

# Governance & Management

## CGAM.PO.03 Whistleblower Policy

### Purpose

Settlement Services International Limited and its subsidiary entities (**SSi Group**) are committed to the highest standards of conduct and ethical behaviour in our business activities and to promoting and supporting a culture of honest and ethical behaviour, corporate compliance and good corporate governance. This policy aligns with SSI Group's values and aims to ensure SSI Group complies with its obligations in relation to whistleblowers as set out in the *Corporations Act 2001* (Cth).

SSi Group's whistleblower process is an important element in detecting corrupt, illegal or other undesirable conduct. SSI Group encourages the reporting of any instances of suspected unethical, illegal, fraudulent or wrongdoing involving SSI Group.

The purpose of this policy is to provide information in relation to:

- Circumstances where whistleblower protections apply
- Who can make a disclosure and be eligible for whistleblowing protections
- Types of disclosures that qualify for whistleblower protections
- Who can disclosures be made to
- How to make a disclosure
- Anonymous disclosures
- Legal protections available for Whistleblowers
- Support for Whistleblowers and protection from detriment
- Investigation of disclosures
- Fair treatment of individuals involved in disclosures
- Training
- Policy review.

The version of this policy made publicly available may exclude information that is not useful or relevant to external disclosers or that would not be suitable for external publication.

### Scope

This policy applies to all current and former Board Directors, staff, volunteers, contractors, consultants, suppliers, financial and tax auditors (both internal and external), actuaries, tax

agents and BAS agents, who are engaged by SSI Group in the course of its operations, and to relatives, dependents and spouses of the above. The roles and responsibilities of each person are set out in this Policy.

It is the responsibility of every person within this scope to ensure they comply with this Policy.

## Policy

SSI Group prides itself on having an organisational culture that supports and encourages people to raise concerns about wrongdoing.

SSI Group Board, Executive and Management are committed to:

- Maintaining a workplace free of misconduct and supportive of whistleblowing
- Ensuring disclosures are dealt with appropriately and in a timely manner
- Ensuring individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported.

Whistleblowers will be subject to certain legal protections and support from SSI Group in relation to their disclosure, provided that it meets the requirements set out in this policy and the relevant legislation.

Written disclosures will usually be acknowledged within two (2) business days of receipt and SSI Group will aim for any actions taken to be completed within 20 business days, depending on the nature of the disclosure or the complexity of the matter.

Disclosures can be anonymous and will still qualify for the legal protections, however, if the Whistleblower is unable to be contacted for further information, please note that it may limit SSI Group's ability to investigate the matter.

If the Whistleblower is unhappy with the outcome of an investigation or any actions taken arising from the disclosure, they have a right to have the matter reviewed externally.

## Circumstances where Whistleblower protections apply

To qualify for Whistleblower protection under the *Corporations Act*, each of the following three requirements must be met:

- a. the person who makes the disclosure is an Eligible Whistleblower (Refer to: Who can make a disclosure and be eligible for whistleblowing protection)
- b. the disclosure is of a type that qualifies for whistleblower protection (Refer to: Types of disclosures which qualify for whistleblower protection), and
- c. the disclosure is made to an Eligible Recipient or another person or entity to whom a disclosure can be made (Refer to: Who can a disclosure be made to).

In addition, whistleblower protections will also apply to disclosures made to a lawyer to seek advice about the whistleblower laws including whether or not a potential disclosure would satisfy the above criteria (but note such advice should not be sought from SSI Group's in-house legal team).

Making a disclosure does not protect the Whistleblower from any consequences that may flow from their own involvement in any wrongdoing. However, active cooperation in the investigation, an admission and remorse may be taken into account when considering disciplinary or other action within SSI Group's control.

Even though a Whistleblower may be implicated in the wrongdoing they will not be subjected to any actual or threatened retaliatory action or victimisation in reprisal for making a disclosure under this Policy.

