



## SCOPE

The requirements of this standard apply to all past and future directors, permanent employees, part-time employees, casual employees, suppliers, contractors, employees of contractors, tenderers or any other person or external party who has business dealings with Tutt Bryant Group Limited (TBG) and its related entities.

## OBJECTIVE

The objective of this Standard is to support our commitment to preserve an environment in which anyone to whom this Standard applies is empowered to raise concerns and report instances of any potential or actual Improper Conduct, without fear of retaliation.

## REQUIREMENTS

This standard requires:

1. Compliance with the Control Measures outlined in this Standard,
2. Compliance with the referenced TBG Governing Documents as the minimum standard, and
3. Where the referenced TBG Governing Documents cannot be followed due to contractual or other reasons, an alternate process that meets the requirements in the Control Measures that is approved in writing by the TBG Managing Director, or authorised delegate.

## DEFINITIONS

For this Standard, the following definitions apply:

<b>Group</b>	Means Tutt Bryant Group Limited 'Company' and its related entities.
<b>Improper Conduct</b>	Includes any act whether perceived to have happened or likely to occur in the future that is not consistent with laws and/or is in breach of TBG's Code of Conduct and/or related policies, procedures and standards.
<b>Whistleblowing</b>	Disclosure by (or for) a witness of actual or suspected Improper Conduct.
<b>Whistleblower (or 'Discloser')</b>	A person who reports Improper Conduct in accordance with this Standard.
<b>Disclosure Contact</b>	Means a person authorized by TBG to receive Whistleblower disclosures.
<b>Protected Disclosure</b>	Includes any communication based on reasonable grounds that discloses, or demonstrates an intention to disclose, information that may evidence an Improper Conduct.

## CONTROL MEASURES

### Protections available for Whistleblowers

Individuals should feel free to report any suspected Improper Conduct and know that if they do so, they will be protected against any retributive actions. Protection is available to a Whistleblower who discloses Improper Conduct:

1. That is made with reasonable grounds to believe it is true; and
2. Where the disclosure has been made in accordance with this Standard.

Nothing in this Standard is intended to abrogate or diminish any additional or alternative protections which may be available at law.

The Company strictly prohibits all forms of retaliation against a Whistleblower as a direct result of making a disclosure within the scope of this Standard and/or applicable legislation.

The Company will take all reasonable steps to support and protect Whistleblowers from such retaliation, which include but are not limited to, protection from:

2	22-AUG-2022	22-AUG-2025	Executive Manager - Corporate	Managing Director		Ref #	TBG-CS-STD-007
Version	Issue Date	Review Date	Document Owner	Approver			Page 1 of 4



- Termination of employment;
- Disciplinary action;
- Performance management;
- Harassment or intimidation;
- Harm or injury, including psychological harm;
- Damage to a person's property or reputation;
- Personal or financial disadvantage;
- Unlawful discrimination; or
- Any other conduct that constitutes retaliation;

provided of course that there is a basis for the concerns and that the person reporting, has acted in good faith and without malicious intent.

### Person responsible for managing protection(s)

The role and respective responsibilities of the Disclosure Contact is to protect the person/persons who have made a disclosure of Improper Conduct and to ensure that such persons are protected from victimization as a result of making such report(s).

### Who to contact – contacting the Disclosure Contact

Disclosure of Improper Conduct should be made to any (or all) of the following Disclosure Contacts:

- The appropriate Supervisor;
- The Executive Manager - Corporate (Paul Roberts)
- The Chief Financial Officer (Nick Restaino)

on 02 9646 6000 or [compliance@tuttbryant.com.au](mailto:compliance@tuttbryant.com.au).

Should any member of the executive team be involved, or is alleged to be involved in Improper Conduct, or is unavailable at the time of contact, direct contact is to be made with an equivalent executive within the Group. Refer to the Corporate Authority Matrix for guidance [TBG-FAA-STD-005 TBG Authority Matrix](#).

### Making a disclosure

Disclosures are to be made to the Disclosure Contact by email, phone or in person.

Where practicable the following information should be provided to enable timely action by the Disclosure Contact and the Company:

1. **Who:** The identity or name of the person/persons, party/parties or entity/entities involved in the alleged Improper Conduct.
2. **What:** The item, thing, place or person impacted by the alleged Improper Conduct.
3. **When:** The date or time of occurrence of the alleged Improper Conduct.
4. **Where:** The location or whereabouts the alleged Improper Conduct occurred.
5. **Provide:** Your name to the Disclosure Contact. Furthermore, nothing in this Policy prohibits or prevents you from making a disclosure anonymously.

