

## Group Whistle Blower Policy

To ensure high standards of professional and ethical workplace conduct and practices, Buildcorp believes it is vital our employees and contractors – and their relatives, spouses, dependents and associates – can raise genuine concerns about conduct, activities or practices without fear of reprisal.

### Objectives

This policy provides the basis for:

- ▶ Encouraging potential whistle blowers to make legal, emergency and public interest disclosures
- ▶ Giving whistle blowers both legal and practical protection
- ▶ Ensuring individuals mentioned in a disclosure are treated fairly

### Commitments

To achieve these goals, our policy is to:

- ▶ Encourage those witnessing illegal conduct, fraud, money laundering, bribery, compliance breaches or threatening behaviour to whistle blowers to disclose these issues to a Buildcorp officer, senior manager or auditor so we can address wrongdoing as early as possible
- ▶ Handle disclosures confidentially and determine whether there is sufficient evidence to substantiate or refute the matters reported
- ▶ Appoint an officer to manage investigations, which may include conducting interviews, collating and assessing evidence, preparing reports and reporting to relevant entities.
- ▶ Undertake investigations objectively, fairly and independently
- ▶ Not reveal the identity of a discloser, or information likely to identify them, without their consent – except, where necessary, in an ASIC, APRA or Australian Federal Police matter.
- ▶ Protect disclosers from detrimental acts or omissions in the workplace and from civil, criminal, and administrative liability in relation to their disclosure
- ▶ Notify the individual who is the subject of the disclosure of any adverse findings against them
- ▶ Ensure the policy and its procedures are easily accessible by posting them on Buildcorp's website and intranet and, on request, providing them by email to any employee or contractor

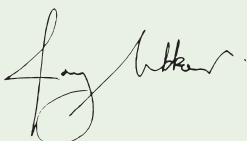
### Responsibility and Accountability

The senior management group maintains overall responsibility for the whistle blower policy. The Human Resources Department is responsible for managing allegations appropriately and ensuring all staff are aware of the whistle blower policy and their obligations, responsibilities and rights under it.

Buildcorp managers are responsible for understanding and being committed to the principles and legislation relating to the whistle blower policy. They are required to actively encourage employees and contractors to speak up if they see behaviours that violate Buildcorp's policies.

Buildcorp employees and contractors are responsible for reporting matters of concern to the Group People and Culture Manager.

This policy will be reviewed at least annually and updated as required to take legislative changes into account.



**Tony Sukkar AM**  
Group Managing Director  
March 2020