

Whistleblower Policy (External)

1 Purpose and Objective

Housing Plus is committed to ethical behaviour that is aligned with our values and complies with all relevant laws. To demonstrate our commitment, in addition to our internal reporting procedures, our Whistleblower Policy has been developed to provide guidance for a person associated with Housing Plus to disclose actual or suspected wrongdoing outside existing internal reporting procedures.

A person making a Whistleblower disclosure is expected to have reasonable grounds for believing that serious misconduct has occurred, or that an improper state of affairs exists with respect to Housing Plus.

Housing Plus is committed to providing a supportive environment for any person making a Whistleblower disclosure. In particular, persons making a disclosure can expect that:

- Their identity will remain confidential at all times to the extent permitted by law or that is practical in the circumstances.
- They will be protected from detrimental conduct, including retaliation, harassment, and victimisation.
- If retaliation, harassment or victimisation or other detrimental conduct occurs, it will be treated as serious misconduct.

Whistleblower disclosures made under this Whistleblower Policy will be properly assessed and, if necessary, appropriately investigated.

Housing Plus is required to comply with the provisions of the *Corporations Act 2001 (Cth)* – protection for Whistleblowers.

Policy Objectives

This Whistleblower policy documents the governance mechanisms that Housing Plus must implement and maintain, in order to ensure that Whistleblowers are made aware of their rights and feel comfortable that they can make a Whistleblower disclosure without fear of recrimination or reprisal.

The objectives of our Whistleblower Policy are to:

- Encourage the reporting of actual or suspected wrongdoing that may materially damage Housing Plus's reputation and/or cause material financial or non-financial loss to Housing Plus, or serious harm to individuals or the environment.
- Provide clearly articulated guidance on how to disclose actual or suspected wrongdoing.
- Provide a safe and confidential environment where individuals can raise reasonable concerns without fear of reprisal, even if their suspicions are not confirmed on investigation.
- Enable Housing Plus to effectively deal with Whistleblower disclosures in a transparent and timely way that protects the identity of the Whistleblower, provides fair treatment to persons named in Whistleblower disclosures, facilitates appropriate investigation of Whistleblower disclosures and provides for the secure storage of the information provided and gathered.
- Establish policies and procedures for protecting Whistleblowers against reprisal.
- Provide for the appropriate governance infrastructure to allow Housing Plus to effectively implement and maintain our Whistleblower procedures.

2 Scope

- a. This policy applies to all external stakeholders (including but not limited to contractors, customers, suppliers, creditors, relatives, and friends of Housing Plus Employees or Board Members).
- b. This policy describes the organisation's objectives and policies regarding external whistleblowing.

- c. This policy does not apply to Employees, Board Members and any other groups covered by Housing Plus' internal Whistleblower policy.

3 References

- a) *Corporations Act 2001* (Corporations Act).
b) *ASX Corporate Governance Principles and Recommendations*.
c) *Taxation Administration Act 1953* (Cth).

4 Responsibilities

Key roles and responsibilities

Housing Plus has identified the following roles and responsibilities relevant to the overall implementation and management of its Whistleblower Policy.

It is important that the roles of the Whistleblower officer and the Whistleblower investigator(s) are not held by the same person. These roles should operate, and be seen to operate, independently.

- The Housing Plus Board
- Chief Executive Officer (CEO)
- Whistleblower Manager – Chief Executive Officer
- Whistleblower Officer – Governance Manager
- Whistleblower Investigator(s) to be appointed on a case by case basis
- External independent whistleblowing hotline service provider – Your Call
- Whistleblowers

5 Policy

A Whistleblower is a person who makes a disclosure, outside our existing internal reporting procedures, whether anonymously or not, with respect to serious misconduct such as corruption, fraud or other illegal or undesirable activity.

We recognise that people who have a work, service or customer relationship with Housing Plus are often best placed to identify illegal or other undesirable activity. Without a Whistleblower policy, people who see or suspect serious wrongdoing may remain silent for various reasons, including that:

- There is no clear mechanism for them to speak up.
- They are concerned that they may not have sufficient evidence to support their disclosure.
- They believe action will not be taken; and/or
- They believe that they may suffer detriment if they report the matter.

Whistleblower Manager

Our Whistleblower Manager has a direct communication line with the Executive and the Chair of the Housing Plus' Board to satisfy the objectives of our Whistleblower policy.

Our Whistleblower Manager is responsible for:

- Effectively implementing our Whistleblower policy.
- Recommending the appointment of a Whistleblower Officer to the Housing Plus Board for approval.
- Recommending the appointment of the external independent whistleblowing hotline service provider – your call to the Housing Plus Board for approval.
- Appointing Whistleblower investigator(s) (whether internal or external).
- Promoting a culture within Housing Plus that supports transparency of and accessibility to our Whistleblower policy, as well as its effective operation.
- Ensuring that our Whistleblower policy is published on Housing Plus's public website and is easily accessible.

