



# Whistleblower Policy

**Oldfields Holdings Limited**

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## Whistleblower Policy

### Oldfields Holdings Limited (ABN 92 000 307 988) and its subsidiaries (the OLH Group)

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## 1. Introduction and Purpose

### 1.1 Background

The OLH Group is committed to promoting and supporting a culture of corporate compliance and ethical behaviour.

The Corporations Act 2001 (Cth) and the Taxation Administration Act 1953 (Cth) provide protections for persons who make a “**Qualifying Disclosure**” (refer to section 3.1 below) (“**Whistleblower Protection Scheme**”).

This Whistleblower Policy (“**Policy**”) is an important tool in deterring corrupt, illegal or other undesirable conduct and uncovering such conduct that may not otherwise be reported or uncovered.

### 1.2 Purpose

Oldfields Holdings Limited (OLH) is a company listed on the Australian Securities Exchange and has responsibilities to its shareholders, employees, directors, clients and regulators to comply with applicable laws and legislation. The responsibilities of the OLH Board include oversight of compliance with regulatory, ethical and prudential requirements.

The OLH Group is committed to fostering a supportive environment for its employees and creating positive and open relationships with all internal and external stakeholders. This Whistleblower Policy (Policy) has been adopted to ensure that people feel comfortable and supported in coming forward with a disclosure and to raise any concerns of any actual or suspected misconduct, or any improper state of affairs or circumstances, without fear of reprisal or feeling threatened by doing so. It is also important that Disclosers (refer to section 2 below) are aware of and understand the legal protections available to them. The OLH Group encourages individuals to report all matters of actual or suspected misconduct, or state of affairs or circumstances, pursuant to this Policy.

The OLH Group expects all officers and employees of the OLH Group to read and familiarise themselves with this Policy.

#### **The purpose of this Whistleblower Policy is:**

- to help deter wrongdoing, in line with the entity’s risk management and governance framework;
- to ensure individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported;
- to ensure disclosures are dealt with appropriately and on a timely basis;
- to provide transparency around the entity’s framework for receiving, handling and investigating disclosures;
- to support the entity’s values, code of conduct and/or ethics policy;
- to support the entity’s long-term sustainability and reputation;
- to meet the entity’s legal and regulatory obligations; and
- to align with the ASX Corporate Governance Principles and Recommendations (which applies to listed companies) and relevant standards.

**This Policy provides information about:**

- the protections available to Disclosers under this Policy;
- the types of disclosures that qualify for specific protections under the law;
- how and to whom disclosures can be made;
- how the OLH Group handles disclosures; and
- how the OLH Group supports Disclosers and ensures the fair treatment of any employee or officer.

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## 2. Scope – who does this Policy apply to?

This Policy applies to all business units of the OLH Group. Specifically, this Policy applies to the following persons (**Disclosers**):

- any current or former officer, employee, associate or contractor (or their employee) of the OLH Group;
- any person who supplies goods or services to the OLH Group (such as current and former contractors, consultants, service providers and business partners) (whether paid or unpaid) and their employees;
- an associate (as defined by the *Corporations Act 2001* (Cth)) of the OLH Group; and
- someone who is a relative, dependent or spouse, of any of the people listed above.

The Board and Management of the OLH Group encourage all individuals that satisfy the criteria above to disclose any actual or suspected misconduct, or any improper state of affairs or circumstances, as this provides the OLH Group an opportunity to take corrective measures to remedy it, in the most expeditious manner possible. This Policy is a part of the OLH Group's corporate governance framework.

The Board reiterates that any employee who raises a concern of actual or suspected misconduct, or of any improper state of affairs or circumstances will not be discriminated against in their employment with the OLH Group.

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## 3. Matters this Policy applies to

All Disclosers are encouraged to make a disclosure if they have reasonable grounds to suspect or are aware of any misconduct, or an improper state of affairs or circumstances. This includes any actual or suspected wrongdoing, illegal, unacceptable or undesirable conduct, and includes any contravention of the OLH Group Code of Conduct, each of the OLH Group's policies or the law.

