

WHISTLEBLOWER POLICY

MURRAY ZIRCON MANUAL

Policy No.	CORP-ADM-POL-035
Effective Date.	30/06/2022
Version No.	0
Review Date	30/06/2022
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Introduction

At Murray Zircon, we are committed to the highest levels of ethics and integrity in the way we do business. We understand this is crucial to our continued success and reputation. Our shared Values and Code of Conduct, and policies guide our everyday conduct. We have a responsibility to speak up and report unethical behaviour.

Murray Zircon's Whistleblower Policy is an important tool in detecting corrupt, illegal or other undesirable conduct. Murray Zircon strongly encourages you to speak up if you suspect or witness any matters of concern. Murray Zircon will take all reports made under this Policy seriously.

This Policy describes the protections available to whistleblowers, what matters are reportable, how you can report your concerns without fear of detriment, and how Murray Zircon will support and protect you.

Background

Murray Zircon has developed this policy, having regard to the relevant legal requirements and current best practices relating to the protection of whistleblowers in the Corporations Act 2001 (Cth), Taxation Administration Act 1953 (Cth) and ASIC's Regulatory Guide 270 Whistleblower Policies.

Who is a Whistleblower?

A Whistleblower is someone who discloses Reportable Conduct under this Policy.

A Whistleblower can be a current or former partner, director, officer, company secretary, employee, supplier of goods or services to Murray Zircon (such as a secondee, contractor, and consultant) or a volunteer. It also applies to relatives, dependents or spouses of any of these people. (**Eligible Whistleblowers**)

Who is not covered?

This Policy does not apply to third parties (other than Eligible Whistleblowers) including without limitation customers of Murray Zircon.

Doing the right thing

We expect everyone who works for Murray Zircon to comply with our Code of Conduct, our policies and procedures, professional standards, laws and regulations.

You also have a responsibility to speak up using one of the many channels available within the company when you suspect something does not look or feel right.

We encourage you to consider talking to your trusted supervisor or manager, or if external to Murray Zircon, your Murray Zircon contact. We would rather hear your concerns directly so that we can resolve them directly.

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If you make a Whistleblower report pursuant to this Policy, we have a responsibility to protect you, including not disclosing your identity (unless required or permitted by law) and making sure you are not subject to detrimental conduct.

What is reportable conduct?

Reportable Conduct is anything that you have reasonable grounds to suspect, in relation to Murray Zircon, is:

- misconduct, or an improper state of affairs or circumstances
- conduct that constitutes a contravention of laws specified in the Whistleblower Laws or other Commonwealth laws that are punishable by imprisonment for a period of 12 months or more, or,
- conduct that represents a danger to the public or the financial system.

Examples of Reportable Conduct include but are not limited to:

- illegal conduct, such as theft, violence or threatened violence, and criminal damage against property
- fraud, money laundering or misappropriation of funds
- financial irregularities
- failure to comply with, or breach of, legal or regulatory requirements; and
- 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.

Reportable Conduct **excludes** personal work-related grievances as described below.

Personal work-related grievances

A personal work-related grievance is a report of behaviour that has implications for the disclosure personally and does not have significant implications for Murray Zircon (that do not relate to you). Examples include:

- an interpersonal conflict between you and another employee, or
- a decision relating to your employment or engagement, such as a transfer, promotion, or disciplinary action.

Personal work-related grievances do not qualify for protection under the Whistleblower Laws or this Policy. Personal work-related grievances must be raised in accordance with CORP-POL-026 Safe to Speak.

Accessibility of this Policy

This Policy is available to all current employees internally on Sharepoint and other Eligible Whistleblowers can access this Policy on the Murray Zircon external website.

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When can I make a Whistleblower Report?

Before making your Whistleblower Report you should satisfy yourself that you have reasonable grounds to suspect Reportable Conduct. "Reasonable grounds to suspect" is based on objective reasonableness of the reasons for the suspicion. In practice, a mere allegation with no supporting information is unlikely to reach that standard.

However, a Whistleblower does not need to prove their allegations. In addition, the disclosure can still qualify for protection even if the disclosure turns out to be incorrect.

How can I make a Whistleblower Report?

Murray Zircon recommends using an online submission to the Murray Zircon Speak Up site accessible on the company's website.

You can also make a report directly to any of the following (**Eligible Recipients**):

- General Manager
- Senior Murray Zircon Managers
- Business Advisor to the Board

There are other ways you can make disclosures in limited circumstances, including to a Regulator, or when making an emergency or public interest disclosure. Before you make any such disclosure you should seek independent legal advice to understand the criteria for making such a disclosure.

What should I include in the report?

Please provide as much detailed information as possible so that your report can be investigated.

Some useful details include:

- Date, time and location
- Names of person(s) involved, roles and their department or business
- Your relationship with the person(s) involved
- The general nature of your concern
- How you became aware of the issue
- Possible witnesses; and
- Other information that you have to support your report.

