

# Whistleblower Policy

## 1. Purpose

This policy aims to give HOME in PLACE officers and workers the confidence to be a ‘whistleblower’ and raise concerns internally about suspicious activity, misconduct, or wrongdoing, by providing an objective, confidential, independent reporting and investigation mechanism that protects officers and workers from recrimination, reprisal or disadvantage.

In addition, this policy aims to achieve the following benefits for HOME in PLACE:

- More effective compliance with laws;
- More efficient fiscal management;
- A healthier and safer work environment;
- More effective management;
- Improved morale; and
- A living record of the fact that HOME in PLACE takes its governance obligations seriously.

## 2. Scope

This policy applies to the HOME in PLACE workers and its directors, current and former directors and workers, contractors, suppliers and their employees, volunteers, partners, and their staff. Associates and specified family members and other external parties, such as program beneficiaries, tenants, and members of the public.

A contractor or supplier includes an individual who supplies goods or services whether paid or unpaid. It is expected that Partners will have policies, procedures or similar in place covering Whistleblowing wrongdoing. In the absence of such policies and procedures they will be expected to adopt HOME in PLACE policies and procedures.

## Introduction

The Board of HOME in PLACE and its related bodies corporate is committed to ensuring its directors and workers, act at all times in compliance with all laws, and in compliance with HOME in PLACE’s ethical standards, as set out in its Code of Conduct and Privacy & Confidentiality Statement for directors, members and workers.

The Board recognises that any genuine commitment to detecting and preventing illegal and other undesirable conduct must include, as a fundamental cornerstone, a mechanism whereby directors, workers

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and others can report their concerns freely and without fear of recrimination, reprisal, or disadvantage. This Policy provides such a mechanism and encourages the reporting of such conduct.

### 3. Policy Statement

The Board will not tolerate corrupt, illegal, unethical or other serious improper conduct by any person employed by who holds an office in or is otherwise connected with HOME in PLACE. This includes conduct that represents a danger to the public or financial system, suspected contraventions of certain federal laws, and misconduct or an improper state of affairs or circumstances in relation to a regulated entity excluding personal work-related grievances unless the grievance relates to systemic issues or involves detrimental conduct to the whistleblower or where a work-related grievance is disclosed to a legal practitioner to obtain legal advice or representation in relation to whistleblower provisions.

All HOME in PLACE directors and workers have a responsibility to help detect, prevent, and report instances of such conduct and HOME in PLACE directors and senior managers will take all reasonable measures to encourage the disclosure of such conduct and will provide appropriate mechanisms for whistleblowers to report freely and without fear of recrimination, reprisal or disadvantage.

Whistleblower's can report concerns to the Whistleblower Officer or senior managers of HOME in PLACE (Eligible recipients) external agencies such as Australian Securities and Investments Commission (ASIC), Australian Prudential Regulation Authority (APRA) and other prescribed Commonwealth authorities, law enforcement bodies, auditors, actuaries, and lawyers representing HOME in PLACE and persons authorised to receive disclosures including a whistleblowing hotline.

### Who is a Whistleblower?

A whistleblower, for the purposes of this policy, is any individual who makes a report under its provisions. In alignment with the Whistleblower Laws, eligible whistleblowers include current and former directors, partners, clients, workers, contractors, and suppliers (including employees of suppliers), as well as associates of HOME in PLACE. Additionally, relatives, spouses, and dependents of these individuals are also considered whistleblowers under this policy.

HOME in PLACE may also extend whistleblower protections to individuals who report matters that do not fall within the scope of the Whistleblower Laws. In such cases, while statutory protections may not apply, equivalent protections will be provided under this policy to ensure confidentiality, protection from retaliation, and appropriate support.

### To whom disclosures that qualify for protection under the law may be made.

Whistleblowers are encouraged to report any genuine concern of corrupt, illegal, unethical, or serious misconduct or an 'improper state of affairs' as soon as practical after becoming aware of the conduct. Any concerns raised under this Policy should be disclosed to an Eligible recipient in the following order:

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- To the Whistleblower Officer;
- To the CEO;
- To a senior manager being an Executive Manager or Group Executive Manager; To the Group Managing Director;
- To the Fraud Control Officer (GCFO);
- To the Chair of the Finance, Risk and Audit Committee;
- To the Chair of HOME in PLACE Board of Directors.

Any person in this chain may be skipped if they are the subject of the concern or if there is a reason to believe that the person will not deal with the concern properly.

## How disclosures that qualify for protection under the law may be made

Disclosures by whistleblowers may be made to an Eligible recipient in writing, by email, verbally or through lodging a Whistleblower incident form via Folio, the online software platform used by HOME in PLACE for incident and risk management.

## What types of matters should be reported under this policy?

Any conduct or the deliberate concealment of such conduct by any person employed by, holding an office in, or is otherwise connected with, HOME in PLACE, that the whistleblower has objectively reasonable grounds to suspect wrongdoing, should be reported under this policy. This includes, but is not limited to:

- Corrupt behaviour;
- Dishonest Conduct;
- Fraudulent activities;
- Illegal actions (including theft, drug sale or use, violence or threatened violence and criminal damage against property);
- Unlawful Conduct or breaches of any legal or regulatory obligation;
- Conduct that represents a danger to the public or financial system, suspected contraventions of certain federal laws;
- Misconduct or an improper state of affairs or circumstances in relation to a regulated entity excluding personal work-related grievances;
- Unethical or an unfair behaviour such as abuse of position or when a conflict of interest arises;
- Serious improper conduct;
- An unsafe work practice; and
- Any other conduct which may cause loss to HOME in PLACE, or otherwise which may be detrimental to its interests.