A disclosure of concern does not need to involve any actual or suspected contravention of law. Additionally, information that indicates a significant risk to public safety or the stability of, or confidence in, the financial system is also a matter that should be disclosed, even if it does not involve a breach of law.

### 3.1 Requirements for a Qualifying Disclosure

Disclosers must make their disclosure to an “**Eligible Recipient**” (refer below) or to certain regulators (refer to section 4.2 below, e.g. ASIC, APRA, ATO) in order to qualify for protection under the Whistleblower Protection Scheme.

A Qualifying Disclosure under the Whistleblower Protection Scheme is when a Discloser makes a disclosure to an **Eligible Recipient**, and the Discloser has reasonable grounds to suspect that the disclosure concerns a “**Disclosable Matter**” (refer to section 3.2 below).

Disclosures that are not Qualifying Disclosures do not qualify for protection. Non-qualifying disclosures may be protected under other legislation, such as in Australia the *Fair Work Act 2009 (Cth)*.

An “**Eligible Recipient**” under the Whistleblower Protection Scheme and in relation to this Whistleblower Policy is any one of the following:

- a) an officer or senior manager of an OLH Group entity;
- b) an auditor (internal or external) of an OLH Group entity; or
- c) a person authorised by the OLH Group to receive Qualifying Disclosures (refer to section 4.1 below).

For matters relating to tax affairs of the OLH Group only, an “**Eligible Recipient**” is, in addition to the above:

- a) any registered tax agent or BAS agent who provides tax agent or BAS services to any OLH Group entity;
- b) an OLH Group employee who has functions or duties that relate to the tax affairs of any OLH Group entity.

### 3.2 What is a Disclosure Matter?

A “**Disclosable Matter**” under the Whistleblower Protection Scheme is information that:

- a) Concerns misconduct, or an improper state of affairs or circumstances in relation to any entity within the OLH Group; or
- b) Indicates that any entity in the OLH Group or one of its officers or employees has engaged in conduct that:
  - i) constitutes an offence against the *Corporations Act 2001 (Cth)*, *ASIC Act*, *Banking Act 1959*, *Financial Sector (Collection of Data) Act 2001*, *Insurance Act 1973*, *Life Insurance Act 1995*, *National Consumer Credit Protection Act 2009*, *Superannuation Industry (Supervision) Act 1993*, and any instrument made under these Acts;
  - ii) constitutes an offence against Commonwealth legislation that is punishable by imprisonment for 12 months or more;
  - iii) represents a danger to the public or the financial system; or
  - iv) is prescribed by regulation.

Disclosable matters can also be in relation to the tax affairs of an entity in the OLH Group if the Discloser considers that this information may assist the OLH Group to perform functions or duties in relation to its tax affairs.

Examples of conduct that may be a Disclosable Matter include conduct that breaches any legal or regulatory requirement or conduct that while not involving a contravention of a particular law, is a breach of the OLH Code of Conduct and Ethics or any other OLH Group policies.

**Examples of Disclosable Matters include but not limited to the following:**

- a) fraud;
- b) negligence;
- c) breach of duty or trust;
- d) default;
- e) criminal offences;
- f) failure to comply with any legal obligation;
- g) failure to comply with any other obligation of OLH as a company listed on the ASX;
- h) unfair or unethical dealing with a customer, supplier or agent of the OLH Group;
- i) corrupt conduct;
- j) human rights abuses;
- k) risk to the health or safety of any person;
- l) unethical conduct; or
- m) any deliberate concealment relating to the above.

Disclosers can still qualify for the protections under the Whistleblower Protection Scheme even if their disclosure turns out to be incorrect or unsubstantiated, as long as they had reasonable grounds to suspect that a Disclosable Matter existed at the time of the disclosure.

Generally, disclosures that relate solely to personal work-related grievances do not qualify for protection under the Whistleblower Protection Scheme. A disclosure will concern a personal work-related grievance of the Discloser if the information:

- a) concerns a grievance about any matter in relation to the Discloser's employment, or former employment, having or tending to have implications for the discloser personally; and
- b) does not have significant implications for the OLH Group unrelated to the Discloser; and
- c) does not concern conduct or alleged conduct in section 3.1 above – item b of the criteria for the Disclosable Matter.

