

	<h1>POLICY</h1>	MPD: 26		
		VERSION 1.0	APPROVED SEP 2020	REVIEW DUE SEP 2022
<b>WHISTLEBLOWING</b>				
<b>AUTHORISED BY: BOARD OF DIRECTORS</b>				

The Muir Group Pty Ltd (TMG), together with all entities within the group, is committed to:

- complying with its legal obligations and also to acting ethically and responsibly; and
- conducting business in a way that is open and accountable to shareholders and clients

## Scope

This policy applies to:

- all staff of TMG; directors, senior management and employees alike
- employees or principals of organisations which have a commercial relationship with TMG as customers, suppliers, consultants, advisers, agents or otherwise

## Purpose

The policy aims to encourage reporting of wrongdoing that is of legitimate concern in respect of impropriety, serious unethical behaviour, illegal or fraudulent conduct. The policy also aims to provide protection for those who disclose serious concerns.

## Primary Obligations of the Code

The company has an expectation for all persons to feel confident when reporting any wrongdoing that their identity will remain confidential and they will be protected from reprisal, discrimination, harassment or victimisation for making the disclosure.

An independent internal inquiry or investigation will be conducted and issues subsequently identified from the inquiry will be resolved and/or rectified. The person reporting the wrongdoing will be advised of the outcome.

Reportable matters include but are not limited to:

- dishonest or fraudulent behaviour;
- perverting the cause of justice
- illegal activities (including theft, dealing in or use of illicit drugs, violence or threatened violence and criminal damage against property);
- behaviour that is oppressive, discriminatory or grossly negligent
- dealing in modern slavery practices as determined under the Modern Slavery Act (2018)
- a serious risk to public health, public safety or the environment; or
- any other conduct which may cause loss or be otherwise detrimental to the interests of TMG.

It is noted personal work related grievances are not covered under this Policy and should be reported to your line manager or human resources representative in accordance with MPD05 – Equity, Workplace Harassment & Bullying

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## Raising a Concern

In most cases a person should raise any concern with either the company's Managing Director or General Manager. They in turn may refer the matter to the company's legal team.

A meeting will be arranged with the whistleblower as soon as possible to discuss and document their concern. The whistleblower may bring a colleague to any meeting held under the auspices of this policy. The colleague must respect and abide by the confidentiality of the disclosure and any subsequent investigation.

TMG will document a written summary of the concern and provide the whistleblower with a copy of the meeting. TMG will also aim to provide an indication of the proposed process to deal with the matter.

Should a whistleblower wish to remain anonymous, a concern may be raised and submitted in writing to either the Managing Director or the General Manager and that concern will not be treated any differently to the above.

The aim of this policy is to provide an internal mechanism for reporting whistleblowing concerns and in the majority of cases, a whistleblower should not find it necessary to alert external parties. Anyone who feels their concern should be externally reported are encouraged to seek advice internally before reporting a concern to an external party.

## Confidential Information

Notwithstanding the above a whistleblower's identity may be disclosed if one of the following exceptions applies:

- the whistleblower consents to the disclosure of their identity;
- the concern is reported to the Australian Securities & Investment Commission (ASIC), the Australian Prudential Regulation Authority (APRA), the Tax Commissioner of the Australian Federal Police; or
- the concern is raised with a lawyer for the purpose of obtaining legal advice

## Investigation & Outcome

Once a concern has been raised, TMG will carry out an initial assessment to determine the scope of any investigation and will inform the whistleblower of the outcome of the process and keep them informed of the progress and the likely timeline.

If TMG concludes that if a whistleblower has made false allegations maliciously, dishonestly or with a view to personal gain, the whistleblower will be subject to disciplinary action.