



Consolidated Food Co.

# Whistle Blower Policy & Procedure

Version 01 | July 2022





## Whistle Blowing

### Introduction & Purpose

We are committed to the highest standards of conduct and ethical behaviour in all our business activities and to promoting and supporting a culture of honest and ethical behaviour, corporate compliance and good corporate governance.

To foster this standard of behaviour, we have implemented a whistleblowing policy through our parent company Competitive Foods Australia, to encourage staff and external partners who have knowledge of, or reasonable suspicions of, any incident or improper conduct to report the matter through the appropriate channels at their earliest opportunity.

#### **The purpose of this whistle-blower policy is to:**

- Promote a culture of responsibility in reporting any suspected or actual misconduct or improper state-of-affairs or circumstances within Consolidated Food Co (CFC);
- Explain how to make a report about improper conduct;
- Outline the protections available for those who make a report;
- Outline CFC's processes for responding to reports; and
- Promote a workplace environment in which everyone feels safe, supported and encouraged to report improper conduct.

### Protections

Any protected disclosure made under this policy is confidential and may be made anonymously by the person making the report if they wish to protect their identity. The only exception to this is if a disclosure is required by law (for example, in a police investigation).

Therefore, unless consent is provided, the identity of an individual or individuals participating in the process will not be included in any personnel file or performance review. The report and the investigation in relation to the matters raised in the disclosure will not be provided to anyone except those persons actively involved in the investigation.

It is a criminal offense to victimize a whistle-blower because of a protected disclosure and if a whistle-blower suffers damage/detriment because of such victimization, the whistle-blower can claim compensation for that damage from the offender through the court system.



## Whistle Blowing

### Examples of Wrongdoings

**A wrongdoing may include:**

- Any breach of the Company's policies (including the Code of Conduct);
- Corrupt behaviour, including soliciting, accepting or offering a bribe;
- Dishonest, unethical or fraudulent activity;
- Improper behaviour relating to accounting, accounting controls or audit matters;
- Theft or fraud relating to the Company's assets, including intellectual property, or use of such property other than for the benefit of the Company;
- Breach of financial services laws;
- Serious breach of other Commonwealth or State laws;
- Significant mismanagement or waste of funds or resources;
- Abuse of authority related to the workplace;
- Serious harm to public health, safety or environment or the health and safety of any CFC employee or contractor; or
- Action taken against, or harm suffered by, someone as a result of making a report under this policy.

### Important Exclusions

This policy does not apply, nor provide whistle-blower protection, if the matter raised by the disclosure is a personal work-related grievance about a personal situation. This policy is primarily concerned with persons raising concerns about wrongdoings relating to CFC itself.

Examples of grievances that may be personal work-related grievances and therefore are not protected, are as follows:

- An interpersonal conflict between the employee and another employee;
- A decision relating to the engagement, transfer or promotion of the employee;
- A decision relating to the terms and conditions of engagement of the employee; or,
- A decision to suspend or terminate the engagement of the employee, or otherwise to discipline the employee.

If you are not sure about whether a particular concern should be raised under this Whistle-blower Policy or under the Grievances Policy or both policies, we encourage you to raise your concerns under this policy and the Chief People Officer will assist you to decide how the concern should be dealt with.



## Whistle Blowing

### How to Make a Protected Disclosure

Five criteria apply to how you can make a disclosure:

1. You must be a current and/or former director, officer (e.g., Director), associate, employee, supplier, distributor, and in some instances your spouse, child and dependant can make a disclosure;
2. You must make the disclosure to an officer (e.g., Director) or senior manager of the Company, the Company's auditors or another person authorized by the Company. This may include the individual's managers or supervisors, but only if the discloser is comfortable doing so;
3. The disclosure can remain anonymous, except as may be required by law, but the person can consent to provide their details;
4. You must have reasonable grounds to suspect that the information you are disclosing concerns a wrongdoing; and,
5. A disclosure excludes personal work-related grievances e.g., interpersonal conflict, termination of employment or disciplinary matters, etc.

If you do not feel comfortable making a Protected Disclosure to an officer or senior manager, you can also make a Protected Disclosure via the Competitive Foods Australia Whistle-blower Hotline or Webform service, managed by ER Strategies.

ER Strategies is a third-party organisation which operates and monitors an independent and confidential whistle-blower service for persons to which this policy applies.

Team members, suppliers, contractors, consultants, employees of contractors and anyone covered by this Policy may use the hotline or webform managed by ER Strategies to report an Improper Conduct.



## Whistle Blowing

### Whistler-Blower Hotline & Webform

- When accessing the Hotline or Webform to make a Protected Disclosure, you may make a confidential report or choose to disclose your identity, it is your choice.
- If you elect to remain anonymous, ER Strategies call takers for the CFC Whistle-blower Hotline will follow confidentiality protocols.
- You can contact the hotline 24/7 via the available online webform, or during business hours (AEST/AEDT) Monday to Friday via the phone service.
- An answering service will be available outside of the hours in which the phone lines are available, and if you choose to leave a contact number, a representative from the Hotline will call you back on the next working day.

#### Whistle-blower Hotline:

**1300 508 544**

#### Whistle-blower Webform:

<https://erstrategies.com.au/competitive-foods-whistleblower-online-disclosure-form/>



## Whistle Blowing

### What Happens Next

Any complaint made under this policy is confidential and may be made anonymously. Unless consent is provided no details of your participation in this process will be included in your personnel file or performance review. The report will not be disclosed to anyone except those that are actively involved in investigating the matters raised in the report.

CFC will take any required action in response to a report resulting from the investigation and explain what action will be taken, or that no action will be taken, and why. All matters raised will be treated in a secure and sensitive way with appropriate confidentiality but not all disclosures will proceed to investigation. All investigations will be conducted in a manner that is objective and affords procedural fairness. A matter will be investigated by an independent person to avoid any conflict of interest. Depending on the matters being investigated, a relevant report may be required to authorities.

### Public Interest and Emergency

CFC will investigate the disclosure as soon as practicable and take measures it considers necessary to address the matters you have raised. The Company will ensure you are informed of the outcome of its investigation. If you have reason to believe that the Company has not responded appropriately to the disclosure within 90 days, you have a right to make a 'public interest disclosure' where you believe it is in the public interest to do so or that there is substantial and imminent danger to a person's health or safety.

In this case, you are first obliged to advise the Company that you intend to make such a public interest disclosure. The further disclosure must be made to a member of parliament or to a journalist and must be no greater than is necessary to inform them of the wrongdoing or substantial or imminent danger to a person.

### What Happens if I am Mistaken?

If you raise a genuine concern under this policy, you will not be at risk of losing your job, nor will you suffer any form of detrimental action as a result. As long as you are acting in good faith and in accordance with this policy, it does not matter if you are mistaken. However, if you make a report that is misleading, it may damage the career prospects and reputation of anyone who is the subject of your allegations.