

WHISTLEBLOWER POLICY

Hunter Mason is committed to ethical, accountable, and transparent conduct. In line with the Corporations Act 2001 (Cth), this policy outlines how eligible individuals can safely report concerns related to misconduct or an improper state of affairs without fear of retaliation.

Who This Policy Applies To

- Employees/workers
- Directors or officers
- Contractors and suppliers (and their employees)
- Associates or consultants
- Relative, dependant, spouse, or dependant of a spouse of any of the above.

The protections in this policy will also apply to any person who has made a disclosure of information relating to the Employer to a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to whistleblowing protection laws.

What is Reportable Conduct?

Reportable Conduct includes, but is not limited to:

- Dishonest or fraudulent behaviour
- Corrupt, unlawful or unethical practices
- Misleading financial reporting
- Unsafe work practices
- Oppressive or negligent conduct
- Breaches of environmental or public safety obligations
- Conduct causing reputational damage or financial loss

Note: Personal workplace grievances (e.g. interpersonal disputes, performance reviews) are generally excluded unless they involve victimisation for whistleblowing.

Reporting Mechanism

Disclosures may be made:

- To a relevant Senior Manager
- To an Eligible Recipient, which includes:
 - A Director, Officer, Senior Manager, or
 - An appointed external auditor or actuary

Reports can be made in person, by phone, or in writing. The discloser must advise they are making a protected disclosure under this policy.

Investigation Process

Upon receipt of a report, Hunter Mason will:

- Assess whether the matter qualifies as Reportable Conduct
- Initiate an internal or external investigation, if applicable
- Ensure investigations are objective, confidential, and appropriate to the nature of the allegation
- Provide progress updates to the discloser (subject to privacy constraints)

Anonymous disclosures are permitted and respected. Where identifying details are essential to the investigation, Hunter Mason will take all reasonable steps to preserve anonymity.

Confidentiality

Hunter Mason will maintain confidentiality to the maximum extent possible. Disclosure of a discloser's identity will only occur:

- With the discloser's consent
- Where required by law (e.g. disclosure to ASIC, APRA, AFP)
- To a legal practitioner for legal advice

All records related to whistleblowing investigations will be stored securely.

Protections Against Detriment

A Discloser will not be subject to any civil, criminal or disciplinary action for making a report that is covered by this policy, or for participating in any subsequent investigation by the Employer.

The Employer will not tolerate any retaliation against any Discloser. Retaliation occurs where a person causes or threatens detrimental treatment to another person as a result of making a report of Reportable Conduct. Detrimental treatment may include, but is not limited to:

- dismissal
- injury of an employee in their employment
- alteration of an employee's position or duties to their disadvantage
- discrimination between an employee and other employees of the same employer
- harassment or intimidation of a person
- damage to a person's property
- damage to a person's reputation
- damage to a person's business or financial position, or
- any other damage to a person.

Detrimental treatment by any employee will be deemed a serious breach of this policy and may result in disciplinary action up to and including termination of employment. Retaliatory conduct may also attract civil or criminal liability.

The Employer will connect the Discloser with internal and external support providers as necessary.

Support Available

Hunter Mason will connect whistleblowers with internal or external support services as needed. Concerns about detrimental treatment should be raised immediately with a Senior Manager or HSEQ Manager.

Availability & Review

This policy will be made available to all staff and reviewed periodically to ensure legal compliance and relevance.



Matthew Callender
Managing Director