- Ensuring that each Whistleblower disclosure received is appropriately investigated by a Whistleblower Investigator(s).
- Where appropriate, providing regular reports to the Board including the number, nature and status of any Whistleblower disclosures that have been received through our Whistleblower policy.
- Where appropriate, providing a report to the Board on any corrective action taken as a result of a Whistleblower disclosure.
- The overall maintenance of our Whistleblower policy to ensure its continued currency and practical application.
- Ensuring that all new Directors and Employees receive training.

David Fisher – Chief Executive Officer, has been appointed as Housing Plus' Whistleblower Manager.

Whistleblower Officer

The Whistleblower Officer is responsible for:

- Receiving Whistleblower disclosures via Your Call, our external independent whistleblowing hotline service provider, and where practical, and/or appropriate, maintaining communications with the Whistleblower through Your Call.
- Providing protection and support to the Whistleblower in accordance with our Whistleblower policy (refer to protection and support of Whistleblowers)
- Respecting and protecting Whistleblower's anonymity (if anonymity is desired by the Whistleblower).
- Ensuring that each disclosure received is appropriately investigated by a Whistleblower investigator(s).
- Where appropriate, provide assistance to the Whistleblower investigator(s) in carrying out the investigation.
- Storing all information and documents relevant to the investigation securely.
- Providing regular reports to the Whistleblower Manager with respect to Whistleblower activities.

Housing Plus has appointed the following Whistleblower Officer:

Name: Anthea Basha
 Role: Governance Manager
 Email: anthea@Housingplus.com.au

Whistleblower Investigator(s)

Whistleblower Investigator(s) are appointed by the board and are assigned to Whistleblower disclosures by the Whistleblower Manager on a case-by-case basis depending on the particular circumstances of the Whistleblower disclosure.

Whistleblower Investigator(s) can be internal or external, however they must have appropriate qualifications and experience to conduct the investigation. Any internal investigator who is appointed must be independent and cannot be the Whistleblower Officer for the matter.

External Independent Whistleblowing Hotline Service Provider

Housing Plus has appointed Your Call as our external independent whistleblowing hotline service provider to give the opportunity for a Whistleblower to make a disclosure completely independently of the Housing Plus Board, Executive and Senior Management Team.

The role of the external independent whistleblowing hotline service provider is to:

- Establish a secure and easily accessible mechanism for individuals to make Whistleblower disclosures.
- Receive Whistleblower disclosures and gather the information necessary in order to allow an investigation to commence.
- Respect and protect Whistleblower anonymity (if anonymity is desired by the Whistleblower).

- Report all Whistleblower disclosures to our Whistleblower Manager and Whistleblower officer, unless one of these individuals is implicated in the disclosure.
- Where appropriate, aid the Whistleblower Investigator(s) in carrying out the investigation.
- Store all information and documents relevant to the investigation securely.
- Provide regular reports to the Whistleblower Manager with respect to Whistleblower disclosures.

Whistleblowers

Our Whistleblower Policy is designed to deal with matters that are of a serious nature that cannot be reasonably handled through existing internal reporting procedures.

A person making a Whistleblower disclosure is expected to:

- Have reasonable grounds for believing or suspecting that wrongdoing has occurred or will occur.
- Not use the Whistleblower service to report trivial or vexatious matters, or matters they know to be false.

Types of conduct to be reported

Our Whistleblower Policy is designed to capture actual or suspected wrongdoing that the person providing the Whistleblower disclosure:

- Has reasonable grounds to suspect has occurred, or will occur; and
- Considers cannot reasonably be managed through our existing internal reporting procedures.

Examples of wrongdoing that may be reportable include, (but are not limited to):

- Dishonest and/or unethical conduct
- Fraud, forgery, misappropriation, misuse, misdirection, misapplication, maladministration, or waste of funds
- Gross mismanagement
- Grooming and/or child abuse that is not reported or not managed appropriately
- Conflicts of interest that are not declared or managed appropriately, nepotism, favouritism
- Theft, embezzlement, tax evasion
- Corruption, taking or offering bribes or secret commissions
- Dishonesty involving influence such as blackmail
- Coercion, harassment, or discrimination by, or affecting, any of our employees, volunteers or contractors
- Assault
- Abuse of public trust
- Misleading or deceptive conduct of any kind, including conduct or representations that amount to improper or misleading accounting or financial reporting practices by or affecting Housing Plus
- Other criminally prosecutable offences
- Failure to report, or concealment of, an indictable offence
- Conduct that poses an unreasonable danger to the health or safety of others
- Failure to act in accordance with applicable professional and ethical standards
- A significant threat to the environment
- A significant breach of the terms of any contract that binds Housing Plus
- Other serious acts such as refusing to carry out lawful and/or reasonable actions under a contract
- Other serious misconduct that may materially damage Housing Plus's reputation, or may otherwise be detrimental to Housing Plus
- Any other act that would otherwise be considered by a reasonable person to be serious improper conduct, or an improper state of affairs, or circumstances.

