WHISTLEBLOWER POLICY

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Author	Alfie Go, Operations Manager	Approved by Board	Feb 2025
Owner	CEO	Scheduled review	Feb 2027
Responsibility for implementation	CEO		

Purpose

This policy aims to encourage reporting of misconduct that is of legitimate concern and to provide a safe reporting mechanism and investigation process for people who make disclosures.

The policy sets out who is entitled to protection as a whistleblower under this policy and how disclosure made by whistleblowers in accordance with this policy will be handled by Homeward Bound Projects Ltd.

Scope

This policy applies to all Homeward Bound employees (current and former), the Board of Directors, contractors or volunteers engaged by Homeward Bound, and provides protection to whistleblowers.

Whistleblowers are entitled to protection under the *Corporations Act 2001* (Cth) (Corporations Act) and, if applicable, under the *Taxation Administration Act 1953* (Cth) Taxation Administration Act.

Definitions

Whistleblowing	Disclosure by (or for) a witness of actual or suspected wrongdoing
Whistleblower	A person who reports wrongdoing or misconduct in accordance with this policy
Misconduct/Wrongdoing	Reportable concerns that include but are not limited to: • Illegal or unlawful conduct by a director or employee of Homeward Bound, such as fraud, corruption, bribery, theft,

	violence, harassment or intimidation, criminal damage to property or other breaches of applicable laws; • Misconduct or improper state of affairs or circumstances in relation to Homeward Bound, including: ➢ governance ➢ accounting or audit matters ➢ the organisation's tax affairs or the tax affairs of an associate of Homeward Bound ➢ conduct that represents a danger to the public (including health, safety or the environment) ➢ conduct that amounts to an abuse of authority ➢ conduct that may cause financial loss to Homeward Bound or damage to its reputation or otherwise detrimental to its interests. • Undertaking actions based on improper motives, acts unreasonably, is oppressive or negligent; • Gross mismanagement that causes serious or substantial waste (including financially); • Undeclared conflicts of interest; • Breaches of Homeward Bound policies and procedures, including its Code of Conduct.

Policy

Homeward Bound is committed to upholding the highest standards of legal, ethical and moral behaviour through promoting and supporting a culture of honest and ethical behaviour, corporate compliance and good corporate governance and to the protection of individuals who disclose information about illegal or improper conduct occurring within the organisation.

Homeward Bound encourages the reporting of any instances of suspected unethical, illegal, fraudulent or undesirable conduct involving Homeward Bound. Through making a report, Homeward Bound will provide protections and measures so that any person making a report may do so confidentially and without fear of intimidation, disadvantage and reprisal.

When a person makes a disclosure:

- Their identity will be kept confidential unless they consent to their identity becoming known.
- They will be protected from reprisal, discrimination, harassment, or victimisation for making the disclosure.
- An independent investigation will be conducted.
- Issues identified from the investigation will be resolved and/or rectified.
- They will be informed of the outcome.
- Any retaliation for having made the disclosure will be treated as serious wrongdoing under this policy.

Personal work-related grievances

Personal work-related grievances that don't involve a detriment caused to you as a protected whistleblower (or a threat of detriment) aren't a reportable matter and aren't protected under the Corporations Act or Taxation Administration Act.

A personal work-related grievance is one that relates to your current or former employment that has implications for you personally but doesn't have significant implications for Homeward Bound.

An example of a work-related grievance that is not protected by law could include if you believe you have missed out on a promotion that you deserve or if you don't like the managerial style of your supervisor.

However, a work-related grievance may still qualify for protection under the law if (for example):

- it is a mixed report that includes information about a Reportable Matter (as well as a work-related grievance);
- Homeward Bound has broken employment or other laws which are punishable by imprisonment for 12 months or more or acted in a way that is a threat to public safety;
- the disclosure relates to information that suggests misconduct that goes further than the whistleblower's personal circumstances; or
- the whistleblower suffers from or is threatened with detriment for making a disclosure.

How to Report

Where an employee of Homeward Bound believes in good faith on reasonable grounds that any other employee, volunteer, or contractor has breached general law, organisational policy, or generally recognised principles of ethics, and wishes to report their concern, that employee must report their concern to:

- the CEO: or, if they feel that the CEO may be complicit in the breach
- the Chair of the Homeward Bound Board, or
- the organisation's nominated Whistleblower Protection Officer.

A disclosure can be made to them through one or more of the following avenues:

Eligible Recipients	Position	Email
Sarah Derry	CEO	Sarah@homewardboundprojects.com.au
Alfie Go	Operations Manager/ Whistleblower Protection Officer	manager@homewardboundprojects.com.au
Jodi Schmidt	Chair, Homeward Bound Board	boardchair@homewardboundprojects.com.au

Telephone:	(+613) 7020 2119
Mail:	Attention: <name of Eligible Recipient> (marked Confidential) Homeward Bound Projects Ltd C/O Spaces, Ground Floor 71 Gipps St Collingwood VIC 3095 Australia

There are other designated bodies that can receive disclosures. Such disclosures of a reportable manner may also be protected when made to:

- Australian Charities and NFP Commission (ACNC)
- the Australian Securities and Investments Commission (ASIC)
- the Australian Prudential Regulation Authority (APRA)
- another entity prescribed under the Corporations Act.

