

# Integrity and Whistleblower Policy

Human Resources  
Monadelphous Group Limited

## i. Company Definition

This document applies to all sites, employees and activities of Monadelphous Group Limited (herein referred to as The Company).

## ii. Integrity and Whistleblower Policy

### Our Commitment

We are committed to ensuring that the decisions and actions taken by our employees and contractors reflect the highest standards of integrity as outlined in our *Code of Conduct (BMS-POL-025)*.

To create and preserve this environment, we provide a reporting framework, which is regularly reviewed, in which employees, contractors, and members of the public are able to report instances of actual or suspected unethical or unlawful conduct, without fear of detrimental conduct. Our reporting framework is an important tool in assisting us to identify any wrongdoing. We encourage our employees and contractors and any members who are aware of any wrongdoing to speak up and report it to us.

We are committed to acting on all matters raised, with integrity and fairness.

### Who does the policy apply to?

This policy applies to:

- (a) officers and employees of the Company (both current and former);
- (b) suppliers of services and goods to the Company (whether paid or unpaid) and their employees;
- (c) associates of the Company; and
- (d) relatives, dependants or spouses of any current and former of any person in (a) to (c) above.

### What matters does the policy apply to?

This policy applies to any disclosure of alleged misconduct (such as fraud, negligence, default, breach of trust or breach of duty) or an improper state of affairs in respect of the Company or other conduct to which the whistleblower protection regime under the *Corporations Act 2001* or the *Tax Administration Act 1953* applies ('Disclosable Matters').

This policy also applies to other matters which, whilst not a Disclosable Matter, are a breach of our *Code of Conduct (BMS-POL-025)*, our *Supplier Code of Conduct (BMS-POL-1004)* or the laws that govern the countries in which we operate. However, matters which are not Disclosable Matters do not qualify for protection under the *Corporations Act 2001* or the *Tax Administration Act 1943*.

Matters pertaining to a work-related grievance or unacceptable workplace behaviour (including sexual harassment and assault) should, in the first instance be raised under *Grievance Resolution Procedure (BMS-PRO-063)*, *Equal Opportunity and Anti-Harassment Procedure (BMS-PRO-552)* or the employee's Contract of Employment or applicable Industrial Instrument as is appropriate in the circumstances.

### How can a report be made?

Reports that relate to Disclosable Matters may be made to any of the following Eligible Recipients:

- (a) directors or company secretary of the Company;
- (b) Managing Director, Executive General Managers, CFO, General Manager – Human Resources or Group Legal Counsel;
- (c) Internal or external auditors of the Company (including a member of an audit team conducting an audit) or any actuary of the Company.

It is expected that most concerns or queries regarding a Disclosable Matter will be able to be raised with one of the Eligible Recipients above. This allows us to identify and address any wrongdoing as early as possible. However, if you do not feel that is appropriate or you are concerned that the matter has not been appropriately addressed then you may report the issue using the Monadelphous Integrity Hotline (details below).

It is expected that most concerns or queries regarding a Disclosable Matter will be able to be raised with one of the Eligible Recipients above. This allows us to identify and address any wrongdoing as early as possible. However, if you do not feel that is appropriate or you are concerned that the matter has not been appropriately addressed then you may report the issue using the Monadelphous Integrity Hotline (details below).

You may also make a report in relation to a Disclosable Matter to Australian Securities and Investment Commission (ASIC), Australian Prudential Regulation Authority (APRA), the Australian Taxation Office (ATO) or other Commonwealth body prescribed by the whistleblower protection legislation. Reports made to legal practitioners for the purposes of obtaining legal advice or legal representation may also be protected.

In certain circumstances, public interest or emergency disclosures in respect of Disclosable Matters that are made by you to journalists or parliamentarians may be protected by the whistleblower protection legislation. It is important that you understand the criteria for making such a public interest or emergency disclosure as there are requirements that a report is first made to us or a relevant Commonwealth body. You should obtain independent legal advice before making a public interest or emergency disclosure.

Reports in relation to matters that are not Disclosable Matters should be made directly with a company representative as set out in the *Code of Conduct (BMS-POL-025)* or *Supplier Code of Conduct (BMS-POL-1004)*. We encourage you to raise any issues directly with us but if you do not feel that this is appropriate or you are concerned about the investigation, you may also report the issue using the Monadelphous Integrity Hotline (details below).

In respect of any report, you may choose to remain anonymous and may refuse to answer any questions that you consider may reveal your identity. If you choose to remain anonymous then we will take steps to protect your confidentiality (such as secure record keeping and information sharing). However, if you choose to remain anonymous there may be limitations on our ability to investigate the matter.

## **Legal protection for disclosers**

In respect of Disclosable Matters, the following protections are available under the whistleblower protection legislation.

### **Confidentiality**

We will not disclose your identity or any information that is likely to lead to your identification without your consent or in accordance with an exception under the whistleblower protection legislation. If you are concerned about a breach of your confidentiality then you may lodge a complaint with us in the same manner as you would make a report under this policy or with a regulatory body such as ASIC, APRA or the ATO.

### **Detrimental conduct**

We will not engage in conduct that causes detriment to you in respect of the report of a Disclosable Matter. Examples of detrimental conduct are; dismissal of an employee, injury or harm, disadvantageous alteration of duties, discrimination, harassment, intimidation and damage to your property, reputation, business or financial position. If you consider that you have been subjected to detrimental conduct you can raise it with us in the same way as you would make a report under this policy.

### **Compensation**

You may be entitled to seek compensation or other remedies through the courts if you suffer loss, damage or injury due to the disclosure of a Disclosable Matter and we did not take reasonable precautions or due diligence to prevent the detrimental conduct. You should seek your own independent legal advice in respect of any claim for compensation.

### **Civil, criminal and administrative liability protection**

You may be entitled to be protected from civil, criminal and administrative liability in respect of any disclosure. These protections may not grant immunity for your own misconduct. You should seek your own independent legal advice.

## **Investigation of reportable conduct**

We will investigate any matter reported to us under this policy as soon as practicable after the report. We will conduct our investigation fairly and objectively. The investigation process that we adopt may depend on the nature of the conduct that has been reported. Subject to any privacy considerations, if the report is not anonymous, we will provide feedback to you in relation to the progress of the investigation at reasonable times.

## Monadelphous Integrity Hotline

The Monadelphous Integrity Hotline is an external independent service provided by Deloitte. Reports to the hotline can be made by:

**Phone:** Tollfree (within Australia) – 1800 952 477  
Direct dial (for international dialling) - +61 3 9667 3570

**Post:** Monadelphous Integrity Hotline  
Reply paid 12628 A'Beckett Street  
Victoria 8006

**Email:** [MonadelphousIntegrity@deloitte.com.au](mailto:MonadelphousIntegrity@deloitte.com.au)

**Website:** [www.MonadelphousIntegrity.deloitte.com.au](http://www.MonadelphousIntegrity.deloitte.com.au)

**Fax:** +61 3 9691 8182

Issues raised with mischievous or malicious intent are considered to be a breach of the *Company Code of Conduct (BMS-POL-025)*.

All information provided will be treated seriously and dealt with in a sensitive and confidential manner. The Deloitte team are experienced in dealing with unethical and unlawful matters and can be contacted 24 hours a day, seven days a week. Deloitte will prepare a report detailing the information they have received, which will be forwarded to a member of the Monadelphous Integrity Committee for review and action.