Examples of disclosures regarding personal work-related grievances that may not qualify for protection include:

- a) an interpersonal conflict between a Discloser and another employee;
- b) a decision that does not involve a breach of workplace laws;
- c) a decision relating to the engagement, transfer or promotion of the Discloser;
- d) a decision relating to the terms and conditions of engagement of the Discloser; or
- e) a decision to suspend or terminate the engagement of the Discloser, or otherwise discipline the Discloser.

A disclosure of a personal work-related grievance may still qualify for protection if it:

- a) concerns a Disclosable Matter that is accompanied by a personal work-related grievance;
- b) concerns a potential breach of Commonwealth laws punishable for a period of 12 months or more;
- c) concerns any OLH Group entity engaging in conduct that represents a danger to the public;
- d) concerns any OLH Group entity engaging in misconduct that extends beyond the Discloser's personal circumstances;
- e) concerns allegations that the Discloser or another person has suffered, or has been threatened with, detriment as a result of the Discloser making a Qualifying Disclosure; or
- f) involves a Discloser seeking legal advice about the operation of the Whistleblower Protection Scheme.

Disclosures that relate solely to personal-work related grievances that do not qualify for protection under the Whistleblower Protection Scheme will generally be dealt with under the OLH Group's other policies and guidelines.

If a disclosure by an employee is found to be malicious, deliberately misleading or frivolous, the employee may be subject to disciplinary action.

## 4. How to make a disclosure under this Policy

### 4.1 Internal reporting procedures

Disclosers who become aware of any matter or behaviour which they think should be disclosed have the option of reporting it internally to any one of the people referred to below:

- report the matter to one of the designated senior managers of the OLH Group outlined in Annexure A;
- If a Qualifying Disclosure relates to, or may give rise to a conflict with:
  - a designated senior manager, that disclosure should be made to the Group Chief Executive Officer;
  - the Group Chief Executive Officer or a Director of Oldfields Holdings Limited, that disclosure should be made to the Chair of the Board; or
  - the Chair of the Board, that disclosure should be made to the Chair of the Corporate Compliance Committee,

They will not disclose your identity without your permission or until required by law (refer to section 6 below). Please refer to Annexure A for contact details for each of the individuals referred to above.

### 4.2 External reporting procedures

Alternatively, Disclosers can make a disclosure to an external independent entity appointed by the OLH Board, Stopline Pty Ltd, at a time convenient to them, without fear of identification, retribution or reprisal. Refer to Annexure B for contact details.

Disclosers can also disclose to an auditor or member of an audit team who is conducting an audit of the OLH Group or any part of it.

#### *Legal Practitioners*

In Australia, disclosures of information to a qualified legal practitioner for the purpose of taking legal advice or legal representation in relation to the operation of the Whistleblower Protection Scheme also qualify for protection (even in the event that the legal practitioner concludes that a disclosure does not relate to a Disclosable Matter).

#### *ASIC, APRA and ATO*

While the Company encourages Disclosers to make disclosures internally, a Discloser may choose to make a disclosure about a Disclosable Matter directly to a regulator in the relevant jurisdiction. In Australia, the Australian Securities and Investments Commission (“ASIC”), the Australian Prudential Regulatory Authority (“APRA”), the Commissioner of Taxation through the Australian Tax Office (“ATO”) (in relation to tax affairs only) or another Commonwealth body prescribed by regulations are able to receive disclosures that qualify for protection under the Whistleblower Protection Scheme.

The respective websites of ASIC, APRA and the ATO provide further detail about when and how a Discloser may make a disclosure to each body.

In Australia, where a Discloser has previously made a Qualifying Disclosure to ASIC, APRA, or another Commonwealth body prescribed by regulation, that person may be eligible to make a disclosure that qualifies for protection under the Whistleblower Protection Scheme, to a journalist or to a **“Member of Parliament”** (being a Member of an Australian Commonwealth or State Parliament or an Australian Territory Legislature) – being a **“Public Interest Disclosure”** or **“Emergency Disclosure”** – if they meet the criteria set out below. [Note: this does not apply to disclosures to the ATO in respect of tax affairs.]

