

BACKGROUND

Broadspectrum Limited (Broad Spectrum) is a public company, listed on the Australian Securities Exchange (ASX). Broad Spectrum is committed to responsible corporate governance, including ensuring that a fair, consistent and effective process is in place to investigate concerns raised about inappropriate conduct within the organisation.

Accordingly, the Board has endorsed this Internal Investigations Policy to support the Broad Spectrum Code of Business Conduct and our governance framework. References in this Policy to Broad Spectrum include its related entities.

PURPOSE OF THIS POLICY

The purpose of this Policy is to:

- ▶ Outline what matters may be subject to internal investigations conducted by the Audit Services and Risk Group
- ▶ Outline who is responsible for the conduct of internal investigations, including where outsourcing of the investigation process may be required
- ▶ Describe the key principles governing the conduct of an internal investigation
- ▶ Ensure investigations are carried out fairly and lawfully, and in a prompt and comprehensive manner
- ▶ Provide clarity to Broad Spectrum directors, officers, employees, consultants and contractors (Employees for the purpose of this Policy) in relation to their involvement in any investigation process
- ▶ Protect Employees and the Company from risks arising out of the investigation process, and
- ▶ Ensure that inappropriate conduct is addressed appropriately and prevented in the future.

SCOPE

This Policy applies to all Broad Spectrum Employees or any other parties acting as representatives or agents of Broad Spectrum. The Policy also extends to all our majority-owned operations in all countries in which we or our subsidiaries operate.

POLICY

Broad Spectrum takes all reports of alleged Inappropriate Conduct seriously. Prompt action will be taken to investigate each report received to ensure Inappropriate Conduct is addressed appropriately. Internal investigations will be conducted in an objective and comprehensive manner and within the scope of applicable laws.

Where the police or a government or regulatory body is involved in an internal investigation, the conduct of the investigation may differ to the process outlined in this Policy. In this case,

Broadspectrum and Employees will co-operate with the lawful activities and requests of the investigating body.

INAPPROPRIATE CONDUCT

For the purpose of this Policy, Inappropriate Conduct means serious conduct which is, or potentially could be:

- ▶ A criminal offence (including theft, violence or threatened violence and criminal damage to property)
- ▶ Dishonest, fraudulent or corrupt, or
- ▶ Aimed to conceal business records related to any of the above.

ROLE OF THE AUDIT SERVICES AND RISK GROUP

Matters involving Inappropriate Conduct are to be referred to the Audit Services and Risk Group. Business units and management must not commence their own internal investigations in relation to the above.

The Audit Services and Risk Group is responsible for ensuring that Broadspectrum investigates and appropriately resolves legitimate reports of Inappropriate Conduct. Following receipt of a complaint or discovery of information in relation to Inappropriate Conduct, the Audit Services and Risk Group makes preliminary inquiries to determine whether a full internal investigation is necessary or whether an alternative process is appropriate (for example, management pursuing own inquiries, dispute or grievance procedures or other disciplinary measures).

Where a report of Inappropriate Conduct does not actually or potentially involve criminal, dishonest, fraudulent or corrupt conduct, this will be addressed by other business units, such as Human Resources or Labour Relations.

Where a decision is made to proceed with an investigation, the Audit Services and Risk Group will determine the scope of the investigation, taking into account factors such as the potential severity of the alleged Inappropriate Conduct, the potential impact on the Company, as well as the importance of confidentiality and professional privilege.

The Audit Services and Risk Group will engage with Human Resources or Labour Relations staff where an investigation relates or may relate to a personnel issue, where employment related consequences may arise, or where Human Resources or Labour Relations assistance or expertise may be required. Other functions, such as Finance, may also be consulted with as necessary.

Where a decision is made not to proceed with an internal investigation, the reasons for this determination are documented.

OUTSOURCING THE INVESTIGATION

The Audit Services and Risk Group will refer an allegation of Inappropriate Conduct to an external investigator where:

- ▶ A member of the Audit Services and Risk Group has a conflict of interest with the subject matter of the internal investigation (for example, due to the need to examine close colleagues or peers or another personal bias)
- ▶ Allegations of Inappropriate Conduct involve a director, including the Managing Director, or pose substantial and immediate risk to the well-being of the Company
- ▶ The Audit Services and Risk Group does not have the capacity to conduct its own investigation (for example, due to resource or specialised expertise availability).

Where an investigation relates to a director, including the Managing Director, of Broadspectrum, the matter will be referred to the Chairman of the Risk, Audit and Compliance Committee. The investigation will be conducted by an external investigator and managed under the guidance of the Chairman of this Committee.

External organisations and individuals may also be appointed for conducting specific components of an internal investigation, such as data analytics, data recovery and the provision of expert opinions.

In some cases, an allegation of Inappropriate Conduct may be referred to the police, or a government or regulatory body.

COLLECTION OF RELEVANT INFORMATION

An effective internal investigation relies on a thorough collection of information. The Audit Services and Risk Group (the Group) is able to:

- ▶ Search any locations or property belonging to the Company
- ▶ Interview Employees, and
- ▶ Collect any Company documents and records that it considers to be reasonably connected with its investigation.

Information is gathered legitimately, consistently, in a non-discriminatory manner and with due regard to privacy and other lawful considerations.

