NB: Malicious false reports made by a person purporting to be a Whistleblower are a breach of this policy.

This policy imposes obligations on the Company; however those obligations are not contractual and do not give rise to any contractual rights.

Name: _____

Company: _____

Position: _____

Sign: _____

Date: / /

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