

- 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 “whistle blower” or “whistleblower” 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 to their manager.

## REPORTING

Reports can be lodged by telephone or Skype, in person or in writing including by email or other electronic means. The report should include a description of the misconduct, date and time of the occurrence, details of the persons involved and name of the project and client (if applicable). P-CO-9\_Complaints Management Procedure outlines the steps to be followed once a report is received.

## WHISTLE BLOWER PROTECTION

LEI will not tolerate retaliation against a whistle blower. Any attempt to deter a whistle blower 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 whistle blower in good faith and have articulable grounds.

A whistle blower 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 whistle blower has made an allegation, the whistle blower is required to inform the Company of any relevant developments or changes in circumstance.

A whistle blower 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

Whistle blowers 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 whistle blower 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 whistle blower's identity. LEI follow legislative codes which creates an offence and imposes heavy penalties for disclosing the identity of a whistle blower 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 whistle blower.

## 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.

# P-CO-14 WHISTLE BLOWER POLICY

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Australian whistle blower 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:**

A handwritten signature in black ink, appearing to read "K. Riskey".

**Date:** 29-05-19