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1. Our commitment

The Alannah & Madeline Foundation (the Foundation) is committed to a culture of respect and ethical conduct in the way we work and relate to each other. We recognise the value of keeping the laws and standards that apply to us in our work and encourage everyone to report misconduct.

We will not tolerate corrupt, illegal or other undesirable conduct nor condone detrimental acts of anyone who intends to disclose or has disclosed misconduct.

2. Purpose of this policy & procedural document

The purpose of this policy and related procedures includes the following:

- to encourage disclosures of wrongdoing
- to help deter wrongdoing, in line with the Alannah & Madeline Foundation’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 Alannah & Madeline Foundation’s framework for receiving, handling and investigating disclosures
- to support the Alannah & Madeline Foundation Values and Code of Conduct
- to support the Alannah & Madeline Foundation’s long-term sustainability and reputation
- to meet the Alannah & Madeline Foundation’s legal and regulatory obligations
- to align with the ASX Corporate Governance Principles and Recommendations and relevant standards.

This policy and procedure document is a very important tool for helping the Alannah & Madeline Foundation to identify wrongdoing that may not be uncovered unless there is a safe and secure means for disclosing wrongdoing.

Nothing in this policy and procedure document is intended to change or take away any other protections which may be available at law.

3. Relationship to other policies

This policy and procedure document:

- forms a part of the Alannah & Madeline Foundation risk management system and corporate governance framework
- is one of the mechanisms in the Alannah & Madeline Foundation risk management tool kit for identifying wrongdoing
- is available to all employees as part of their employment information.

4. Every person’s responsibility

Every person to whom this policy and procedure document applies has a responsibility to:

- remain alert to misconduct
- report known or suspected misconduct in accordance with this policy
- act in a way that reduces, prevents or stops misconduct
- support (and not victimise) those who have made, or intend to make, a disclosure
- ensure the identity of the Discloser and the person/s who is/are the subject of the disclosure are kept confidential.
5. Definitions


“Protection Officer” means the person appointed by the Alannah & Madeline Foundation to support and protect a whistleblower, if necessary, from detrimental action.

“Whistleblower” means a person who makes a disclosure under this Policy. They may also be referred to as a “Discloser” within this Policy.

6. Who does this policy apply to?

This policy and related procedures applies to anyone who has or is working for the Foundation or doing something in connection with their work for the Foundation.

It includes past and current:

- Board members
- employees
- volunteers
- individuals who supply goods and services to the Alannah & Madeline Foundation and their employees
- work experience students
- commissioned agents and consultants
- a relative of an individual referred to above
- a dependent of an individual referred to above or of such an individual’s spouse

(collectively referred to as ‘Disclosers’).

7. Who may make a disclosure?

Any person defined as a Discloser in the paragraph above may make a disclosure under this policy and related procedures.

8. What misconduct should be disclosed?

If you have seen or have reasonable grounds to suspect misconduct, or an improper state of affairs or circumstances, concerning our organisation – you should report (disclose) it. Options for disclosure are set out in section 10.

For the report to be a protected report, one of the requirements is that the person making the report has reasonable grounds to suspect misconduct is occurring or has occurred. It is not possible to provide an exhaustive list of the activities which should be reported for the purpose of this policy and related procedures. Generally, misconduct includes any conduct which a Discloser has reasonable grounds to suspect:

a. is about misconduct or an improper state of affairs or circumstances concerning the Foundation
b. indicates that the Foundation or any of its officers or employees has engaged in conduct that:
   i. involves a breach of or is an offence against the Corporations Act, the ASIC Act, the Banking Act 1959 (Cth), the Financial Sector (Collection of Data) Act 2001, the Insurance Act 1973, the Life Insurance Act 1995, the National Consumer Credit Protection Act 1973, or the Superannuation Industry (Supervision) Act 1993, or regulations made under those laws
ii. is an offence against any other Commonwealth law that is punishable by imprisonment of 12 months or more
iii. indicates a significant risk to public safety or the stability of, or confidence in, the financial system, even if it does not involve breach of a particular law
iv. is indicative of systemic issues, dishonest or unethical behaviour or practices.

c. is about misconduct or an improper state of affairs or circumstances in relation to the tax affairs of the Foundation or an associated company which the Discloser considers may assist to perform the functions or duties in relation to the tax affairs of the Foundation
d. involves the deliberate concealment of information tending to show any of the matters listed above.