## Who can make a disclosure and be eligible for whistleblowing protections (Who is an eligible whistleblower)?

Persons who are within the following categories (or formerly were in one of these categories), can make a disclosure about SSI Group and be eligible for whistleblower protections:

- Board Directors (of any of the related entities, regardless which entity they are making a disclosure about, provided they are an "associate" of that entity within the meaning of the Corporations Act)
- all staff members (including Executives and Managers), regardless of whether they are permanent, fixed-term or temporary, full-time or part-time
- volunteers, interns, secondees
- contractors (including staff of contractors)
- suppliers (including staff of suppliers)
- consultants
- relatives, dependents, spouses (including de facto partners), of any of the above. (Note that in this case the actual discloser will be protected, but not the person they are or were related to – that person would also need to make a disclosure to be entitled to the legal protections).

## Types of disclosures that qualify for whistleblower protection

A disclosure qualifies for protection under the Corporations Act if the Whistleblower has objectively reasonable grounds to suspect the information concerns misconduct or an improper state of affairs ("disclosable matters"), for example:

- fraud, negligence, default, breach of trust or breach of duty
- criminal conduct (including theft, drug sale/use, violence or threatened violence, and criminal damage against property)
- financial irregularities, including fraudulent financial reporting or accounting practices, money laundering or misappropriation of funds
- offering or accepting a bribe
- failure to comply with, or breach of, legal or regulatory requirements
- engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made, or be planning to make, a disclosure
- offences against or contraventions of the *Corporations Act* or the *ASIC Act 2001 (Cth)* (for example: dishonest use of director's position, insider trading, insolvent trading, etc), and offences against any other Commonwealth law that is punishable by imprisonment for a period of 12 months or more, and
- conduct that represents a danger to the public or the financial system (even if it does not involve a breach of a law).

Note that a Whistleblower can still qualify for protection even if their disclosure turns out to be incorrect. However, deliberate false reporting is serious, and disclosures should only be made if the concerns are reasonably believed and valid. A person making a disclosure cannot rely on this Policy or the legal protections for frivolous or vexatious purposes since there must always be objectively reasonable grounds to suspect wrongdoing for it to be reported under this Policy.

## Disclosures that do not qualify for Whistleblower protections

Making a disclosure that does not relate to conduct identified above means that the protections afforded by the Corporations Act will not apply. However, protections may be available under other laws for certain other disclosures (e.g. *Fair Work Act 2009 (Cth)* or work health and safety laws regarding unsafe work practices).

In particular, disclosures concerning personal work-related grievances do not qualify for protection under this Policy or the Corporations Act. A personal work-related grievance is where the information concerns a grievance about any matter in relation to the complainant's current or former employment, having (or tending to have) implications for the complainant personally, but do not have significant impacts for SSI Group and do not concern any other disclosable matters.

Examples of grievances that may be personal work-related grievances, and consequently do not qualify for protection under this Policy, are as follows:

- an interpersonal conflict between the complainant and another staff member
- a decision relating to the engagement, transfer or promotion of the complainant
- a decision relating to the terms and conditions of engagement of the complainant

- a decision to suspend or terminate the engagement of the complainant, or otherwise to discipline the complainant.

Sometimes disclosures concerning personal work-related grievances may still qualify for protection, if they also concern wrongdoing or an improper state of affairs, for example sexual harassment that involves criminal behaviour, if there is a cross-over with a disclosure that is also about a disclosable matter, if there is a suggestion of misconduct beyond the discloser's personal circumstances, or if it is about suffering detriment for making a whistleblower disclosure.

Personal work-related grievances that do not qualify for Whistleblower protections should be raised following SSI's Grievance Resolution Policy and Procedure.