Reports Concerning a Director of the Board or the Chief Executive Officer

If the disclosure contains allegations against a Director of the Board, a report must be directed to the Chair of the Homeward Bound Board and must be reported to the Board.

If the disclosure contains allegations against the Chief Executive Officer, a report must be directed to the Chair of the Homeward Bound Board and reported to the Board.

False or Misleading Reports

Any reports made, where the person reporting is intentionally misleading or knows the information is not true, will be treated as a serious matter that could result in disciplinary action including potential termination of employment.

Where the report is found to be deliberately false or misleading, the protections under this policy or the applicable law in Australia will not be available.

Responsibilities

Whistleblowers

Protection is available to whistleblowers who make a disclosure of matters of genuine concern and on the grounds that it is reasonably believed to be the truth.

Whistleblowers will not be disadvantaged (as far as practicable) for making a report. Any adverse action, harassment, discrimination or reprisals for a report made in accordance with this policy will be treated by Homeward Bound as serious misconduct and may result in disciplinary action against the perpetrator.

To ensure that all people who make disclosures are treated fairly, protection is not available where the disclosure is trivial, vexatious or are unsubstantiated allegations that have been made maliciously, or knowingly to be false or with no substance. These will be viewed

seriously and may be subject to disciplinary action that could include dismissal, termination of service or cessation of a service or client relationship.

A whistleblower must provide information to assist any inquiry/investigation of the wrongdoing disclosed.

Making a disclosure may not protect the whistleblower if they have been involved in wrongdoing themselves; however, cooperation in the investigation and any admission may be taken into account when considering disciplinary or other action.

Eligible Recipients

Eligible Recipients will receive particulars about all whistleblower events and will undertake the following actions:

- Arrange for an investigation into the disclosures made by the whistleblower;
- Ensure appropriate agencies are notified about whistleblower events where required;
- Maintain a whistleblower register;
- Provide the Board with updates on all whistleblower matters that include the status of any investigations underway and the outcomes of any investigations completed, and actions taken because of those investigations.

Investigator

Following a whistleblower complaint being received, the Eligible Recipient/s will appoint an investigator as soon as practicable. The investigator may be internal or external to Homeward Bound and must have independence of line management of the area affected by the disclosure report.

An investigation will be undertaken which will be conducted objectively and in a manner that is fair, reasonable and appropriate about the nature of the complaint and the circumstances.

Investigations of Information Disclosed

When a disclosure that may fall under this policy is made, the following steps must be undertaken:

1. Any person who receives information that may be a whistleblower disclosure must provide the information to an Eligible Recipient as soon as practicable and where applicable deidentify the whistleblower.

2. The Eligible Recipient/s must determine whether the disclosure falls within the scope of this policy and, if so, appoint an investigator with no personal interest in the matter to investigate the affairs disclosed.

3. The investigator must conduct any investigation in an objective and fair manner, ensuring to provide any employee who has been adversely mentioned in information

provided by a whistleblower an opportunity to respond to the allegation made in respect of them prior to any finding being made.

4. Where an investigation does not substantiate the report made, the results of the investigation and identity of any person subject to the report or involved in the investigation must be handled confidentially.
5. Where the investigator believes there is a case for an individual to respond, the investigator must ensure that a person who is the subject of the disclosure:
    a. Is informed of the substance of the allegations;
    b. Is given fair and reasonable opportunity to answer the allegations before the investigation is finalised;
    c. Has their response set up fairly in the investigator's report;
    d. Is informed about the substance of any outcomes in the investigators report that may affect them;
    e. If requested, will be provided with counselling; and
    f. Where adverse outcomes are determined in an investigator's report about an individual, that individual has a right to respond to those conclusions prior to any action which may be in accordance with Homeward Bound's Disciplinary Procedure, being taken.
6. The outcome of the investigation must be reported to the Board and may be reported to the whistleblower and any persons affected as the Eligible Recipients consider appropriate.
7. The identity of a whistleblower (or information that is likely to lead to their identity becoming known) must be kept confidential at all times during and after the investigation (including in any reporting to the Board or to any persons affected). All persons responsible for or involved in an investigation must take all reasonable steps to reduce the risk that a whistleblower will be identified.
8. A whistleblower may raise any concerns or complaints regarding this policy or their treatment with the Eligible Recipient/s.

Availability of Policy

This Policy is available on Homeward Bound's website and is provided as part of the induction process to new employees and volunteers.