These matters are referred to as ‘Misconduct’ in this policy and procedure document.

Misconduct includes but is not limited to:

• illegal conduct, such as theft, dealing in, or use of, illicit drugs, violence or threatened violence, and criminal damage against property
• fraud, money laundering or misappropriation of funds
• offering or accepting a bribe
• financial irregularities
• failure to comply with, or breach of, legal or regulatory requirements
• engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made, or be planning to make, a disclosure
• information that indicates a significant risk to public safety or the stability of, or confidence in, the financial system is also a disclosable matter, even if it does not involve a breach of a particular law
• serious inappropriate or unethical conduct
• serious misuse of information
• bullying, discrimination, harassment or other serious unacceptable behaviour
• serious breach of the Foundation’s policies and procedures or the law
• substantial waste of company resources
• causing substantial financial or non-financial loss or detriment to the Foundation.

9. Personal work-related grievances

Personal work-related grievances are not types of misconduct which can be reported under this policy and related procedures and are not matters which provide specific whistleblower protections to the discloser under Australian law (although there may be protections under other laws). Personal work-related grievances relate to current or former employment and have implications for the discloser personally but do have significant implications for the organisation or do not relate to misconduct disclosable under this policy and related procedures.

Examples of personal work-related grievances include:

• an interpersonal conflict between employees
• a decision that does not involve a breach of workplace laws
• a decision relating to the employment, engagement, transfer or promotion of an employee or contractor
• a decision relating to the terms and conditions of employment or engagement of an employee or contractor
• a decision to suspend or terminate the employment or engagement of the employee or contractor, or to take disciplinary steps against the employee or contractor.
Matters that relate solely to personal work-related grievances should be internally raised using the Foundation’s Staff Consultation & Grievance Resolution – Policy & Procedures. However, sometimes, there are grievances which do qualify as protected disclosures, for example, if they are part of a problematic pattern or systemic issue within the organisation, will have a significant implication for the organisation, or if the grievance is bundled with illegal activity or another protected disclosure.

For any further clarification about what is a “personal work-related grievance” under this policy and related procedures, please speak to the People & Culture team.

10. How do I make a disclosure?

A disclosure may be made:

1. internally to our organisation to a Foundation Disclosure Officer (see section 10 a)
2. to the Foundation’s independent whistleblower service provider – Your Call – on 1300 790 228 or at https://www.yourcall.com.au/report (see section 10 b)
3. to certain external authorities and entities (see section 10 c).

a. Making a disclosure to our organisation

We support openness and teamwork. This policy and related procedures is not intended to replace our first obligation to resolve issues quickly and internally where appropriate. All reasonable attempts to resolve an issue should first be tried. You are encouraged to raise misconduct as early as possible with your People Leader, Organisation Leader or member of the Executive Team and to resolve misconduct informally and internally. However, you should be aware that for the whistleblowing protections to apply, your disclosure must be made to a Foundation Disclosure Officer, Your Call or certain other parties as specified in section 10 of this policy and procedure document.

For the whistleblower protections to apply, you are encouraged to make a report to one of the Foundation Disclosure Officers. Our Disclosure Officers are:

<table>
<thead>
<tr>
<th>Name and position</th>
<th>Location</th>
<th>Contact details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scott Gordon Chief Operating Officer</td>
<td>South Melbourne office</td>
<td>email: <a href="mailto:scott.gordon@amf.org.au">scott.gordon@amf.org.au</a></td>
</tr>
<tr>
<td>Linda Barry Deputy Chief Executive Officer</td>
<td>South Melbourne office</td>
<td>email: <a href="mailto:linda.barry@amf.org.au">linda.barry@amf.org.au</a></td>
</tr>
<tr>
<td>Sarah Davies Chief Executive Officer</td>
<td>South Melbourne office</td>
<td>email: <a href="mailto:sarah.davies@amf.org.au">sarah.davies@amf.org.au</a></td>
</tr>
</tbody>
</table>

Alternatively, you may make a report using our whistleblowing service, Your Call (see section 10b).

