

## WHISTLEBLOWER POLICY

### 1. Purpose and scope

Service Stream is committed to maintaining a high standard of corporate governance through a culture of strong ethical behaviour and corporate compliance. Employees and subcontractors must fulfil their roles and responsibilities with honesty and integrity.

The objectives of this Policy are:

- ▶ to encourage directors, employees, suppliers, contractors, tenderers or any person who has business dealings with Service Stream, to raise any concerns and report any instances of unethical, illegal, fraudulent or other undesirable conduct where there are reasonable grounds to suspect such conduct has occurred;
- ▶ to provide an appropriate procedure for individuals to report such conduct in the knowledge they can act without fear of intimidation, disadvantage or reprisal; and
- ▶ to ensure that any person who, in good faith, makes a report in accordance with this policy (a Whistleblower) is appropriately protected from any Detrimental Action (as defined in this Policy).

### 2. What is reportable conduct

In this Policy, Reportable Conduct means conduct on the part of a Service Stream director, officer, employee, contractor, or any person who has business dealings with Service Stream (in the context of those dealings with Service Stream), whether actual or suspected, which an individual honestly believes on reasonable grounds:

- ▶ is dishonest, fraudulent or corrupt, or involves bribery or corruption, or otherwise amounts to an abuse of authority;
- ▶ is illegal, including theft, drug sale or use, violence, or threatened violence, harassment, intimidation, or criminal damage to property;
- ▶ is in breach of Commonwealth or state legislation or local authority by-laws;
- ▶ is unethical, including dishonestly altering company records or data, adopting questionable accounting practices, or the unauthorised disclosure of confidential information;
- ▶ breaches Service Stream's Code of Conduct or other Service Stream policies;
- ▶ is potentially damaging to Service Stream, a Service Stream employee or a third party, such as unsafe work practices, environmental damage, health risks or substantial wasting of company resources; or
- ▶ may cause financial or non-financial loss to Service Stream, damage its reputation or be otherwise detrimental to Service Stream's interests.

Reportable Conduct does not include conduct that is dealt with, and therefore more appropriately raised, under an alternative policy. For example, conduct prohibited by Service Stream's policies about workplace conduct (such as the Standards of Behaviour Policy) should be made, and will be handled, in accordance with those other policies.

This Policy is not designed to replace normal communication channels between management and employees to address questions, concerns, suggestions or complaints. If employees have any concerns about what is proper conduct for themselves or others, it is expected they will raise their concern. In most instances the employee's immediate supervisor is in the best position to address an area of concern. Serious matters or matters not satisfactorily resolved should be escalated through appropriate management channels in the normal course of business.

### 3. Individuals reporting conduct must act in good faith

Service Stream supports measures enabling disclosure of Reportable Conduct based on honesty, integrity and ethical behaviour. A 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 disciplinary proceedings.

Service Stream cannot provide immunity from civil penalties or criminal prosecution.

Before conduct is reported, there must be a genuine and well-founded belief that there has been wrongdoing. Individuals must not make malicious reports or knowingly provide false or misleading information regarding Reportable Conduct or Detrimental Action. The making of a malicious report or the provision of knowingly false or misleading information may result in disciplinary action up to and including termination of employment.

#### 4. Making a report

Reportable Conduct can be reported to Service Stream's Whistleblower Protection Officer (WPO) via one of the methods listed below. The WPO is currently General Counsel.

<b>Phone:</b>	(03) 9677 8872
<b>Email:</b>	whistleblower@servicestream.com.au
<b>Mail:</b>	The Whistleblower Protection Officer Service Stream Limited Level 4, 357 Collins Street Melbourne Vic 3000

The WPO will review reports and direct those that require further investigation to the Whistleblower Investigations Officer (WIO).

If the Whistleblower wishes to remain anonymous, he or she may do so.

Where a report is not made anonymously, all reasonable steps will be taken to keep the identity of the Whistleblower confidential as far as possible. Details of the Whistleblower will only be released to persons who have a "need to know".

All information provided by a Whistleblower will be treated as confidential and maintained securely. Any breach of confidentiality will be treated as a serious disciplinary matter.

In limited circumstances, Service Stream may be required to disclose the identity of the Whistleblower, details of the Reportable Conduct or information that may lead to the identification of the Whistleblower, including where required by law and where necessary to prevent or mitigate a serious threat to a person's health and safety.

## 5. Whistleblower Protection

A Whistleblower who:

- ▶ believes on reasonable grounds that a Service Stream officer, employee or contractor has engaged, or plans to engage, in Reportable Conduct; and
- ▶ reports that matter in accordance with section 4 of this Policy,

must not be subjected to Detrimental Action for reporting the Reportable Conduct.

In this Policy, Detrimental Action includes:

- ▶ action causing injury, loss or damage;
- ▶ intimidation, bullying or harassment;
- ▶ discrimination or other adverse treatment in relation to the Whistleblower's employment, career, profession, trade or business, including dismissal, demotion or the taking of other disciplinary action;
- ▶ current or future bias; or
- ▶ any conduct which incites others to subject the Whistleblower to any of the above conduct.

Part of the role of the WPO is to safeguard the interests of Whistleblowers and to ensure the integrity of the whistleblowing mechanism.

If a person (whether the Whistleblower or not) believes on reasonable grounds that the Whistleblower has been, or is likely to be, subjected to Detrimental Action, he or she should report this to the WPO, who will investigate, or arrange an investigation into, the matter.

A Service Stream employee who is found to have subjected a Whistleblower to Detrimental Action will be subject to disciplinary action (which may include termination of employment) and may be guilty of an offence that is subject to prosecution under legislation.

## 6. Investigation

Service Stream has appointed a designated Whistleblower Investigation Officer (WIO) whose role is to investigate all cases of Reportable Conduct made under this policy as soon as possible after the matter has been reported. If appropriate, an external investigator may be appointed to conduct the investigation.

Investigations will be conducted in a timely, thorough, confidential, objective and procedurally fair manner as is reasonable and appropriate having regard to the nature of the Reportable Conduct and all of the circumstances.

## 7. Feedback

Provided the identity of the Whistleblower is known or can be contacted, the Whistleblower will, where possible, be kept informed of the progress and outcomes of the investigation, subject to considerations of confidentiality and of the privacy of those against whom allegations are made.

All Whistleblowers must maintain the confidentiality of such information and not disclose details to any person.

  
**Managing Director**

Date 6/12/16

