

# Whistleblower Policy

## 1.0 Scope

This Policy sets out GPT's commitment to a culture of corporate compliance and ethical behaviour by the reporting of wrongdoing through the appropriate channels outlined in this Policy.

## 2.0 Objective

GPT's objective is to:

- (a) encourage the reporting of:
  - matters that may cause financial or non-financial loss to GPT or damage GPT's reputation;
  - unsafe work practices;
  - dishonest or unethical conduct; or
  - any other conduct that is contrary to GPT's Code of Conduct ("Improper Conduct");
- (b) enable management to effectively deal with reports from whistleblowers in a way that will protect the identity of the whistleblower and provide for the secure storage of provided information;
- (c) establish policies for the protection of whistleblowers against reprisal by any person, either internal or external to GPT; and
- (d) provide for an appropriate infrastructure which includes the appointment of dedicated 'Whistleblower Officer/s' as an alternative means of reporting.

## 3.0 Appointment of Whistleblower Officers

The role of the Whistleblower Officer is to safeguard the interests of the whistleblower in terms of this Policy, other GPT policies (eg Code of Conduct) and other applicable legislation.

The qualities of the designated Whistleblower Officer include:

- (a) trustworthiness;
- (b) ability to relate to people and to reassure them;
- (c) diplomacy and tact;
- (d) ability to be objective;
- (e) sound judgement;
- (f) investigative skills;
- (g) integrity;
- (h) communication skills;

The Whistleblower Officer must have unfettered access to independent financial, legal and operational advisers as required.

## 4.0 Confidentiality

A whistleblower who reports or seeks to report Improper Conduct, is given a guarantee of anonymity (if desired by the whistleblower), bearing in mind that in certain circumstances, the disclosure of the identity of the whistleblower may be required in legal proceedings.

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Information received from a whistleblower is held in the strictest confidence and must only be disclosed to a person not connected with the investigation of the matters raised if:

- (a) the whistleblower has been consulted and consents in writing to the disclosure; or
- (b) GPT or the Whistleblower Officer are compelled by law to do so.

## 5.0 Communication with the whistleblower

If a person making a report of Improper Conduct is an employee, GPT will ensure that the whistleblower is kept informed of the outcomes of the investigation, subject only to the considerations of privacy of those against whom the allegations were made and customary practices of confidentiality within GPT.

If the person making the report is not an employee, then this communication policy will apply once the person has agreed in writing to maintain confidentiality in relation to any information provided to them or made by them.

## 6.0 Investigation

All reports of Improper Conduct are subject of a thorough investigation with the objective of locating evidence that either substantiates or refutes the claims made by the whistleblower.

Such investigations are conducted by the Whistleblower Officer and are required to follow best practice investigation and to be fair and independent of the business unit concerned, the whistleblower or any other person being the subject of the report.

*The rules of natural justice are to be observed in any investigation arising out of a report ie conducted without bias and the person against whom the allegation is made should be given the right to respond.*

In the interest of both the perception and reality of objectivity, consideration is given to employing outside investigators at arms length from GPT, particularly where the allegation is serious.

## 7.0 Immunity from disciplinary action

GPT promotes a culture that encourages the reporting of Improper Conduct, granting administrative immunity for whistleblowers. This provides that a whistleblower who has acted in good faith and who has not themselves engaged in serious misconduct or illegal conduct, will not be personally disadvantaged by having made the report either by:

- (a) dismissal;
- (b) demotion;
- (c) any form of harassment;
- (d) discrimination; or
- (e) current or future bias.

*Note: GPT has no power to offer any person immunity against prosecution in the criminal jurisdiction.*

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## 8.0 Reporting

Internal reporting arrangements ensure that:

- (a) all verifiable Improper Conduct is dealt with appropriately; and
- (b) systemic and recurring problems are reported to those with sufficient authority to correct them.

The Whistleblower Officer has a direct line of reporting to the Chief Executive Officer (**CEO**), senior executives and Audit and Risk Management Committee.

In the case where the CEO has been accused of reportable conduct, or where the CEO has a close relationship with the person against whom the accusation is made, the Whistleblower Officer must have direct access to the Audit and Risk Management Committee.

## 9.0 False reporting

Where it has been shown that a person has knowingly or recklessly made a false report of Improper Conduct, that conduct itself should be considered a serious matter and render the person concerned subject to disciplinary proceedings as provided by the Code of Conduct.

## 10.0 Unauthorised release of information received from a whistleblower

Information coming into the possession of a person from a whistleblower must not be released without authority to any person who is not involved in the investigation or resolution of the matter, unless as provided by this Policy.

Similarly, the identity or any information that may lead to the identification of a whistleblower must not be released to any person who is not involved in the investigation or resolution of the matter.

Breach of this Policy is regarded by GPT as a serious matter which may result in disciplinary action which may include termination.

## 11.0 Code of Conduct

GPT has a well documented and communicated Code of Conduct that clearly sets out conduct that GPT deems unacceptable. Failure to comply with the Code of Conduct would be seen as Improper Conduct within the meaning of this Policy.

## 12.0 Education and training

The importance of reporting Improper Conduct and GPT's reason for such reporting is part of GPT's training program. This is conducted both as part of GPT's induction and ongoing training as well as emphasising the undesirability of malicious or vexatious reporting.

## 13.0 Annual Review

The Whistleblower Policy will be reviewed on an annual basis to ensure that it remains current and effective.