You can also make a disclosure to:

- an officer or Organisation Leader of the Foundation or related company
- an auditor, or a member of an audit team conducting an audit of the Foundation or related company
- an actuary of the Foundation or related company
b. Making a disclosure to independent whistleblower service provider – Your Call

If for any reason you do not feel safe or able to make a disclosure internally you may do so to independent whistleblower service provider, Your Call.

Your Call operates under a Service Agreement with the Foundation and acts as the intermediary, providing the means for a whistleblower to retain anonymity. Disclosures received by Your Call are reported to the Foundation in accordance with this policy and related procedures. Your Call also enables the Foundation to obtain further information if required and enables the whistleblower to receive updates from the Foundation.

This is done via the use of an online anonymous Message Board which the whistleblower will have access to after making a disclosure.

The Message Board allows you to:

- communicate with Your Call and/or the Alannah & Madeline Foundation without revealing your identity
- securely upload any relevant documentation and/or material that you wish to provide
- receive updates
- request support or report detrimental acts.

This option allows you to:

- remain completely anonymous if you wish
- identify yourself to Your Call only
- identify yourself to both Your Call and the Alannah & Madeline Foundation.

Your Call enables disclosures to be made anonymously and confidentially. Whilst we prefer whistleblowers to disclose their identity in order to facilitate an investigation, whistleblowers are not required to identify themselves and will not be named in any report to the Foundation unless they have consented to their identity being disclosed.

Your Call reporting options include:

  Available 24/7

- Telephone: 1300 790 228
  Available between 9am and 12am on recognised Australian national business days (AEST)

Online reports can be made via the website address listed above. Our organisation’s unique identifier code is: “AMF”.

In the event a disclosure received by Your Call relates to a Disclosure Officer, Your Call will exclude that Disclosure Officer from all communications when providing the disclosure to the Foundation. The Disclosure Officers who are not named in the disclosure will then receive and determine how the matter will be addressed or investigated as required. In the event that all Disclosure Officers are potentially involved in the matter, the disclosure will be referred to the Chair of the Foundation’s Board.

Your Call remains an independent intermediary at all times and will only communicate with those authorised within our organisation.
National Relay Service

If you are deaf, or have a hearing or speech impairment, you can contact Your Call online or through the National Relay Service. Simply choose your contact method at

www.relayservice.gov.au and request Your Call’s hotline 1300 790 228.

Reporting to regulators

You may also make a disclosure to:

- ASIC:
  https://compliance.asic.gov.au/#/form/583b77dc397bbbc319837ea2a/app/5de48f4c8c212107b4c13f22
- APRA:
- a Commonwealth authority prescribed for the purposes of Section 1317AA (1)

Concerning disclosures made to legal practitioner

If you make a disclosure to a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of Part 9.4 of the Act (which includes the whistleblower protections and confidentiality of a whistleblower’s identity) the disclosure will be protected under the Act.

Concerning public interest disclosures

You may make a disclosure in the public interest to a member of the Parliament of the Commonwealth, the Parliament of a State or the legislature of a Territory or a journalist if:

1. you have previously made a disclosure of that misconduct; and
2. at least 90 days have passed since the previous disclosure was made; and
3. you do not have reasonable grounds to believe that action is being, or has been, taken to address the misconduct to which the previous disclosure related; and
4. you have reasonable grounds to believe that making a further disclosure of the misconduct would be in the public interest; and
5. after the end of the 90-day period you give the person to whom you made the previous disclosure a written notification that:
   a. includes sufficient information to identify the previous disclosure; and
6. state that you intend to make a public interest disclosure; and
7. the public interest disclosure is made to:
   a. a member of the Parliament of the Commonwealth, the Parliament of a State or the legislature of a Territory; or
   b. a journalist; and
8. the extent of the information disclosed in the public interest disclosure is no greater than is necessary to inform the recipient of the misconduct or the improper state of affairs or circumstances.