Wrongdoing also includes a deliberate attempt to conceal any of the actions described above.

Information to provide in a Whistleblower Disclosure

For a Whistleblower disclosure to be investigated it must contain enough information to form a reasonable basis for investigation. This may include any known details about the events underlying the actual or suspected wrongdoing including:

- A description of the events or activities, including locations.
- The names of the people involved and their roles.
- Relevant dates and times.
- Possible witnesses to the events.
- Supporting documentary evidence of the events.

In your disclosure, include any steps you may have already taken to report the matter elsewhere or to resolve the concern.

You can choose to make an anonymous disclosure. By providing non-identifying contact details, you will assist us to investigate your disclosure by enabling us to contact you if we need further information from you. You will also enable us to advise you of the outcome of the investigation.

If you provide your identity when you make your disclosure, this will help us to oversee your wellbeing.

How to make a Whistleblower Disclosure

If you wish to obtain additional information before making a formal Whistleblower disclosure, you may contact Your Call, the Whistleblower Officer, or an independent legal adviser.

You can choose to make an anonymous disclosure. By providing non-identifying contact details, you will assist us to investigate your disclosure by enabling us to contact you if we need further information from you. You will also enable us to advise you of the outcome of the investigation.

If you provide your identity when you make your disclosure, this will help us to oversee your wellbeing.

You can contact our Whistleblower Officer:

Name: Anthea Basha
Role: Governance Manager
Email: anthea@housingplus.com.au

Alternatively, to provide effective protection of Whistleblowers, including allowing continuous communication with anonymous Whistleblowers, Housing Plus has chosen to use the external and secure online service Your Call.

Your Call is an independent service provider with employees who are specifically trained to deal with the types of sensitive issues that are reported through Whistleblower policies.

A Whistleblower disclosure to Your Call may be provided anonymously or on the basis that the Whistleblower's identity is disclosed only to Your Call and kept confidential from Housing Plus.

You can raise your concerns or submit a Whistleblower disclosure directly to Your Call through any of the following methods:

Your Call telephone:	1300 798 101
Your Call 24/7 online:	www.whistleblowing.com.au (go to 'make a report' to access the report centre)
Housing Plus unique identifier:	HPWB2015 (used to identify the organisation, not the person making a report)
Your Call mailing address:	PO BOX 137, KEW VIC 3101

Your Call is our preferred mechanism for making a Whistleblower disclosure as it establishes anonymous (if required) and secure two-way communication between the Whistleblower and Housing Plus's Whistleblower Officer.

You may also provide a Whistleblower disclosure to:

- a Director or other Officer of Housing Plus, or
- Chief Executive Officer, Executive* or Senior Manager* of Housing Plus.
- an auditor, or member of an audit team conducting a financial audit of Housing Plus; this may be an internal or external auditor
- directly to ASIC (Australian Securities and Investment Commission) or APRA (Australian Prudential Regulatory Authority)
- a legal adviser in seeking advice relating to making a Whistleblower disclosure.

*Executive, Senior Managers are defined as a person other than a Director or Secretary of Housing Plus who participates in decisions that affect the whole, or a substantial part, of the organisation's business or has the capacity to affect significantly its financial standing.

The protections available to Whistleblowers under the Corporations Act only apply to "disclosable matters", which are:

- matters where the Whistleblower has reasonable grounds to suspect that the information disclosed relates to misconduct, which includes fraud, negligence, default, breach of trust and breach of duty, or
- an improper state of affairs or circumstances, in relation to Housing Plus or a related body corporate.

Whistleblowers should seek independent legal advice on the protections that may be afforded to them by the Corporations Act or under any relevant legislation.

A Whistleblower should not use the Whistleblower service to report a personal grievance or a complaint about a matter, not amounting to misconduct, that could be effectively managed through Housing Plus's existing internal reporting procedures.

Protections for Whistleblowers afforded by Housing Plus

Housing Plus will, as far as reasonably possible, provide to Whistleblowers the ability to make a report anonymously and will take all reasonable steps to reduce the risk that the Whistleblower will be identified as a result of the investigation of their disclosure.

One of the primary purposes of retaining the external independent whistleblowing hotline service provider, Your Call, is to allow Whistleblowers to only disclose their identity to Your Call and to keep their identity confidential from Housing Plus.