The Group can gain unfettered access to and retain copies of any relevant Company documents and records, including policies, handbooks, personnel files, employment letters, performance review documents, files and file notes, agreements, accounting records, expense reports, invoices and bills, and records from prior investigations.

The Group is also able to gain access to electronic records of the Company, including emails, computer and server data, and internet access records, as well as conduct video surveillance of Company locations where permissible by law. Where necessary, a third party may be engaged to conduct specific searches and surveillance for an internal investigation.

The Group is able to conduct confidential interviews with Employees who may have seen, heard or otherwise perceived events relevant to the investigation or who may be able to authenticate a relevant document or item. Employees subject to the investigation may also be interviewed. An

Employee will have the opportunity to have an independent third party present during the conduct of any interviews.

Employees are required to co-operate with the lawful requests of the Audit Services and Risk Group.

The Audit Services and Risk Group has no power to search Employees' personal possessions (such as wallets and handbags) their clothing, body, private vehicle or Employee's homes. However, Employees must provide all requested Company documents and other evidence, including where the documents and other evidence are located in personal possessions.

ROLE OF MANAGEMENT

Managers play a crucial role in the conduct of internal investigations. Managers must co-operate with the Audit Services and Risk Group in the conduct of an investigation in their business unit and prevent compromising the investigation or hindering its process. Managers must not undertake their own investigations, unless agreed to with the Audit Services and Risk Group. Routine procedures for notifying staff and logging access to Company records and other documents may need to be waived to maintain confidentiality of a particular investigation. Any interference or impediment of such an investigation will be treated as serious misconduct.

In certain situations, the Audit Services and Risk Group may not be in a position to provide managers with advance notice of an internal investigation taking place or with details about the investigation. The Group may also escalate an investigation to the next level of management, if necessary.

Following the conclusion of an internal investigation, managers will often be required to act on the recommendations of the final report to minimise the risk of Inappropriate Conduct in the future.

INFORMING AUTHORITIES, AUDITORS AND INSURERS

In the conduct of an internal investigation, certain information may indicate that a person was engaged in criminal or corrupt conduct or some other conduct that requires the Company to pass on the information to another organisation, such as the police or an anti-corruption body. Withholding such information may constitute an offence. In some situations, the Company's auditors and/or insurers must also be notified of an allegation of Inappropriate Conduct or of an investigation taking place.

The Audit Services and Risk Group notifies the relevant authorities, auditors and/or the insurers at an appropriate stage, following consultation with the Chief Risk and Legal Officer.

FINAL REPORT

Once all relevant information has been collected, the Audit Services and Risk Group objectively reviews the information and makes a credible and sound determination on the alleged Inappropriate Conduct. The relevant information and the conclusions are presented in a final report, which generally also includes a range of recommendations, actions, and potential disciplinary measures as agreed with appropriate line or senior management.

The final report will not contain conclusions about whether someone has committed or is guilty of a criminal offence, but may note that there is sufficient evidence to warrant referring an incident to the police.

The final report will be circulated to a limited number of appropriate line or senior management to maintain confidentiality. Details of the investigation will also be circulated to the Risk, Audit and Compliance Committee and the Company's auditors.

Where appropriate, the Audit Services and Risk Group may inform the individual raising the allegation of Inappropriate Conduct, and/or others involved in the internal investigation, of the outcome of the internal investigation and actions taken. Where an investigation suggests that the allegation was baseless, the Employee raising the claim may be subject to disciplinary action.

MAINTAINING CONFIDENTIALITY

Confidentiality must be maintained and emphasised by Audit Services and Risk Group throughout the conduct of an investigation to maintain confidence in the integrity of the process. Any third parties engaged in internal investigations are also required to maintain utmost confidentiality.

The loss of confidentiality may pose significant risks to the Company and the individuals involved in the internal investigation, including the risk of reputational damage and legal action based on defamation or harassment claims.

MAINTAINING BUSINESS RECORDS

In accordance with the Broadspectrum Code of Business Conduct, the Audit Services and Risk Group keeps complete and accurate records pertaining to an internal investigation to the extent required by relevant laws and subject to safeguards that ensure their confidentiality. Thorough and complete documentation demonstrates the thoroughness and accuracy of the investigation process.

Records obtained or generated during an internal investigation are stored securely to avoid loss, damage or contamination to preserve the records' integrity.

REPORTING

The Audit Services and Risk Group summarises the activities under this Policy on a quarterly basis to the Risk, Audit and Compliance Committee.

TRAINING AND COMMUNICATION

Broadspectrum regularly communicates this Policy to Employees across Broadspectrum through our established communication channels. Employees will also receive regular training on supporting this Policy in the scope of their employment with Broadspectrum. Employees who have not received

comprehensive training on conducting internal investigations will not be able to handle a complaint of Inappropriate Conduct.

REVIEW OF THIS POLICY

The Executive General Manager – Audit Services and Risk is responsible for keeping this Policy up to date. A formal review of this Policy takes place annually.

This Policy will be submitted for review by the Risk, Audit and Compliance Committee of Broadspectrum, who will make recommendations to the full Board. The Board is responsible for approving this Policy.

RELATED DOCUMENTS

This Policy should be read in conjunction with Broadspectrum' other policies including:

[Code of Business Conduct](#)

[Whistleblower Policy](#), and

Applicable Human Resources policies and procedures

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