*Note: It can be requested by you that anything which might identify you in your disclosure, be kept confidential or anonymous.*

### Support available for Whistleblowers

The Company will endeavour to provide support to the extent that it is reasonably possible, which may include but is not limited to:

2	22-AUG-2022	22-AUG-2025	Executive Manager - Corporate	Managing Director		Ref #	TBG-CS-STD-007
Version	Issue Date	Review Date	Document Owner	Approver			Page 2 of 4



- A Whistleblower who is our current or former employee of the Group can access our EAP access counselling service.
- The Company seeks to protect and support people from retaliation in response to their involvement in a Protected Disclosure investigation.
- The Company has discretion to grant a Whistleblower who has not engaged in serious or unlawful conduct, immunity from disciplinary action relating to matters that come to light as a result of their disclosure.
- Protections in accordance with the legislative requirements.

*Note: The Company retains the ability to raise with a Whistleblower matters that arise in the ordinary course of their employment or engagement, including routine performance or misconduct issues.*

### Investigation procedure

The investigation process will be undertaken in a confidential manner and will have regard to [TBG-RMQC-STD-007 Incident, Hazard Reporting and Investigations](#).

The investigation process will be determined by having regard to the magnitude and risk of the allegation, and may comprise:

1. In the first instance, the allegations will be forwarded to and reviewed by the Executive Manager, Corporate, who will advise the Managing Director and Chief Financial Officer of the allegations.
2. Following that review, the Executive Manager, Corporate will decide whether the allegations will be formally investigated.
3. The Executive Manager, Corporate will advise the Whistleblower of the decision and will confirm whether the Whistleblower is seeking protections pursuant to this Standard or under applicable laws.
4. If the Executive Manager, Corporate decides the allegations will be formally investigated, an investigation will immediately commence, which may involve nominating an external party to do so.
5. Timeframes of the investigation will be ascertained and may be communicated to the Whistleblower.
6. The Executive Manager, Corporate will provide a report setting out the findings in the allegations and material evidence. Findings may range from the allegation being fully substantiated to completely disproven.
7. The Executive Manager, Corporate will provide a copy of the report to the Managing Director and may not necessarily provide a copy of the report to the Whistleblower.
8. Findings that relate to criminal activity will be reported to the Police and/or regulators in a timely manner.
9. Following the report being received by the Managing Director, the Managing Director may then disclose the report to other relevant parties (such as the parent entity).

### Procedural fairness

The rules of natural justice and principles of procedural fairness are to be observed in the investigation arising out of an allegation and the person against whom the allegation is made may be given the right to respond.

### Retention of Documents

All documents and records degrading any reports of alleged violations, concerns or complaints should be forwarded to and/or retained by the Executive Manager, Corporate for record keeping purposes. It is illegal and against Company Policy to destroy any record that may be subject to or related to an investigation by the Company or any federal, state or regulatory body.

2	22-AUG-2022	22-AUG-2025	Executive Manager - Corporate	Managing Director		Ref #	TBG-CS-STD-007
<b>Version</b>	<b>Issue Date</b>	<b>Review Date</b>	<b>Document Owner</b>	<b>Approver</b>			<b>Page 3 of 4</b>



## Communication of this Whistleblower Protections Standard

This Standard and other TBG Governing Documents are made available to officers and employees of the Group through the TBG Intranet and the TBG Induction.

## False or Vexatious Allegations

Where it is found that a person purporting to be a Whistleblower has made malicious, false or vexatious allegations of Improper Conduct, then that conduct itself may be considered as a serious matter and render the person concerned to be subject to disciplinary action applied in accordance with the Company's procedures ([TBG-CS-PRO-004 Discipline](#), which can lead to application of the [TBG-CS-PRO-005 Termination](#)).

## No repercussions following disclosures which cannot be substantiated in a subsequent investigation

No action will be taken against an employee of the Group who makes a Protected Disclosure or where it can be demonstrated that there were reasonable grounds to make a disclosure, which cannot be substantiated in a subsequent investigation.

## COMPLIANCE

Performance review and reporting, in addition to Management review and auditing determine compliance to this Standard in accordance with [TBG-BPO-STD-005 Management Review and Auditing](#).

Any breach of applicable laws or of this Standard (or related TBG Policies, Standards and other governing documents) will result in disciplinary action applied in accordance with the Company's procedures ([TBG-CS-PRO-004 Discipline](#), which can lead to application of the [TBG-CS-PRO-005 Termination](#) and also prosecution). Additionally, the Company may seek remedies permitted by law from persons convicted of a criminal offence or dismissed for serious misconduct.

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2	22-AUG-2022	22-AUG-2025	Executive Manager - Corporate	Managing Director		Ref #	TBG-CS-STD-007
Version	Issue Date	Review Date	Document Owner	Approver			Page 4 of 4