If a Whistleblower provides their identity or only non-identifying contact details to Your Call, this can assist in any subsequent investigation, and also allows Your Call to follow up to seek any clarification or provide feedback.

If a Whistleblower's identity is disclosed to a Whistleblower Officer and/or the Whistleblower investigator(s), they will keep the identity of the Whistleblower to themselves, where possible, and will at the first opportunity discuss with the Whistleblower the issue of confidentiality and the degree of risk that their identity may become known.

The Whistleblower's identity and information received from a Whistleblower will be held in the strictest confidence and will only be disclosed if:

- the Whistleblower has been consulted and consents in writing to the disclosure; or
- Your Call or Housing Plus is authorised by law or compelled by law to do so.

Your Call or the Whistleblower Officer (depending on who received the disclosure) will advise the Whistleblower if matters change in a way that affects Housing Plus's ability to protect the

Whistleblower's identity and will give the Whistleblower as much warning as reasonably possible if it appears likely that their identity will become known.

All files created with respect to a Whistleblower disclosure and investigation will be kept securely.

Receiving a Disclosure and Conducting an Investigation

When a disclosure of wrongdoing is received, Your Call or the Whistleblower Officer will assess the disclosure as a matter of priority, to determine whether it qualifies for protection under the Corporations Act and the nature and extent of the investigation that may be required including timeframes that will allow the investigation to be conducted both thoroughly and with expediency.

Whistleblower Investigator(s) are appointed by the Whistleblower Manager on a case-by-case basis depending on the particular circumstances of the Whistleblower disclosure and, in the interests of both perceived and actual objectivity, consideration will be given to employing external, independent investigators, particularly where the disclosure is serious.

The appointed Whistleblower Investigator(s) is responsible for conducting Investigations with respect to the Whistleblower disclosure with the aim of locating objective evidence relating to the claims made in the Whistleblower disclosure.

The Whistleblower Officer will act independently of the Whistleblower Investigator(s) and focus on the protection of the Whistleblower during the investigation.

The Whistleblower Investigator(s) will, as far as reasonably possible, follow best practice in investigations ensuring that:

- All reports of suspected wrongdoing that amount to disclosable matters are investigated in a way that adheres to the principles of objectivity, procedural fairness, confidentiality, and natural justice. This includes providing fair treatment to people who have been mentioned in a report of wrongdoing, by informing of the substance of statements that have been made about them and giving them a reasonable opportunity to respond.
- The system used to manage investigations is flexible. Communication is clear and unambiguous, and a multi-disciplinary approach is advisable where relevant to the issue in question.
- Any person who may be affected by the investigation is made aware of the allegations and evidence against them and is given the opportunity to respond. Their responses will be documented as part of the investigation's findings.
- Investigations are carried out as fast as reasonably practical and with a degree of confidentiality consistent with the seriousness of the allegations raised.

If the Whistleblower's identity is known or they can be contacted through anonymous channels, the Whistleblower Officer and/or Your Call will:

- Always seek to protect a Whistleblower from being compromised in the investigation and will seek to exclude the Whistleblower from the investigation at the Whistleblower's request, or if it is considered in the best interests of the Whistleblower.
- Provide feedback to the Whistleblower during the course of the investigation in a way that does not compromise the confidentiality of their identity. The frequency and timeframes for providing feedback will probably vary according to the nature of the disclosure and the investigations.
- Ensure that the Whistleblower will be informed of the outcome of an investigation where appropriate.

In particular:

- If the Whistleblower's concern was substantiated, the action that has been taken or will be taken to address the issues.
- If the Whistleblower's concern was not substantiated, that no further action will be taken unless further information becomes available.

There may be circumstances where it is not appropriate to provide details of the outcome to the Whistleblower and Housing Plus reserves its rights not to disclose details of the outcome where it is deemed inappropriate to do-so. The Whistleblower may ask for reasons to be provided following this decision.

Management of a person named in a disclosure

Housing Plus recognises that individuals against whom a Whistleblower disclosure is made must also be supported during the preliminary assessment of the Whistleblower disclosure and during any subsequent investigation.

It will be at the discretion of the Whistleblower Manager and the relevant Whistleblower Officer to determine if and when the person implicated in a disclosure that is not of a disclosable matter should be informed. This will often be determined by Housing Plus's existing internal reporting procedures and investigation processes. The decision will take into account the seriousness of the allegations, the desire to maintain the integrity of the person named, the maintenance of workplace harmony, and the need to protect the Whistleblower.

All reports of actual or suspected wrongdoing will be investigated in a way that adheres to the principles of objectivity, procedural fairness, confidentiality, and natural justice.

6 Document Control

Document history

Action	Responsible person	Date	Approved by (if req'd)
Created Draft	Anthea Basha	21 June 2021	CEO