

BlueCHP Whistleblower Policy

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1. Policy Brief and Purpose

BlueCHP Limited ACN 128 582 383 (“BlueCHP”) (the “Company”) is committed to high standards of behaviour and conduct in its business activities and encourages the reporting of behaviour which fails to meet this standard. This policy has been adopted to provide a safe and confidential environment where such concerns can be raised by whistleblowers without fear of reprisal or detrimental treatment.

The Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 (“Act”) aims to encourage ethical whistleblowing and discourage white-collar crime while holding employers accountable for protecting eligible whistleblowers.

This policy sets out:

- Who is entitled to protection as a whistleblower under this policy (“Eligible Whistleblower”);
- The protections whistleblowers are entitled to under this policy (“Whistleblower Protections”);
- The reporting of certain conduct by a whistleblower (“Reportable Conduct”); and
- How disclosures made by whistleblowers in accordance with this policy will be handled by BlueCHP.

This policy applies to BlueCHP and to all entities in the BlueCHP Limited group and is available on our website (www.bluechp.com.au).

2. Who is a whistleblower?

For the purpose of this policy, a whistleblower is a current or former:

- Director, manager or employee; or
- Contractor, consultant, supplier, service provider or associate (or their employees or subcontractors); or
- Any relative, dependent or spouse (includes a de facto partner) of any individual referred to above, who makes or attempts to make a disclosure, on reasonable grounds, about:
 - conduct that is contrary to a BlueCHP Code of Conduct;
 - an improper state of affairs; or
 - a breach of the legislation set out in the Corporations Act 2001 (Cth).

For example, this could include conduct by BlueCHP, a director, officer or employee of BlueCHP, involving:

- Conduct that represents a danger to the public;
- Fraud, corruption or bribery;
- Money laundering or misappropriation of funds;
- Conduct which is detrimental to BlueCHP and could cause financial or non-financial loss;
- Contravention of any law administered by ASIC* or ACNC*;
- Offences punishable by 12 months imprisonment or more; or
- Conduct that represents a danger to the public.

However, the protections will not extend to disclosures about personal employment or workplace grievances such as interpersonal conflicts, transfer, promotion, or disciplinary decisions.

3. To Whom Should I Disclose?

Only reports about disclosable matters made to an eligible recipient ("Eligible Recipient"), or another individual recognised by whistleblower legislation as being able to receive such a report, attract protection under the whistleblowing legislation.

For the purposes of this policy, BlueCHP's nominated Eligible Recipients are:

- The CEO or the Company Secretary.

The contact details of the Eligible Recipients and the procedure to make a report are provided in **Appendix 1**.

Whistleblowing legislation states that reports about disclosable matters made to the following people will also attract protection:

- ASIC*, APRA*, the Commissioner of Taxation, members of the Australian Federal Police and other prescribed external agencies;
- Legal practitioners, for the purpose of obtaining legal advice and representation;
- Other external parties authorised by BlueCHP from time to time; and
- Journalists or Members of Parliament, but only in relation to public interest or emergency disclosures. A whistleblower who intends to make such a disclosure should seek independent legal advice before doing so.

4. Confidentiality and Anonymity

The identity of the whistleblower or information disclosed that could lead to their identification, will be treated in strict confidence and will not be shared unless:

- The Whistleblower has provided prior consent in writing; or
- We are compelled by law to do so; or
- We consider it appropriate to make a disclosure to a regulator under legislation.

We will comply with all requests for anonymity (subject to legal requirements) and make best endeavours to investigate the disclosure. There may however be practical limitations if a whistleblower does not agree to share their disclosure or identity.

5. Investigation Process

As part of that process, the Eligible Recipient will pass the disclosure to a member or members of the investigation team. The members of the investigation team in each case will depend upon the nature of the disclosable matter, but will likely be made up of a combination of the following people:

- Personnel from Compliance, Governance, Operations.

Once the investigation team has received the report that raises the disclosable matter, they will undertake an investigation in accordance with BlueCHP's standard practice, which will ordinarily include the following steps:

- Speaking to the whistleblower to obtain more information (if possible);
- Reaching a decision as to who will form the investigation team and conduct the investigation;
- Choosing a lead investigator;
- Informing the person or group of individuals to whom the disclosable matter relates, that a report has been received and is being investigated;
- Ascertaining whether there are any potential witnesses who should be interviewed and speaking to those witnesses (if any);
- Accessing and reviewing relevant material through mailboxes, historic documents, records, communications and the like; reviewing expenses, purchase orders, contracts and other data;
- Reaching findings as to whether the allegations raised by the disclosure are substantiated; and

- Preparing a report to document the outcomes of the investigation. The outcome of the investigation must be reported to the Board or its delegated board committee and may be reported to the whistleblower and any persons affected as the lead investigator considers appropriate.

The eligible whistleblower will be kept informed of the progress and the outcome of the investigation, to the extent possible, having regard to BlueCHP's policies and duties.

6. Whistleblower Protections

Whistleblowers have statutory protections under the Act, in addition to the protections provided by the Company under this Policy. Protections under the Act may include identity protection, protection from detrimental acts or omissions, compensation and remedies and liability protections. The Company will ensure fair treatment of whistleblowers and does not condone any form of reprisal (disciplinary or retaliatory) being taken against anyone for raising or helping to address a concern. The Company will take all reasonable steps to protect whistleblowers from such retaliation.

The Company will ensure fair treatment of its employees who make a Reportable Conduct disclosure or who are the subject of a disclosure by following Clause 4. 'Confidentiality and Anonymity'.

Compensation, Other Legal Remedies and Penalties

A person who participates in a whistleblower investigation may be entitled to seek compensation and other legal remedies if they suffer loss, damage or injury as a result of the disclosure and reasonable steps were not taken to prevent detrimental conduct from occurring.

7. Relevant Legislation

From 1 July 2019, Australia has a new whistleblower protection regime covering the corporate, financial and tax sectors.

The laws regarding whistleblower disclosures and protections are set out in the following whistleblower legislation:

- Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 (Cth); and
- Treasury Laws Amendment (Strengthening Corporate and Financial Sector Penalties) Act 2019 (Cth).
- The Act makes significant changes to the existing Corporations Act 2001 (Cth) and the Taxation Administration Act 1953 (Cth).

8. Next Review

The next review will be conducted in June 2026.

Footnote:

* ASIC (Australian Securities & Investments Commission)

* ACNC (The Australian Charities and Not-for-profits Commission)

* APRA (Australian Prudential Regulation Authority)

Appendix 1 – Current Officials for this Policy

Eligible Recipients	Chief Executive Officer or Company Secretary BlueCHP Limited PO Box 315x LEUMEAH NSW 2560
Procedure	A report must be made in writing to one of the above Eligible Recipients and sent to PO Box 315x LEUMEAH NSW 2560