Concerning emergency disclosures

You may make also make an emergency disclosure to a member of the Parliament of the Commonwealth, the Parliament of a State or the legislature of a Territory or a journalist if:
1. you previously made a disclosure that qualifies for protection under the Act (Part 9.4 under subsection 1317AA (1); and
2. you have 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; and
3. you give the body to which the previous disclosure was made a written notification that:
4. includes sufficient information to identify the previous disclosure; and
5. state that you intend to make an emergency disclosure; and
6. the emergency disclosure is made to:
   a. a member of the Parliament of the Commonwealth, the Parliament of a State or the legislature of a Territory; or
   b. a journalist; and
7. the extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the recipient of the substantial and imminent danger.
8. It is important to understand that a report may only be made to a journalist or a parliamentarian in the circumstances described above. You should seek independent legal advice before making a public interest disclosure or an emergency disclosure to a member of Parliament or a journalist.

11. Where can I get information and advice?

If you need information and advice about making a disclosure or the support and protection available you may discuss the matter in confidence with your People Leader, your Organisation Leader, a member of the Executive Team or a member of the People & Culture team.

Note: In the event you do not formally make a disclosure we may nevertheless be compelled to act on the information provided during the discussion if the information reasonably suggests misconduct has or may occur.

12. Protections under the law

To qualify for protection as a whistleblower under the Act and to receive specific legal rights you must meet all three of the following requirements:

- you must be an eligible discloser (as defined above)
- you disclose reportable conduct subject to the work grievance exemptions (as defined above)
- you make the disclosure through an appropriate reporting channel and recipient (as defined above).

13. Do I have to disclose my identity?

There is no requirement for a whistleblower to identify themselves in order for a disclosure to qualify for protection under the Act. A discloser can:

- choose to remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised, and
- refuse to answer questions that they feel could reveal their identity at any time, including during follow-up conversations.

The Alannah & Madeline Foundation encourages disclosers who wish to remain anonymous to maintain ongoing two-way communication so that the Alannah & Madeline Foundation can ask follow-up questions or provide feedback.
If you want to remain anonymous, we recommend that you use the Your Call external whistleblowing service to make your disclosure and maintain ongoing communication.

14. Will my identity be treated as confidential?

If you make a whistleblowing report, your disclosure will be treated as confidential in accordance with legal requirements. It is illegal for a person to disclose your identity or information that is likely to lead to identification of your identity, unless:

- you give your consent;
- the disclosure is required by law; or
- the disclosure is made to:
  - a professional legal advisor (including the Foundation's legal team) for the purpose of obtaining legal advice or representation; or
  - authorised regulatory bodies, such as ASIC, APRA or a member of the Australian Federal Police.

However, a person who is dealing with a whistleblowing report may disclose information that is reasonably necessary for the purposes of investigating the report. If this happens, reasonable steps will be taken to reduce the risk that you will be identified as a result of the report (for example by removing your personal information or other details that are likely to identify you).

The Alannah & Madeline Foundation has in place the following measures and mechanisms for protection the confidentiality of a discloser’s identity.

Reducing the risk that the discloser will be identified from the information contained in a disclosure:

- all personal information or reference to the discloser witnessing an event will be redacted
- the discloser will be referred to in a gender-neutral context
- where possible, the disposer will be contacted to help identify certain aspects of their disclosure that could inadvertently identify them
- disclosures will be handled and investigated by qualified staff.

