

- 1. PURPOSE** The purpose of this policy is to encourage reporting of wrongdoing that is of legitimate concern by providing a convenient and safe reporting mechanism, and protection for people who make serious wrongdoing disclosures.
- 2. RESPONSIBILITY** All LEI employees, consultants and representatives of the company.
- 3. DEFINITION** A “whistleblower” or “whistle blower” is a person who informs on a person or organization regarded as engaging in an unlawful or immoral activity.
- 4. POLICY** LEI is committed to the highest standards of legal, ethical and moral behaviour. It requires that employees, consultants and other individuals associated with the Company who have reasonable grounds to suspect, or have actual knowledge of, misconduct report such information.

## REPORTING

Reports can be made to a superior, Team Leader, LEI Managing Director or can be lodged, anonymously if required, by accessing the LEI [Whistleblower Platform](#).

The platform asks for the kind of misconduct being reported, details of the persons involved, when the misconduct took place and a detailed description of the incident. All reports lodged through the platform will be reviewed and actioned by the Chair of the LEI Board, as an independent body external to LEI.

P-CO-9\_Complaints Management Procedure outlines the steps LEI will follow once a report is received.

## WHISTLEBLOWER PROTECTION

LEI will not tolerate retaliation against a whistleblower. Any attempt to deter a whistleblower from reporting misconduct is a serious offence and may be subject to disciplinary action including termination of any contractual relationship with the company.

## GOOD FAITH ALLEGATION

While actual knowledge or proof of misconduct is not required by this policy, the allegations of misconduct must be made by the whistleblower in good faith and have articulable grounds.

A whistleblower is required to provide a full statement of the facts of which s/he is aware and of any assumptions or circumstances s/he believes are relevant to the allegation. Once a whistleblower has made an allegation, the whistleblower is required to inform the Company of any relevant developments or changes in circumstance.

A whistleblower who makes a knowingly false, reckless or otherwise bad faith allegation of misconduct may be subject to disciplinary action, including the termination of any contractual relationship with the Company.

## ANONYMOUS ALLEGATIONS AND CONFIDENTIALITY

Whistleblowers are strongly encouraged to make their report with attribution (non-anonymously) to enable follow-up and detailed investigation.

All allegations of misconduct made by a whistleblower are treated as confidential to the maximum extent consistent with thorough investigation and as permitted by applicable law.

Every effort is made to protect the whistleblower’s identity. LEI follow legislative codes which creates an offence and imposes heavy penalties for disclosing the identity of a whistleblower without their consent other than in some exceptions as per the Corporations Act 2001 (Australia). LEI may take disciplinary action against

someone who fails to take reasonable steps or reasonable care to protect the identity of the whistleblower.

### DUTY TO COMPLY

It is the responsibility of every representative of the Company to fully comply with this Policy. Failure to comply may be subject to disciplinary action including contract termination, contract non-renewal or other appropriate action.

Australian whistleblower legislation amends articles in the Corporations Act 2001, through the enactment of the Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019.

### FORMS:

P-CO-9\_Complaints Management Procedure

### SIGN OFF:

MANAGING  
DIRECTOR:



Date: 03-04-25