## Who to make a disclosure to

SSI Group encourages internal disclosures in the first instance, so that SSI Group can identify and address wrongdoing as quickly as possible. It is SSI Group's preference that disclosures be made to the following Eligible Recipients:

- SSI Group Executive – Most disclosures, unless they concern another General or Executive Manager, CEO, or Board Director
- CEO – Any disclosure concerning a General or Executive Manager or Board Director
- Chair of the Board – Any disclosure concerning the CEO
- Alternatively, if the Whistleblower has a reasonable belief that an Eligible Recipient or the Protected Disclosure Coordinator are not sufficiently independent, a disclosure may be made to the CEO or the Chair of the Board.

The names of SSI's current Executive (including CEOs) and Board Directors are available on SSI's website at <https://www.ssi.org.au/about-us/leadership-team> and <https://www.ssi.org.au/about-us/board-members>.

Regardless of the above preference, Whistleblower protections will apply to qualifying disclosures made to:

- any Eligible Recipient (see [Definitions](#)): that is, Board Directors, CEO, Company Secretary, SSI Group Executive, financial and tax auditors (both internal and external) or actuaries, and, for disclosures relating to SSI Group's tax affairs can also be made to SSI Group's Head of Finance, the Commissioner of Taxation, or SSI Group's tax agents or BAS agents,
- ASIC, APRA, or another Commonwealth body that may be prescribed for this purpose. Refer to [Information Sheet 239](#) provided by ASIC on how you can make a disclosure outside SSI Group and qualify for protection. (<https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/how-asic-handles-whistleblower-reports/>), or
- a legal practitioner, for the purpose of obtaining legal advice about the disclosure (regardless of whether the disclosure ultimately satisfies the criteria), however note that this should be to an external lawyer (not one of SSI Group's Legal Team).

# Public Interest and Emergency Disclosures

In certain, limited circumstances, disclosures made to a journalist or parliamentarian can also qualify for protection. It is important to understand the criteria in which such disclosures can be made, and anyone seeking to make such a disclosure should first obtain external and independent legal advice to properly understand if their disclosure will qualify for protection.

As per the legislation, a Whistleblower can:

- Make a **Public Interest Disclosure (PID)** to a member of parliament or a journalist where at least 90 days have passed since making the disclosure to ASIC, APRA or other prescribed regulatory body, and the Whistleblower reasonably believes that:
  - Action has not been taken to address the matter, and
  - Further disclosure is in the public interest.
- Make an **Emergency Disclosure** to a member of parliament or a journalist where they have already made a disclosure to ASIC, APRA or other prescribed regulatory body, and the Whistleblower reasonably believes that there is substantial and imminent danger to the health and safety of one or more persons or to the natural environment. The Emergency Disclosure must not include any more information than is necessary to inform of the substantial and imminent danger.

In both cases, the Whistleblower must first give written notice to the body to whom they made the first disclosure (e.g. ASIC or APRA) of their intention to make a PID or emergency disclosure.

## How to make a disclosure

SSI Group recommends any person seeking to make a disclosure should first obtain external, independent legal advice to properly understand if their disclosure will qualify for protection.

Persons may make a disclosure to SSI Group in the following methods:

- in person to an Eligible Recipient
- in writing to an Eligible Recipient addressed to Level 1, 158 Liverpool Road Ashfield NSW 2131, and with the name of the chosen Eligible Recipient (please mark the envelope “Private and Confidential”, otherwise confidentiality cannot be guaranteed) N.B. If making a disclosure in writing, SSI Group recommends using the report form provided on SSI’s website and intranet
- by telephone to an Eligible Recipient.

SSI Group discourages disclosures being made by email, as other internal staff may have access to mailboxes (e.g. IT staff) and therefore confidentiality cannot be guaranteed.

When making a disclosure, the following information should be included:

- Whether the Whistleblower consents to their identity being disclosed to those investigating the matter

- If the Whistleblower is disclosing anonymously, how can SSI Group maintain contact with them in order to obtain further information and/or to provide them with updates.