A **Public Interest Disclosure** is a disclosure made to a journalist or Member of Parliament where:

- a) at least 90 days have passed since the previous making of a Qualifying Disclosure to ASIC, APRA or another prescribed Commonwealth body;
- b) the Discloser does not have reasonable grounds to believe that action has been, or is being taken in relation to their Qualifying Disclosure;
- c) the Discloser has reasonable grounds to believe that making a further Qualifying Disclosure is in the public interest;
- d) the Discloser has given prior written notice to ASIC, APRA or the Commonwealth body to which they made their previous Qualifying Disclosure, outlining that they intend to make a Public Interest Disclosure and providing sufficient information so as to identify their previous Qualifying Disclosure; and
- e) the extent of the information disclosed in the public interest disclosure is no greater than to inform the journalist or Member of Parliament of the misconduct, or improper state of affairs or circumstances, or other conduct falling within the scope of the Whistleblower Protection Scheme.

An **Emergency Disclosure** is a disclosure made to a journalist or Member of Parliament where:

- a) a Qualifying Disclosure has previously been made to ASIC, APRA, or another prescribed Commonwealth body;
- b) the Discloser has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment;
- c) the Discloser has given prior written notice to the Commonwealth body to which they made their previous Qualifying Disclosure, outlining that they intend to make an Emergency Disclosure and providing sufficient information so as to identify the previous Qualifying Disclosure; and
- d) only includes information to the extent necessary to inform the journalist or Member of Parliament of the substantial and imminent danger is disclosed.

Disclosers should seek the advice of an independent legal adviser before making a disclosure to a regulator in a jurisdiction, a Public Interest Disclosure or an Emergency Disclosure as outlined above. It is important that a Discloser understands the criteria for protection under the relevant legislation.

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## 5. How is a Qualifying Disclosure handled under this Policy?

### 5.1 Internally

Disclosers can make a disclosure internally at a time convenient to them, without fear of identification, retribution or reprisal.

It is preferred that Disclosers identify themselves when making a disclosure, as this greatly assists the investigation process. However, Disclosers may choose to make their disclosure anonymously and remain anonymous over the course of the investigation and after the investigation is finalised. They may also decide not to answer questions that they feel could reveal their identity at any time, including during follow-up conversations. In these circumstances, for Qualifying Disclosures, the protections under the Whistleblower Protection Scheme still apply. If a disclosure is made anonymously, the Discloser should provide sufficient information to allow the matter to be properly investigated and the OLH Group encourages Disclosers to provide an anonymous email address, and adopt a pseudonym for the purpose of the disclosure, through which additional questions can be asked and information provided and to assist in protecting anonymity.

An internal disclosure will be assessed and if applicable, subject to investigation which will commence as soon as practicable after the matter has been disclosed, but in any event within

20 business days of disclosure. As part of this preliminary investigation, OLH will assess each disclosure to determine whether:

- it qualifies for protection; and
- a formal investigation is required.

All disclosures which are the subject of an investigation will be investigated thoroughly with the objective of locating evidence that either substantiates or refutes the claims made in the disclosure.

Investigations will be fair and independent. While the process and timelines may vary depending on the nature of the disclosure, OLH will aim to finalise its investigation of an internal disclosure within 90 days of the initial disclosure.

This investigation will be coordinated by a senior member of the OLH Group who may seek the involvement of other individuals in the OLH Group to assist in the investigation and may obtain the advice or participation of external and internal experts, as required.

Any OLH Group employee related to the allegation will be specifically excluded from conducting the investigation.

In the course of handling and investigating the report, the OLH Group will determine:

- the nature and scope of the investigation;
- the person(s) within and/or outside of the OLH Group that should lead the investigation;
- the nature of any technical, financial or legal advice that may be required for the investigation;
- the timeframe for the investigation; and
- whether in the circumstances it is appropriate or necessary for the investigation to be undertaken jointly with an external investigation firm (e.g. when additional specialist skills or expertise are necessary).

