

## **SAI Global Group Whistle blowing Policy (“Policy”)**

### **1 Introduction**

The SAI Global group of companies (“SAI”) is committed to operating at the highest ethical and legal standards. The Board of Directors and management of SAI recognise that upholding these standards requires confidence on the part of all staff, contractors and suppliers that issues of concern can be raised and addressed with confidence.

This policy forms an integral part of SAI’s commitment towards providing a safe and ethical work environment, and meeting its obligations to its stakeholders, the community and the environment.

### **2 Goals, Purpose and Benefits**

This policy aims to:

- foster a culture of compliance and responsible & ethical decision making at SAI
- describe the process for making and investigating disclosures described in section 3.2
- give staff, contractors and suppliers confidence to make such disclosures
- ensure that no one will be victimised or suffer retribution because of a disclosure made in connection with this Policy
- ensure fairness for all parties, including the subject of the complaint

### **3 How the Policy Works**

#### ***3.1 Who Can Make a Report***

Any employee of SAI of any rank or employment status, any contractor working for or with SAI, or any supplier of goods or services to SAI (collectively referred to in this Policy as “you”) may make a disclosure.

#### ***3.2 When to Make a Report***

You are encouraged to make a disclosure of any actions or behaviour you genuinely believe may be:

- dishonest
- fraudulent
- corrupt
- illegal

- bullying or harassing
- represent a serious conflict of interest
- involve a misuse of sensitive or confidential information
- a miscarriage or denial, or likelihood thereof, of natural justice

### ***3.3 Level of Certainty Required Prior to Making a Report***

Generally, you are encouraged to make a report as early as possible. SAI does not expect that you will be an expert on the law nor should you conduct your own investigation. However, all reports must be made in good faith and have a factual basis.

Where you have a doubt about whether a disclosure falls within this Policy, you may discuss it informally and confidentially with the Company Secretary or the Group Director, Human Resources.

### ***3.4 How to Make a Report***

Normally, you would raise your concern with your immediate supervisor or contact at SAI. However, if, for whatever reason, you do not wish to do so, you can address your concerns to the following:

- by calling +61 8206 6806,
- writing to the Internal Auditor c/o GPO Box 5420 Sydney NSW 2001 Australia,
- emailing Group Director, Internal Audit. [kelly.chan@sai-global.com](mailto:kelly.chan@sai-global.com) or,
- by calling +61 (0) 2 8206 6000 and asking to speak to the Internal Auditor.

You may make a report anonymously but are encouraged to identify yourself to assist with the investigation. In some cases, local laws may prevent you from making an anonymous report.

Where the Internal Auditor is the subject of the disclosure, you may address the disclosure to the Company Secretary, Group Director Human Resources or the Chief Executive Officer.

## **4 What Happens When I Make a Report?**

### ***4.1 Investigation Process***

Upon receipt of a disclosure, a disclosure will be referred to the Investigative Officer. Usually, this will be the Internal Auditor. Where the Internal Auditor is, for whatever reason, unable to conduct the investigation impartially or effectively, or their involvement in the investigation may create a perception of bias, the Chief Executive Officer, or, alternatively, the Board of Directors, will appoint an independent Investigative Officer.

The Investigative Officer will decide whether to commence an investigation into the disclosure. The Investigative Officer may seek further information from the whistleblower or other persons in the course of the investigation but must remember at all times the importance of protecting the identity of the whistleblower.

The exact nature and outcome of an investigation will depend on the nature of the disclosure and may involve liaison with external organisations such as the police, corporate regulators or industry accreditation bodies.

#### ***4.2 Protection of Whistleblowers***

When a disclosure is received and an investigation is commenced, SAI will appoint a Whistleblower Welfare Officer. This person will usually be the Company Secretary or the Group Human Resources Director. The Whistleblower Welfare Officer will not be involved in investigating the disclosure. Rather, he or she will focus on assisting and supporting the whistleblower and liaising with them regarding the investigation.

Maintaining the confidentiality of a whistleblower is paramount. SAI Global and its personnel, including each of the officers involved in investigating a disclosure or dealing with a whistleblower will do everything reasonably possible to ensure that this person's identity will remain confidential and will not be disclosed unless required by law.

Where, because of the nature of the disclosure, or because of cooperation with law enforcement authorities, it is not possible to maintain a whistleblower's confidentiality, the Whistleblower Welfare Officer will inform the whistleblower as soon as possible and work with them to minimise the impact of the loss of confidentiality.

The assistance SAI may be able to provide to the whistleblower includes:

- a leave of absence
- relocation to another role or office whilst maintaining pay and seniority
- provision of counselling services.

#### ***4.3 Commitment to Keep Whistleblower Informed***

The Whistleblower Welfare Officer will provide regular feedback to a whistleblower concerning the progress of the investigation and any action taken in relation to his or her disclosure.

#### ***4.4 No Recriminations against Whistleblowers***

Whistleblowers will not suffer recriminations as a result of their disclosure. Some examples of recrimination include:

- loss of job
- physical or psychological abuse or threats
- demotion of role, pay or entitlements
- current or future bias within the company
- loss or risk of loss of contracts or business with SAI

SAI cannot provide immunity from any civil or criminal legal liability resulting from the actions of a person making a disclosure under this Policy.

#### ***4.5 Consequences of Making Malicious Misuse of Reporting Process***

The effectiveness of this Policy rests on the good faith and high ethical standards from all stakeholders. Any disclosure must be made in good faith. Any person found to have made a disclosure with the deliberate, malicious intent of harming another person or organisation may lose benefits available under this Policy, or be subject to disciplinary or legal action.

### **5 Review of Program**

SAI will review the operation of the policy periodically to ensure that it meets its goals and remains effective.

### **6 Compliance with Local Laws**

SAI will comply with local laws in the conduct of this Policy.

### **7 Complementary Documents**

This policy complements SAI Global's Code of Business Conduct, SAI Global's (Anti) Harassment Policy and SAI Global's Purpose, Vision and Values.