

WHISTLEBLOWER POLICY

Purpose

Australian Institute of Business (AIB) is committed to the highest standards of conduct and ethical behaviour in all of our business activities, and to promoting and supporting a culture of honest and ethical behaviour, corporate compliance and strong corporate governance.

Creating a supportive environment where people feel safe to speak up underpins AIB culture. When people do not speak up, this undermines the culture and exposes AIB to risks. This policy is to ensure there are various measures in place to ensure no one is discouraged from speaking up or disadvantaged or victimised for doing so.

This policy will be made available on the AIB website.

This policy supplements any other policies applicable to AIB.

Scope

This policy applies to the confidential reporting of suspected Wrongdoing by all AIB Staff, students or other stakeholders of AIB.

Definitions

Unless otherwise defined in this document, all capitalised terms are defined in the glossary.

Policy

- 1. AIB believes that:
 - 1.1. Wrongdoing presents risks and that action is required to both rectify and prevent recurrence.
 - 1.2. Wrongdoing should be identified and reported in good faith by persons who work within or with the organisation.
 - 1.3. Processes for reporting Wrongdoing need to be accessible, timely, and able to protect the discloser.
 - 1.4. The desire of any Whistleblower to report Wrongdoing anonymously is reasonable and should be respected.
 - 1.5. Disclosures by Whistleblowers should be protected, even if they are found to be incorrect.

- 1.6. Whistleblowers should be kept informed of the progress of investigations and final outcomes.
- 1.7. Training may be required to ensure staff are aware of responsibilities and obligations relating to whistleblowing, and
- 1.8. Additional protections are required to protect those who act as Whistleblowers for Wrongdoing by senior executives or officers.

2. AIB will:

- 2.1 Provide confidential and supportive mechanisms for the reporting of alleged Wrongdoing:
 - (a) so that Whistleblowers feel they can come forward to make a disclosure about Wrongdoing, with confidence that AIB will take appropriate action, and
 - (b) to ensure that there are no adverse consequences when making a Whistleblower complaint.
- 2.2 Keep confidential, where appropriate, the identity of a Whistleblower and other confidential information disclosed in the course of the Whistleblower's disclosure.
- 2.3 Afford Whistleblowers any additional specific protections afforded them under any specific legislation (including, but not limited to protections afforded by the *Corporations Act*, the *Taxation Administration Act* and the *Competition & Consumer Act*).
- 2.4 Conduct investigations of disclosures in a fair and objective manner.
- 2.5 Liaise with external parties during investigations as appropriate/as legally obliged.
- 2.6 Ensure appropriate remediation steps are undertaken in the event an allegation is substantiated.
- 2.7 Notify, as appropriate, relevant authorities of Wrongdoing (and, specifically, if there are mandatory reporting requirements in place for conduct, the subject of the Wrongdoing, to undertake that mandatory reporting).
- 2.8 Comply with its legal obligations relating to any relevant legislation.
- 2.9 Review the Whistleblower Policy and Procedure regularly to ensure ongoing effectiveness and compliance with relevant legislation.

Related Policies and Procedures:

Whistleblower Procedure Privacy Policy Staff Code of Conduct

Related Legislation:

Corporations Act 2001 (Corporations Act) Fair Work Act 2009 Privacy Act 1988 Taxation Administration Act 1953 (Taxation Administration Act)
Competition & Consumer Act, 2010 (Cth)
Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019

Responsibility:

Chief Executive Officer

Current Status: Version 2

Approved By: Board of Directors

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Previous Versions: 8 March 2017

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