**The OLH Group may investigate a disclosure in a number of ways, including the following:**

- the OLH Group may ask the Discloser for consent to a limited disclosure to other persons within the OLH Group (such as to the senior member who will coordinate the investigation);
- conducting a broad review of the subject matter or the work area disclosed; and
- in the event of an anonymous disclosure, the OLH Group may investigate the disclosure, even if the OLH Group cannot get in contact with the Discloser (provided the OLH Group has been given sufficient information and if the OLH Group removes information that is likely to lead to the Discloser's identification).

Information disclosed by individuals under this Policy may be revealed to other people involved in the investigation. The OLH Group will not disclose the Discloser's identity without their prior consent. The OLH Group will also not disclose information where it is likely the Discloser's identity will be disclosed. However, the OLH Group may not be able to undertake an investigation if it is not able to contact the Discloser (for instance, if the disclosure is made anonymously and is unclear and the Discloser has refused to provide, or has not provided, a means for the OLH Group to contact him or her).

If the Discloser is able to be contacted, the OLH Group will provide them with regular updates during the key stages, such as when the investigation has begun, when the investigation is in progress, and after the investigation has been finalised. In doing so, the OLH Group will ensure that the Discloser's anonymity is not compromised. Please be aware that the frequency and timeframes will vary depending on the nature of the disclosure.

If the Discloser is able to be contacted, the OLH Group may provide them with the outcome of the findings of its investigation within a reasonable time after it has finalised its investigation. However, there may be circumstances where it may not be appropriate to provide the Discloser with details about the outcome of the investigation.

While the method for documenting and reporting the findings of an investigation will depend upon the nature of the disclosure, once the investigation is completed, a report will be prepared which will document the findings from the investigation. In order to preserve confidentiality, the OLH Group will not disclose information within the report where it is likely that the Discloser's identity will be disclosed.

A copy of this report will be provided to the Corporate Compliance Committee, who will review the incident and the report and consider remedial action, including any remedial action in relation to the OLH Group's regulatory obligations. A copy of the report and the recommendations of the Corporate Compliance Committee will then be forwarded to the Board for review and if appropriate, implementation.

## 5.2 Externally

Where a disclosure is made externally to Stoplevel Pty Ltd, they will analyse the disclosure and upload it to the OLH Group area of Stoplevel's website along with a suggested course of action within one business day of their receipt of the disclosure. This will be viewed by an authorised OLH Group employee who will then investigate the matter internally. The investigation and resolution of the matter may have to be delegated to another employee of the OLH Group in certain circumstances (rather than the authorised OLH Group employee who views the disclosure via the Stoplevel Pty Ltd website).

At this point, the process outlined above in respect of internal disclosures will apply to the disclosure, as if the disclosure had been made internally.

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## 6. How is a Discloser protected under this Policy?

### 6.1 Confidentiality

Under the Whistleblower Protection Scheme, Disclosers making a Qualifying Disclosure are protected at law by the requirement that their identity, and information that may lead to their identification, must be kept confidential, subject to relevant exceptions outlined below.

**Exception for consent:** a Discloser's identity can always be disclosed with their consent. If a Discloser qualifies for protection, it is likely that the Discloser will be asked to provide consent to the disclosure of their identity or information that is likely to lead to their identification. This would be to facilitate any investigation and/or resolution of the matter. If consent is withheld, it may not be possible to adequately investigate and respond (if at all) to the disclosure.

**Exception for disclosure to authorities:** It will still be lawful to disclose a Discloser's identity to ASIC, APRA, the Australian Federal Police or the ATO (such bodies can disclose the identity of a Discloser to specified authorities to help them in the performance of their functions or duties). Disclosures to a legal practitioner for the purpose of obtaining advice or representation about the application of the Whistleblower Protection Scheme, are also lawful.

**Exception to disclose certain information:** It will also be lawful to disclose information that may lead to the identification of the Discloser in a disclosure without the Discloser's consent if this is reasonably necessary for the purpose of investigating the matter (provided the information does not include the Discloser's identity and OLH Group takes all reasonable steps to reduce the risk that the discloser will be identified as a result of the information being disclosed).

Under the Whistleblower Protection Scheme, breaching the principal confidentiality protection regarding the Discloser's identity and information likely to lead to the identification of the Discloser is a criminal offence and those involved may be the subject of criminal, civil and disciplinary proceedings.