Secure record-keeping and information-sharing processes:

- all paper and electronic documents and other materials relating to disclosures will be stored securely
- access to all information relating to a disclosure will be limited to those directly involved in managing and investigating the disclosure
- only a restricted number of people who are directly involved in handling and investigating a disclosure will be made aware of a discloser’s identity (subject to the discloser’s consent) or information that is likely to lead to the identification of the discloser
- each person who is involved in handling and investigating a disclosure will be reminded about the confidentiality requirements, including that an unauthorised disclosure of a discloser’s identity may be a criminal offence.

An unauthorised disclosure of the identity of a whistleblower, or information that is likely to lead to the identification of the whistleblower where the information was obtained because of the disclosure, will be regarded as a disciplinary matter and will be dealt with in accordance with the Alannah & Madeline Foundation’s disciplinary procedures. It is also an offence / contravention under the Act which carries serious penalties for individuals and companies. If you are a discloser of a reportable matter and your identity is revealed without your consent you may also be eligible to claim compensation and remedies under the Act.
As a discloser you should be aware that in practice, people may be able to guess your identity if:

- you have previously mentioned to other people that you are considering making a disclosure
- you are one of a very small number of people with access to the information
- your disclosure relates to information that you have previously been told privately and in confidence.

You can lodge a complaint with us if you believe a breach of your confidentiality as a discloser has occurred by contacting our Disclosure Officers or by contacting Your Call. You can also lodge a complaint with a regulator including ASIC, APRA or the ATO if you believe a breach of your confidentiality as a discloser has occurred.

15. **Protection against detrimental conduct**

We will do everything reasonably possible to support and protect anyone who:

- intends to or actually makes a disclosure
- is mentioned in the disclosure
- acts as a witness
- otherwise assists with the investigation and resolution of the disclosure from detrimental conduct, acts and omissions.

Examples of detrimental conduct, acts and omissions include but are not limited to:

- dismissal of an employee
- alteration of an employee’s position or duties to his or her disadvantage
- harassment or intimidation of a person
- harm or injury to a person, including psychological harm
- damage to a person’s reputation.

Examples of actions that are not detrimental conduct and omissions include but are not limited to:

- administrative action that is reasonable for the purpose of protecting a discloser from detriment (eg. moving a discloser who has made a disclosure about their immediate work area to another office to prevent them from detriment)
- managing a discloser’s unsatisfactory work performance, if the action is in line with the entity’s performance management framework.

The Alannah & Madeline Foundation has in place the following measures and mechanisms to protect disclosers from detriment:

- processes for assessing the risk of detriment against a discloser and other persons (eg. other staff who might be suspected to have made a disclosure), which will commence as soon as possible after receiving a disclosure
- support services (including an internal Protection Officer and an Employee Assistance Program) that are available to disclosers
- strategies to help a discloser minimise and manage stress, time or performance impacts, or other challenges resulting from the disclosure or its investigation
- actions for protecting a discloser from risk of detriment - for example, the Foundation may allow the discloser to perform their duties from another location, reassign the discloser to another role at the same level, make other modifications to the discloser’s workplace or the way they perform their work duties, or reassign or relocate other staff involved in the disclosable matter
- interventions for protecting a discloser if detriment has already occurred - for example, we may investigate and address the detrimental conduct, such as by taking disciplinary action, or we may allow the discloser to take extended leave, develop a career development plan for the discloser that includes new training and career opportunities, or offer compensation or other remedies.
If a discloser believes they are at risk of detriment, or have suffered some detriment, as a result of taking any action under this policy and related procedures, they may contact any one of the Disclosure Officers listed in paragraph 10 of this policy and procedure document, or to the Chair of the Alannah & Madeline Foundation’s Board.

We will thoroughly investigate reports of detrimental acts. If proven, those who have victimised another will be subject to management action including disciplinary action up to dismissal. It is also an offence / contravention under the Act which carries serious penalties for individuals and companies. If you are a discloser of a reportable matter and you suffer detrimental acts or detrimental treatment, you may also be eligible to claim compensation and remedies under the Act. Nothing in this policy and related procedures is intended to change or take away any other protections which may be available at law.

16. Assessing and controlling the risk of detriment

The Alannah & Madeline Foundation has established processes for assessing and controlling the risk of detriment and keeps records of its risk assessments and risk control plans.