## Reporting & Investigation

The whistleblower should be asked to lodge an incident report about the conduct using the relevant Online incident reporting form, "Whistleblower Incident". Where the report comes from an external party the

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person receiving the report to HOME in PLACE is responsible for lodging an incident report in our online Incident, Risk and Compliance Platform.

All matters reported under this Policy will be investigated by a person designated as the HOME in PLACE Whistleblower Investigation Officer and may include the engagement of external professionals to undertake the investigation on behalf of HOME in PLACE. The principles of natural justice will be observed in that the investigation will be conducted without bias and any person against whom an allegation is made will be given the opportunity to respond.

Further information on how to lodge an incident report is outlined in HOME in PLACE's Whistleblowers Incident Report Navigation Guide.. Information about how HOME in PLACE will manage an investigation under this Policy and the investigation procedures are outlined in the HOME in PLACE PROC-033 Investigation Procedure. Personal staff grievances will be managed in accordance with HOME in PLACE POL-028-02 Workplace Grievance Policy.

Disclosures by whistleblowers under this Policy will be marked confidential in Folio and access will be limited to the HOME in PLACE Group Managing Director, The Home in Place Board Chair, Fraud Control Officer and/or Whistleblower Investigation Officer. Personal information will be managed in accordance with HOME in PLACE POL-019 Privacy Policy.

## Whistleblower Anonymity

HOME in PLACE limits the number of individuals who have access to details of a concern raised and any information obtained through the investigation process. Concerns are thoroughly investigated to identify verifiable facts and ensure fairness. Those conducting investigations must comply with the organisation's Values, and no individual alleged to have been involved in inappropriate conduct or wrongdoing will be involved in decision-making regarding the investigation or any required actions.

Anonymous disclosures are permitted and will be investigated as fully as reasonably possible based on the information provided. The organisation is committed to maintaining the confidentiality of whistleblowers; however, confidentiality cannot be guaranteed in all circumstances. Any commitment to anonymity is subject to legal requirements that may necessitate disclosure in legal proceedings. Information obtained from a whistleblower will only be disclosed to the extent necessary to investigate the matter, if the whistleblower consents to disclosure, or as required by law.

All individuals contributing to an investigation are required to maintain confidentiality to protect and respect all parties involved. If a report concerns the conduct of a particular person, the matters raised may be discussed with them to obtain their perspective. They will be directed to maintain confidentiality, adhere to the organisation's Code of Conduct, policies, and Values, and refrain from any retaliatory actions.

Any individual who improperly discloses a whistleblower's identity, victimises, or engages in (or threatens) detrimental conduct toward a whistleblower or potential whistleblower may be subject to civil penalties and may be charged with a criminal offence and potential imprisonment for failing to comply with the confidentiality and detrimental conduct provisions of this Policy.

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Additionally, unauthorised disclosure of confidential information by an employee, outside of this policy's provisions, may result in disciplinary action, including summary dismissal.

## Whistleblower Protection

Where it is not possible to maintain the anonymity of the whistleblower, the whistleblower may request of the Whistleblower Investigation Officer that an alternative means of protection such as a relocation or leave of absence be provided. Any such requests will be considered in good faith by HOME in PLACE and may be actioned with the assistance of a Whistleblower Protection Officer who is responsible for assisting to protect the whistleblower from recrimination, reprisal, or disadvantage as a result of reporting under this policy.

Where it is established by the Whistleblower Investigations Officer that the whistleblower is not acting in good faith, or they have made a false report of misconduct, then they will be subjected to disciplinary proceedings, including summary dismissal.

Whilst not intending to at all discourage whistleblowers from reporting matters of genuine concern, it is strongly suggested whistleblowers ensure as far as possible that reports are factually accurate, complete, from firsthand knowledge, presented in an unbiased fashion (and any possible perception of bias of the whistleblower is disclosed), and without material omission.

### **How HOME in PLACE will ensure fair treatment of employees who are mentioned in disclosures that qualify for protection under the law, or to whom such disclosures relate**

HOME in PLACE is committed to ensuring employees are treated fairly and apply the principles of procedural fairness and natural justice when investigating allegations of wrongdoing. The Whistleblower Investigation Officer will consider the available evidence and the existence of reasonable or substantive evidence and may carry out internal investigations and data analysis to verify or identify if information is available to substantiate disclosures that implicate HOME in PLACE employees. If there is reasonable evidence supporting a disclosure of wrongdoing by an employee, they will be provided with information about the allegations and provided an opportunity to respond. Employees will be offered the right to have a support person present for any interviews and will be provided access to Employee Assistance Programs. The identify of the whistleblower will be kept confidential unless HOME in PLACE is required by law to disclose this information. Refer to HOME in PLACE's PROC-033 Investigation Procedure for details of the investigation process.

## 4. Definitions and Acronyms Glossary

For clarification of any definitions or acronyms contained within this document, please click on the [Glossary](#) for information.

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