Should I make a Whistleblower Report anonymously?

You can choose to make your disclosure anonymously and if so, you will still be protected under the Whistleblower Laws. However, requiring complete anonymity may practically make it more difficult for us to investigate the issue or take the action we would like to take.

By letting us know who you are, we can contact you directly to discuss your concerns which will help us to investigate the complaint more quickly and efficiently. We can also appoint a contact to assist with any questions or concerns that you have about the process.

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Identity Protection

Where you make a disclosure, your identity (or any information which could identify you) will only be shared where:

- you provide consent; or
- Murray Zircon is permitted, or otherwise required by law.

However, you should be aware that in certain circumstances Murray Zircon does not need your consent to share your disclosure if:

- the information does not contain your identity
- we have taken all reasonable steps to reduce the risk that you will be identified from the information; and
- it is reasonably necessary for investigating the issues raised in the Whistleblower Report.

What protection will I have as a Whistleblower?

A Whistleblower must make a Whistleblower Report directly to an Eligible Recipient to qualify for protections under the Whistleblower Laws and this Policy. These protections include:

- identity protection
- protection from detriment
- compensation and remedies; and
- civil, criminal and administrative liability protection.

We are committed to taking all reasonable steps to protect you from detriment as a result of making a report under this Policy and the Whistleblower Laws.

The Whistleblower Protection Officer (WPO)

Where you have disclosed your identity to us, we may appoint a WPO.

The WPO will take steps to protect the interests of individuals making reports under this Policy.

The WPO would usually act as the contact point for communication with the Whistleblower. A WPO may be assigned to current identifiable manager and employees.

Detrimental Conduct is not tolerated

Murray Zircon does not tolerate any form of Detrimental Conduct taken by any person against the Whistleblower or any people who are involved in an investigation of a Whistleblower Report.

Examples of Detrimental Conduct can include, but are not limited to:

- dismissal of an employee or alteration of an employee or alteration of an employee's position/duties to their disadvantage or negative performance feedback that is not reflective of actual performance
- harassment, intimidation, or bullying; and
- threats to cause detriment.

Examples of actions that are not Detrimental Conduct may, for example, include:

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- managing a Whistleblower's unsatisfactory work performance, if the action is in line with Murray Zircon's performance management framework
- administrative action that is reasonable to protect the Whistleblower from Detriment.

Murray Zircon takes all allegations of Detrimental Conduct very seriously. If you believe you are suffering Detriment you should report it to us, and we will take appropriate steps in accordance with this and Murray Zircon's other policies.

False or misleading disclosures

When making a disclosure, you will be expected to have reasonable grounds to suspect the information you are disclosing is true, but you will not be subject to a penalty if the information turns out to be incorrect. However, you must not make a report that you know is not true or is misleading. This may be a breach of our Code of Conduct and will be considered a serious matter that may result in disciplinary action. There may also be legal consequences if you make a knowingly false report.

What is the investigation process?

Whilst the particular circumstances of each Whistleblower Report may require different investigation steps, all investigations will:

- follow a fair process
- be conducted as quickly and efficiently as the circumstances permit
- determine whether there is enough evidence to substantiate the matters reported, and
- be independent of the person(s) concerned with the allegations.

We will provide you with feedback, as appropriate on the progress and expected timeframes of the investigation.

Fair treatment of the individuals mentioned in the Whistleblower Report

The investigation process outlined in this Policy is also designed to allow fair treatment of any individuals mentioned in this disclosure, including;

- disclosures will be handled confidentially
- matters reported will be assessed and may be subject to an investigation
- there will be a presumption of innocence until the outcome of the investigation is determined
- the purpose of the investigation is to determine whether there is enough evidence to substantiate the matter reported.

What happens after an investigation?

Murray Zircon will notify you once an investigation has been completed but please be aware that Murray Zircon may be unable to disclose particular details or the outcome of the investigation.

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Raising concerns about actions taken by Murray Zircon

If a WPO has been appointed, you should immediately inform the WPO if you are concerned that:

- you may be, are being, or have been subjected to Detrimental Conduct
- there has been a disclosure of your identity, contrary to this Policy; or
- your disclosure has not been dealt with in line with this Policy.

The WPO will report your concerns to Murray Zircon for consideration.

Alternatively, you can raise your concerns in Murray Zircon Speak Up on the Murray Zircon website, or with a Regulator.



Craig Easton, General Manager

30 / 06 / 2022

Date

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(ceaston@murrayzircon.com.au) from
apaley@murrayzircon.com.au
IP: 60.240.125.242



VIEWED

30 / 06 / 2022

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Viewed by Craig Easton (ceaston@murrayzircon.com.au)
IP: 60.240.125.242



SIGNED

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Signed by Craig Easton (ceaston@murrayzircon.com.au)
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The document has been completed.