The OLH Group will ensure that any documents or electronic documents will be handled in accordance with the OLH Group's practises for secure record-keeping, and access to information relating to the disclosure will be limited to those directly involved with managing and/or investigating the disclosure or assisting those persons

In order to minimise the risk of a breach of confidentiality, where appropriate, action may be taken, including the partial redaction of reports, the use of appropriate language in communications, and the use of pseudonyms or non-identifying descriptors when referring to the Discloser. At the time of making a Qualifying Disclosure, Disclosers should alert Eligible Recipients to information in their disclosure that will or is likely to lead to their identification as the Discloser.

In practice, and despite the best efforts of the Discloser and the OLH Group, it is important to recognise that a Discloser's identity may still be ascertained if the Discloser has previously mentioned to other people that they are considering making a disclosure, the Discloser is one of a very small number of people with access to the information or the disclosure related to information that a Discloser has previously been told privately and in confidence.

Disclosers can lodge a complaint with the OLH Group about a breach of confidentiality and may also lodge a complaint with a regulatory body such as ASIC, APRA, or the ATO for investigation.

## 6.2 Detriment

Disclosers are protected under the Whistleblower Protection Scheme from victimisation and suffering any **"Detriment"** by reason of the Qualifying Disclosure. It is unlawful for a person to engage in conduct against another person that causes, or will cause, Detriment in circumstances where the person believes or suspects that the other person or any other person made, may have made, proposes to make or could make a Qualifying Disclosure.

Threats of Detriment are also unlawful. Such a threat could be express or implied, conditional or unconditional.

Detriment includes without limitation:

- a) dismissal of an employee;
- b) injury of an employee in his or her employment;
- c) alteration of an employee's position or duties to his or her disadvantage;
- d) discrimination between an employee and other employees;
- e) harassment or intimidation of a person;
- f) harm or injury to a person, including psychological harm;
- g) damage to a person's property, reputation, business or financial position; or
- h) any other damage to a person

Conduct that is not conduct that causes Detriment includes:

- a) administrative action that is reasonable for the purpose of protecting a Discloser from Detriment; and
- b) managing a Discloser's unsatisfactory work performance, in circumstances where such action is in line with the relevant OLH Group entity's performance management framework.

Employees of the OLH Group found to have engaged in conduct that may cause Detriment will be subject to disciplinary action. Any person that engages in conduct that may cause Detriment may also be subject to civil and criminal liability (including imprisonment) under the Whistleblower Protection Scheme.

If any person becomes aware of conduct that may cause Detriment occurring, they should report this to the Eligible Recipients.

Under the Whistleblower Protection Scheme, Courts have broad scope to make orders remedying a Detriment or threatened Detriment. These include injunctions, compensation orders (including against individual employees and their employer), reinstatement, exemplary damages and the making of apologies. For example, civil and criminal sanctions apply to breaches of the Whistleblower Protection Scheme in Australia.

Disclosers who make a protected disclosure may seek compensation and other remedies through the courts if:

- they suffer loss, damage or injury because of a disclosure; and
- the OLH Group failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

Disclosers should seek legal advice if they wish to seek compensation and other remedies through the courts

Disclosers may seek independent legal advice or contact regulatory bodies, such as ASIC, APRA or the ATO, if they believe they have suffered detriment.

### 6.3 Immunities

In Australia, a Discloser who makes a disclosure that qualifies for protection under the Whistleblower Protection Scheme will not be subject to criminal, civil and/or administrative liability (including disciplinary action) by the OLH Group and no contractual or other remedy or right may be enforced or exercised against the Discloser on the basis of the Qualifying Disclosure. However, that does not prevent the person being subject to civil, criminal or administrative liability because of the conduct of the person revealed by the Qualifying Disclosure.

Disclosers who make a protected disclosure have civil, criminal and administrative liability protection, which includes as follows:

- civil liability (e.g., any legal action against the Discloser for breach of an employment contract, duty of confidentiality or another contractual obligation);
- criminal liability (e.g., attempted prosecution of the Discloser for unlawfully releasing information, or other use of the disclosure against the Discloser in a prosecution (other than for making a false disclosure)); and
- administrative liability (e.g., disciplinary action for making the disclosure).

