

WHISTLEBLOWER POLICY

PURPOSE AND AIM

John West Logistics Pty Ltd (JWL) (hereafter referred to as "the Company") is committed to maintaining a workplace culture of integrity, transparency, and accountability. We encourage the reporting of any instances of suspected unethical, unlawful, or improper conduct, and we are committed to protecting those who make such reports in good faith.

The purpose of this Whistleblower Policy is to:

- Provide a safe and confidential mechanism for individuals to report concerns about serious misconduct or improper state of affairs or circumstances.
- Outline the protections available to whistleblowers under this policy and relevant Australian legislation (e.g., Corporations Act 2001, Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019).
- Detail the process for reporting and investigating whistleblower disclosures.
- Ensure fair treatment of individuals involved in a disclosure.

SCOPE

This policy applies to all employed and contracted by the JWL Organisation, their relatives or dependants, officers and associates.

What is Reportable Conduct?

Reportable conduct includes, but is not limited to, disclosures of information where the discloser has reasonable grounds to suspect that the information concerns:

- **Misconduct:** Dishonest, fraudulent, corrupt, unethical behaviour.
- **Illegal activities:** Breach of any Australian law (e.g., theft, drug use, violence, breach of Heavy Vehicle National Law, environmental offences, bribery, tax evasion).
- **Improper state of affairs or circumstances:** Behaviour that is not necessarily illegal but indicates a significant risk to public safety, financial stability, or the Company's reputation (e.g., serious mismanagement, abuse of power, significant risk to employee health and safety, unethical practices).
- **Breaches of internal company policies:** Especially those that could cause detriment to the Company or others.
- **Serious health and safety risks:** Beyond what would be reported through standard WHS channels.
- **Concealment of any of the above**

This policy is not for general workplace grievances (e.g., interpersonal conflicts, performance management issues) which should be addressed through the Company's standard grievance procedures.

PROTECTION FOR WHISTLEBLOWERS

The Company is committed to protecting whistleblowers from any form of reprisal or detriment. Protections include:

Anonymity and Confidentiality

- Disclosures can be made anonymously.
- The identity of a whistleblower, and information that could lead to their identification, will be kept confidential, unless:
 - The discloser consents to their identity being disclosed.
 - Disclosure is required by law (e.g., to a regulatory body or for legal proceedings).
 - Disclosure is necessary to prevent a serious threat to a person's health or safety or the environment.
- Every effort will be made to protect confidentiality, even when the discloser's identity is known.

Protection from Detriment

- The Company strictly prohibits any person from causing detriment to another person because they have made or propose to make a whistleblower disclosure.
- Detriment includes, but is not limited to: dismissal, alteration of position, discrimination, harassment, intimidation, harm to reputation, or damage to property.
- Any person found to have caused detriment will face disciplinary action, up to and including termination of employment.

Immunity from Civil, Criminal, or Administrative Liability

- A whistleblower is protected from civil, criminal, or administrative liability for making a qualifying disclosure.
- This protection does not extend to a whistleblower's own misconduct that is revealed during an investigation.

Receiving and Investigating a Disclosure

Acknowledgment

- If you provide contact details, your disclosure will be acknowledged within 7 days.

Assessment

- The recipient will assess the disclosure to determine if it falls within the scope of this policy and if there are reasonable grounds for investigation.

Investigation

- If an investigation proceeds, it will be conducted fairly, impartially, and thoroughly.
- The investigation will be handled by individuals independent of the alleged misconduct.
- Every effort will be made to conduct the investigation as quickly as possible, consistent with a thorough and fair process.
- The whistleblower will not be involved in the investigation process beyond providing initial information, but may be kept informed of the general progress, subject to confidentiality considerations.

Outcomes

- Following the investigation, appropriate action will be taken. This may include disciplinary action against individuals, changes to policies or procedures, or reporting to external authorities where required.
- The whistleblower (if identifiable) will be informed of the outcome of the investigation, subject to confidentiality and privacy considerations for others involved

False and Malicious Disclosures

This policy is designed to protect genuine whistleblowers. It does not protect individuals who knowingly make false or malicious disclosures. Such actions may lead to disciplinary action.

Policy Review

This policy will be reviewed annually, or as required due to changes in legislation, Company operations, or incident findings, to ensure its continued effectiveness and compliance.

Management Commitment

John West Logistics Pty Ltd is committed to implementing and upholding this CoR Policy to ensure safe and compliant heavy vehicle operations. We expect all parties within our supply chain to share this commitment and actively contribute to a safer transport environment.