

## Background

Broadspectrum Limited (**Broadspectrum**) is a public company, listed on the Australian Securities Exchange (**ASX**). Broadspectrum is committed to responsible corporate governance, including ensuring that appropriate processes are in place to encourage employees and representatives of Broadspectrum raising concerns about inappropriate conduct within the organisation. Accordingly, the Board and senior management has endorsed this Whistleblower Policy to support the Broadspectrum Code of Business Conduct and compliance and governance framework.

## Purpose of this Policy

The purpose of this Policy is to:

- ▶ promote the responsibility of Broadspectrum directors, officers, employees, consultants and contractors (**Employees** for the purpose of this Policy) and any other parties acting as representatives or agents of Broadspectrum (**Representatives**), to report inappropriate conduct within the organisation
- ▶ outline the channels through which inappropriate conduct can be reported
- ▶ outline the process for dealing with reports of inappropriate conduct
- ▶ encourage Employees and Representatives to report inappropriate conduct by emphasising the protections offered to those who do so in good faith, and
- ▶ ensure that inappropriate conduct is detected, addressed appropriately and prevented in the future.

## Scope

This Policy applies to all Broadspectrum:

- ▶ Employees and Representatives, and
- ▶ wholly owned and majority-owned operations in all countries in which Broadspectrum operate. References in this Policy to Broadspectrum include its related entities. Where Broadspectrum has a minority interest, it requires compliance with the minimum requirements set out in this Policy, recognising that the manner in which these requirements are met by Business Partners<sup>1</sup> may vary. References in this Policy to Broadspectrum include its related entities.

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<sup>1</sup> *Business Partners* has the meaning in the Broadspectrum Business Partners Policy

## Sources of legal obligations

The sources of legal obligations for this Policy are the local and international laws aimed at protecting employees (including representatives) who call attention to corporate violations and assist with enforcement proceedings.

## Company commitment

Broadspectrum encourages Employees and Representatives to exercise their responsibility to raise concerns about any known or suspected unlawful or inappropriate conduct within the organisation.

To support this commitment and promote an open working environment, Broadspectrum offers Employees and Representatives a mechanism outlined in this Policy to confidentially raise serious concerns without fear of reprisal, dismissal or discriminatory treatment. Prompt and appropriate action will be taken to investigate each report received to ensure inappropriate conduct is detected and addressed appropriately.

## Inappropriate conduct

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

- ▶ a criminal offence (including theft, drug use/sale, violence or threatened violence and criminal damage to property)
- ▶ a breach of a legal obligation
- ▶ dishonest, fraudulent or corrupt
- ▶ a serious risk to the health of an individual or the general public or to the environment
- ▶ a violation of regulatory requirements in relation to the environment
- ▶ in breach of the Code of Business Conduct and/or any of the Company's policies, or
- ▶ aimed to conceal business records or other evidence related to any of the above.

## Protected disclosure

An Employee and Representative who reports Inappropriate Conduct in accordance with this Policy (**Whistleblower**) will be protected under this Policy from reprisal or repercussions from the Company as a result of reporting Inappropriate Conduct, as long as the disclosure is made in good faith and based on reasonable grounds.

Where a Whistleblower's report of Inappropriate Conduct is determined to be in bad faith, maliciously false or unreasonable, the Whistleblower will be subject to disciplinary action which may include summary dismissal when permitted by law.

## Reporting inappropriate conduct

Where an Employee and Representative is concerned about Inappropriate Conduct observed within the organisation, he or she can discuss it with an immediate manager/supervisor at first instance. However, where the Employee and Representative feels uncomfortable in raising a concern in this manner or is unsatisfied with the response received, the concern can be raised either internally or externally as outlined below.