SSI Group encourages making disclosures via the above methods, however if these are not considered appropriate, a report can be made to ASIC. More information on how to report to ASIC is available on ASIC's website, here: <https://asic.gov.au/about-asic/contact-us/how-to-complain/report-misconduct-to-asic/>.

## Anonymity

Reports of suspected wrongdoings may be submitted to SSI Group anonymously using the above methods, and still be protected under the whistleblower provisions in the Corporations Act. A Whistleblower can choose to remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised. A Whistleblower can also refuse to answer questions that they feel could reveal their identity at any time, including during follow-up conversations.

Anonymous disclosures may limit the protections and support that SSI Group is able to offer and it may also limit the ability to investigate the matter. Whistleblowers who wish to remain anonymous should maintain ongoing two-way communication with the entity, so the entity can ask follow-up questions or provide feedback. Pseudonyms may be used if the Whistleblower's identity is known to the Eligible Recipient, but they do not wish it to be further disclosed.

Where anonymity has been requested, the Whistleblower is also required to maintain confidentiality regarding the matter and to refrain from discussing the matter with any person.

## Legal protections available for whistleblowers

A Whistleblower who meets the requirements for legal whistleblower protection is entitled to protections under the Corporations Act including:

- Confidentiality: i.e. they are entitled not to have their identity revealed without their consent, and not to have information revealed that is likely to lead to their identification. [Note: These protections will not be contravened where SSI Group provides information to ASIC, APRA, a member of the Australian Federal Police, or a legal practitioner for the purpose of obtaining legal advice.]
- not suffer any detriment (real or threatened as detailed below) as a result of the disclosure (and protection from detrimental acts and omissions)
- not have their employment contract terminated on the basis of their disclosure
- compensation and other remedies for loss, damage or injury suffered because of a disclosure, or due to any failure by SSI Group to reasonably protect them from detriment. [Note: Independent, external legal advice should be sought prior to making such a claim], and

- civil, criminal and administrative liability protection for making the disclosure (e.g. breach of confidentiality obligations). [Note: The protections do not, however, grant immunity for any misconduct a Whistleblower has engaged in that is revealed in their disclosure].

These protections apply not only to internal disclosures, but also to disclosures made to legal practitioners, regulatory and other external bodies, as well as public interest and emergency disclosures that are made in accordance with the Corporations Act.

In particular, a Whistleblower must not be disadvantaged by any form of detriment or victimisation including reprisals such as dismissal, demotion, alteration of their position or duties, blocking of promotion, discrimination, harassment, intimidation, harm or injury (including psychological harm), damage to property, damage to reputation, damage to their business or financial position or any other damage.

The following are examples of actions that are not detrimental conduct:

- administrative action that is reasonable for the purpose of protecting a Whistleblower from detriment (e.g. moving a Whistleblower to another work area), and
- managing a Whistleblower's unsatisfactory work performance if the action is in line with the organisation's performance management framework.

SSI Group will ensure the Whistleblower understands the reasons for the administrative or management action.

Further considerations apply where serious breaches of the law are alleged. SSI Group may be legally obliged to report the breaches to the relevant authorities, such as the police, and may be obliged to cooperate with them. SSI Group's legal obligations may not permit them to shield the whistleblower, and the whistleblower will be informed accordingly.

The identity of the Whistleblower who makes a protected disclosure will not be disclosed unless:

- Consent to the disclosure is given
- The disclosure is to a legal practitioner for the purposes of obtaining legal advice, or
- Disclosure is to ASIC, APRA or a member of the Australian Federal Police.

Please note, if the disclosure does not meet the whistleblower protection requirements, other protections may be available under other laws. These include (but are not be limited to):

- *Fair Work Act 2009* (Cth)
- *Taxation Administration Act 1953* (Cth), for disclosures relating to SSI Group's tax affairs
- Public Interest Disclosure legislation for disclosures relating to services provided by SSI Group under government contracts (e.g. *Public Interest Disclosures Act 2013* (Cth) and *Public Interest Disclosures Act 1994* (NSW))
- Work Health and Safety (**WHS**) laws for disclosures relating to WHS issues or concerns (e.g. *Work Health and Safety Act 2011* (NSW)).