Steps involved in identifying, analysing, evaluating, controlling and monitoring the risk at the Foundation are detailed in the Foundation’s Risk Management Framework.

17. Support and protection

The Alannah & Madeline Foundation has a Protection Officer to arrange or coordinate support and protection for anyone who has or is in the process of making a disclosure: this Officer is the People & Culture Coordinator.

The discloser can contact the Head of People & Culture or the People & Culture Coordinator to discuss how the Protection Officer may be able to provide support and protection.

The Protection Officer is appointed by the Alannah & Madeline Foundation to:

- assess the immediate welfare and protection needs of a whistleblower
- safeguard the interests of a whistleblower in accordance with this policy and procedure document and the law
- address any issues or concerns of detrimental acts / detrimental treatment.

18. What will the Alannah & Madeline Foundation do with the disclosure?

The Disclosure Officer has been appointed by the Alannah & Madeline Foundation to receive the disclosure directly from you (if you make an internal disclosure to our organisation) or from Your Call (if you make an external disclosure to Your Call).

The Disclosure Officer will:

- carefully assess the information provided to decide the best action to take, including whether an investigation is required, to determine whether the misconduct is proven or not proven
- keep the information provided in a confidential and secure system
- coordinate and oversee the investigation where an investigator has been appointed
- appoint a Protection Officer to support and protect the whistleblower, if necessary, from detrimental acts
- advise the whistleblower (through Your Call where anonymity is requested) of the progress of the matter to the extent it is legally permissible and appropriate to do so
- take all reasonable steps to ensure fair treatment for and to ensure the identity of the whistleblower and the person/s who is the subject of the disclosure are kept confidential. An employee who is the subject of a disclosure will be advised about the subject matter of the disclosure as and when required by principles of natural justice and procedural fairness and prior to
any actions being taken. An employee who is the subject of a disclosure may contact the Alannah & Madeline Foundation’s support services by contacting our Employee Assistance Provider LifeWorks on 1300 361 008.

19. Investigation of the disclosure

The Disclosure Officer will carefully assess and use the information provided in the disclosure to decide the best action to take, including whether an investigation is required and, if so, determine the appropriate investigation process, including:

• the nature and scope of the investigation
• who will conduct the investigation and whether that person should be external to the Alannah & Madeline Foundation
• the nature of any technical, financial or legal advice that may be required
• a timeframe for the investigation (having regard to the level of risk).

20. How will the investigation be conducted?

The investigation will be conducted in a constructive, impartial and lawful way according to the principles of natural justice and procedural fairness and all efforts will made to meet investigation best practices.

The investigator will:

• gather information, material and documentation concerning the disclosure as quickly as possible (this may involve taking steps to protect or preserve documents, materials and equipment)
• focus on the substance of the disclosure and will not focus on the motives of the discloser
• not assume that disclosures about conduct or behaviour that appear to have had a personal impact on a discloser are somehow less serious. The discloser’s experience may indicate a larger or systemic issue
• take a statement or record of interview and or tape formal interviews with witnesses as required (where the whistleblower wishes to remain anonymous and does not wish to make a statement they will not be asked to do so)
• keep information gathered in the investigation securely
• take all reasonable steps to protect the identity of the whistleblower. Where disclosure of the identity of the whistleblower cannot be avoided due to the nature of the allegations, the investigator will first gain the consent of the whistleblower before providing identifying information to any additional persons
• complete the investigation and provide a report of their findings as soon as is reasonably practical.

21. Investigator’s report

At the conclusion of the investigation, the investigator will provide a written report to one of the Disclosure Officers referred to in paragraph 10.1 including:

• a finding of all relevant facts
• whether the disclosure is proven, not proven or otherwise
• recommendation/s, when requested to do so, as to any action that may be taken in respect of the findings.

The Alannah & Madeline Foundation will use the report to determine the action (if any) to be taken including disciplinary action. The findings will be communicated to the relevant parties involved to the extent that it is legally permissible and appropriate to do so.
22. Will the whistleblower be kept informed?