Inappropriate Conduct can be referred to the Broad Spectrum's Audit Services and Risk Group using the information detailed below:

**Telephone:** +61 3 8823 7540  
**Mobile:** +61 419 522 335  
**Email:** [internalaudit@broadpectrum.com](mailto:internalaudit@broadpectrum.com)

In instances where a Whistleblower wishes to remain anonymous, he or she can call the Whistleblower and Integrity Hotline, (which is operated by an external service provider) using the information detailed below:

International: +61 3 6388 8362  
Australia: 1 800 819 877 (free call)  
New Zealand: 0 800 888 147 (free call)  
North America: 866 993 9608 (free call)  
Chile: 800 835 031 (free call)  
Republic of Nauru: +674 554 1900 (local call)  
Manus Island: +675 7070 7238 (local Call)  
Email: [brswhistleblower@deloitte.com.au](mailto:brswhistleblower@deloitte.com.au)

Where a Whistleblower contacts the Whistleblower and Integrity Hotline, the external service provider who receives the call makes a record of all disclosed information. A Whistleblower who reports Inappropriate Conduct to a government agency in compliance with local law, will continue be protected under this Policy.

The Whistleblower may choose to either identify themselves or remain anonymous. The external service provider then refers the matter to the Audit Services and Risk Group.

Once the Audit Services and Risk Group receives a notification about the Inappropriate Conduct (either directly or through the Whistleblower and Integrity Hotline), it undertakes an investigation to determine whether there is evidence to support the matter raised and/or what further action, if any, is to be taken.

Further information on the investigation process is found in the Internal Investigations Procedure.

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## Consequences for breach of the Policy

All reasonable steps will be taken by the Audit Services and Risk Group to maintain the confidentiality of Whistleblowers. This means that details of the Whistleblower will only be released to persons who have a “need to know” – usually arising from an obligation to investigate or to take remedial or disciplinary action.

In limited circumstances, Broadspectrum may be required to disclose the identity of the Whistleblower, details of the Inappropriate Conduct or information that may lead to the identification of the Whistleblower – including where it is required by law and where it is necessary to prevent or mitigate a serious threat to a person’s health and safety.

Whistleblowers who do not wish to disclose their identity may remain anonymous when reporting Inappropriate Conduct to the Whistleblower and Integrity Hotline. However, anonymity of a Whistleblower may impede a swift or thorough investigation into the Inappropriate Conduct or the outcome of a subsequent prosecution.

In addition to the maintenance of confidentiality, Broadspectrum is committed to protecting genuine Whistleblowers against actions taken against them for reporting Inappropriate Conduct. The Company does not tolerate any reprisals, discrimination, harassment, intimidation or victimisation against a Whistleblower, his or her colleagues or family members. Such retaliatory action will be treated as serious misconduct and will be dealt with in accordance with the Company’s disciplinary procedures. Retaliatory action may also constitute an offence under some laws, and may lead to a financial penalty or imprisonment.

Where a Whistleblower is implicated in the Inappropriate Conduct being reported, and co-operates with Broadspectrum’s investigation, the fact that he or she has reported Inappropriate Conduct in accordance with the Policy may be a mitigating factor when determining disciplinary action to be taken against them.

## Feedback and communication with the whistleblower

Where possible, and assuming the Whistleblower is not anonymous, Broadspectrum will keep the Whistleblower informed of the outcome of the investigation into the Inappropriate Conduct, subject to confidentiality considerations.

## 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 a report of Inappropriate Conduct to the extent required by relevant laws and subject to safeguards that ensure their confidentiality.

## 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 and Representatives across Broadspectrum through established communication channels. Employees and Representatives will also receive regular training on supporting this Policy in the scope of their employment or contract with Broadspectrum.

## Review of this Policy

The Executive General Manager Group Audit Services and Risk is responsible for keeping this Policy up to date. A formal review of this Policy will occur every two years or earlier as a result of changes in law or regulation.

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's other policies including:

- [Code of Business Conduct](#)
- [Conflicts of Interest Policy](#)
- [Business Partners Policy](#), and
- [Privacy Policy](#)

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