

WHISTLEBLOWER

RELATED POLICIES AND DOCUMENTS:

QUEST

Risk

Fraud

Values

Introduction

Toxfree is committed to creating and maintaining a work environment that encourages and facilitates the disclosure of Reportable Conduct by ensuring that complaints and disclosures, including those made anonymously, are properly assessed and where appropriate, dealt with, reviewed or investigated thoroughly and impartially whilst maintaining confidentiality.

Objectives

The objective of this policy is to encourage staff to report any Reportable Conduct in good faith and in an environment free from victimisation so that the Board and Senior Management can adequately manage risk and cultural issues within Toxfree.

Who is a “Whistleblower”?

A person whether anonymously or not, makes a report in connection with reportable conduct and where the whistleblower wishes to avail themselves or protection against reprisal for having made the report. A whistleblower may or may not wish to remain anonymous.

What is “Reportable Conduct”?

Conduct by a person or persons connected with Toxfree which, in the view of a whistleblower acting in good faith is:

- Dishonest
- Fraudulent
- Corrupt
- Illegal (including theft, drug sale/use, violence or threatened violence and criminal damage against property)
- In breach of Commonwealth or state legislation or local authority by-laws
- Unethical
- Other serious improper conduct
- An unsafe work-practice or
- Any other conduct which may cause financial or non-financial loss to the entity or be otherwise detrimental to the interest of the entity

Reporting Principles

Staff members can report Reportable Conduct in the following ways:

1. Direct Line of Management
2. Anonymous Disclosure

Direct line of Management

Depending on the nature of the Reportable Conduct, the staff member is encouraged to first discuss their concern with their Manager. Any staff member that submits or receives a report must treat the matter confidentially.

If the staff member does not feel comfortable speaking with their Manager, they can raise the conduct via an anonymous disclosure

Anonymous Disclosure

Toxfree also recognises that staff may prefer to bypass their Direct Line of Management in certain circumstances, including but not limited to, the following.

- they believe they may be victimised if they use a normal reporting channel; or
- they prefer to make the report anonymously.

To ensure these staff can raise Reportable Conduct four anonymous reporting channels have been set up. They are detailed below:

- Telephone disclosure
- Written disclosure
- Email disclosure
- On-line disclosure

The number is 1300 304 550 or report online at www.toxfree.stoplinereport.com

External Disclosure

Disclosures may also occur direct to an external regulatory body such as WorkSafe or the EPA.

Immunity from Disciplinary Action

Whistleblower acting in good faith and who has not him or herself engaged in serious misconduct or illegal conduct, may be provided with immunity from Toxfree disciplinary proceedings.

Investigation of Reportable Conduct

Investigations of Reportable Conduct will be conducted in a manner that is confidential, fair and objective. The investigation processes will vary depending on the nature of the Reportable Conduct and the amount of information provided.

For a report to be investigated, it must contain sufficient information to form a reasonable basis for investigation. A staff member reporting anonymously should provide as much information as possible so as not to compromise the ability to fully investigate the report

Stephen Gostlow