Subject to privacy and confidentiality requirements the whistleblower will be kept informed of:

- when the investigation process has begun
- relevant progress of the investigation
- the outcome of the investigation

to the extent that it is legally permissible and appropriate to do so.

23. What happens if the misconduct is proven?

If the misconduct is proven the Alannah & Madeline Foundation will decide what action to take including disciplinary action up to dismissal. The disciplinary action will depend on the severity, nature and circumstance of the misconduct.

24. Avenues for review

A discloser may request a review of the investigation findings if the discloser is not satisfied with the outcome. The review will be conducted by an officer who is not involved in handling and investigating disclosures and the review findings will be shared with the Alannah & Madeline Foundation’s Board or Audit, Finance & Business Risk Committee.

The Alannah & Madeline Foundation is not obliged to reopen an investigation if it finds that the investigation was conducted properly, or new information is either not available or would not change the findings of the investigation.

25. What immunities are available to the whistleblower?

We want you to speak up against misconduct. Anyone who makes a disclosure:

- with reasonable grounds for suspecting misconduct has or may occur, and
- has not engaged in serious misconduct or illegal conduct relating to the disclosure

will be provided with immunity from disciplinary action.

If you make a disclosure that qualifies for protection under the Act:

- you are not subject to any civil, criminal or administrative liability (including disciplinary action) for making the disclosure
- no contractual or other remedy may be enforced, and no contractual or other right may be exercised, against you on the basis of the disclosure
- the information is not admissible in evidence against the whistleblower in criminal proceedings or in proceedings for the imposition of a penalty, other than proceedings in respect of the falsity of the information.

Note: Except as provided for by the Act it does not prevent a whistleblower being subject to any civil, criminal or administrative liability for conduct of the whistleblower that is revealed by the disclosure.

26. What are the consequences of making a false disclosure?

Anyone who makes a disclosure knowing it to be false or misleading may be subject to disciplinary action, including dismissal. The disciplinary action will depend on the severity, nature and circumstance of the false disclosure.
The Alannah & Madeline Foundation however does not wish to deter staff from making disclosures. In cases where disclosers have some information leading to a suspicion, but not all the details, staff are encouraged to speak up and report the misconduct and will not face disciplinary action in those circumstances.

27. How will this policy and related procedures be made available to employees and officers of the Alannah & Madeline Foundation?

The Alannah & Madeline Foundation makes the policy and related procedures available to employees and officers by:

- holding staff briefing sessions
- keeping the policy and related procedures available to all staff at S/AMF/Policies & Procedures
- posting the policy and related procedures on staff noticeboards
- providing awareness of the policy and related procedures during staff induction processes.

28. Training & education

The People & Culture team will be responsible for conducting upfront and ongoing education and training on the Whistleblower – Policy & Procedures to all staff.

29. Alannah & Madeline Foundation Board oversight

The Alannah & Madeline Foundation’s Board (either directly or through its Audit, Finance & Business Risk Committee) will monitor the whistleblower management system to ensure that the broader trends, themes and/or emerging risks highlighted by the disclosures made under its policy and procedures are addressed and mitigated as part of its risk management and corporate governance.

30. Review of this policy & related procedures

The Chief Operating Officer will monitor and review this policy and associated processes and procedures to ensure it meets its objectives.

Any amendments to this policy and related procedures shall be made known to employees and officers of our organisation by posting an updated version of the policy on the Alannah & Madeline Foundation’s intranet and website and providing training when necessary.
Document management

Select from –

- Document creation
- Deep dive content review
- Content update
- Proof / format review

<table>
<thead>
<tr>
<th>Updated</th>
<th>Review date</th>
<th>Name &amp; Position</th>
<th>Update/s made</th>
<th>Document owned by</th>
<th>Approved by</th>
<th>Update to Policy Reg</th>
</tr>
</thead>
<tbody>
<tr>
<td>February 2020</td>
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