A Discloser can or may still qualify for protection even if the disclosure turns out to be incorrect.

### 6.4 Complaints

OLH takes its responsibilities under the Whistleblower Protection Scheme seriously. Where a Discloser believes that:

- an Eligible Recipient or other person involved in the receipt, handling or investigation of their Qualifying Disclosure has breached the requirements relating to the confidentiality of the Discloser's identity; or
- another person has engaged in conduct that has caused, is causing or will cause Detriment to either the Discloser or a third person, in circumstances where the person believes or suspects that the Discloser, or any other person made, may have made, proposed to make or could make a Qualifying Disclosure,

they may seek a review of the circumstances to determine whether a breach has occurred through the internal or external reporting portals. A Discloser may also raise such concerns directly with a member of the OLH Board.

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## 7. Support and Training

The Human Resources team will facilitate a yearly periodical attestation exercise in conjunction with the Code of Conduct to all employees,

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## 8. Other matters

### 8.1 Compliance

A breach of the protections provided under the Whistleblower Protection Scheme will be treated as a serious disciplinary matter.

The Company will treat all reports of Disclosable Matters seriously and endeavour to protect anyone who raises concerns in line with this Policy. However, false reports can have significant effects on the reputations of OLH employees and would also cause considerable waste of time and effort. A deliberately false disclosure under this Policy will be treated as a serious disciplinary matter, a consequence for which may include dismissal.

### 8.2 Terms and Conditions

This Policy does not form part of any contract of employment or contract of engagement and local laws and regulations in relation to the subject matter of this Policy may vary from time to time and employees are encouraged to be aware of relevant laws and regulations and not to solely rely on this Policy.

### 8.3 Applicability

This Whistleblower Policy is applicable to the OLH Group in all locations worldwide.

As the OLH Group operates in multiple countries, this Policy is subject to the laws that apply in those countries, which means that in some cases, disclosures made under this Policy may be handled differently according to legislation or regulation in that jurisdiction.

However, regardless of the applicable law, the OLH Group will at least apply the protections relating to “Confidentiality” and “Detriment” (refer to sections 6.1 and 6.2 above) to all Disclosers who make a Qualifying Disclosure in accordance with this Policy.

**8.4 Adoption of Policy and Board review**

This Policy was adopted by the Board on 23 January 2020 and took effect from 1 January 2020.

The Board will review this Policy periodically to check that it is operating effectively and to consider whether any changes are required to the Policy. The Company Secretary or People and Performance Manager will communicate any amendments to employees as appropriate.

This Policy is published on the OLH Group website and internally on the staff HRIS (Human Resources Information System).

Document Owner(s)	Chief Financial Officer People and Performance Manager
Policy Created	December 2019
Version Control	Version 1 – December 2019
Frequency of Policy Review	Annually
Approved by the Board	23 January 2020

## Annexure A – Contact details for Senior Management to whom Whistleblower disclosures can be made:

Name	Designation	Direct Telephone Number	Email
Mr. Richard Abela	Chief Executive Officer	(02) 4645 0701	<a href="mailto:richard.abela@oldfields.com.au">richard.abela@oldfields.com.au</a>
Mr. Alan Lee	Chief Financial Officer	(02) 4645 0702	<a href="mailto:alan.lee@oldfields.com.au">alan.lee@oldfields.com.au</a>
Mr John Kairuz	National People & Performance Manager	(02) 4645 0735	<a href="mailto:john.kairuz@oldfields.com.au">john.kairuz@oldfields.com.au</a>
Mr Jonathan Doy	Chairman – OLH Board		<a href="mailto:jonathan.doy@oldfields.com.au">jonathan.doy@oldfields.com.au</a>
Mr David Baird	Chairman – OLH Remuneration & Nomination Committee		<a href="mailto:david.baird@oldfields.com.au">david.baird@oldfields.com.au</a>

## Annexure B – Contact details of Stopline to whom Whistleblower complaints can be made:

<https://oldfields.stoplinereport.com/>