# Support for Whistleblowers and protection from detriment

The following measures and/or mechanisms are examples of ways SSI Group will protect the confidentiality of a Whistleblower's identity:

- Reducing the risk that the Whistleblower's identity will be revealed from the information contained in the disclosure (e.g. redacting personal information and references, referring to the disclosure in a gender-neutral context, etc.)
- Ensuring secure record keeping and information-sharing processes (e.g. limiting access to information to those directly managing and investigating the disclosure, storing all documents securely, reminding persons involved in the handling and investigating about the confidentiality requirements, etc.)

The following measures and/or mechanisms are examples of ways SSI Group will protect the Whistleblower from detrimental acts or omissions:

- Ensuring risk assessments are undertaken as soon as possible after a disclosure is received
- Taking actions to protect a Whistleblower from detriment, such as allowing them to work from another location
- Training Eligible Recipients on their obligations of confidentiality and protecting staff from detriment
- Providing referrals to support services (such as counselling or other professional or legal services)
- Putting in place strategies to help a Whistleblower minimise and manage stress, time or performance impacts or other challenges resulting from disclosure or its investigation.

## Investigation of disclosures

SSI Group values and will consider all reports and information that is received, but not every matter brought to the organisation's attention requires an action or investigation.

Written disclosures will usually be acknowledged within two (2) business days of receipt and SSI Group will aim for any actions taken to be completed within 20 business days, depending on the nature of the disclosure or the complexity of the matter.

The Protected Disclosure Coordinator will assess each disclosure (based on the information provided by the Eligible Recipient) to determine whether it qualifies for protection, will then determine the nature and scope of any investigation required, the persons within or outside the organisation that should lead the investigation (known as the Investigation Officer), the nature of any technical, financial or legal advice that may be required to support the investigation, and the timeframe for the investigation.

If the Investigation Officer is internal, they must be independent of line management in the area affected by the wrongdoing disclosure.

The investigation will be conducted in an objective and fair manner, and as is reasonable and appropriate having regard to the nature of the disclosure and the circumstances. Where a report is submitted anonymously, SSI Group will conduct the investigation and its enquiries based on the information provided. However, SSI Group acknowledges that anonymity may sometimes prevent the organisation taking the issue further if it is not able to obtain additional information from the source of the disclosure.

Where appropriate to do so, the Whistleblower will receive relevant and timely feedback on the progress of the investigation, which may vary on a case by case basis. At the conclusion of the investigation, the Whistleblower will typically be informed of the outcome, however there may be circumstances in which this is not appropriate.

Disclosures and investigation material will be stored on secure networks to prevent unauthorised access, separate to People & Culture (SSI Group's Human Resources department) files. Investigation materials and reports will not include the Whistleblower's identity unless they have consented to the disclosure of their identity or if one of the other exceptions applies.

If the Whistleblower is dissatisfied with the investigation process or the outcome of an investigation, and the CEO is unable to resolve the matter, the Whistleblower can contact the relevant external agency for a review, such as ASIC or APRA.

## Fair treatment of individuals involved in disclosures

SSI Group will take reasonable steps to protect people who are the subject of a disclosure, and other staff who may be requested to assist in an investigation, from any detriment or reprisal as a consequence of their involvement in that investigation.

Measures and/or mechanisms for ensuring fair treatment of individuals mentioned in a disclosure may include:

- Handling disclosures confidentially where practical and appropriate
- Assessing each disclosure and determining whether it requires further investigation
- Ensuring persons who are the subject of a disclosure be advised about the matter prior to any actions being taken
- Ensuring investigations are objective, fair and independent and guided by the principles of natural justice and procedure fairness
- Providing updates on the progress of an investigation
- Ensuring persons are able to access support services.

Any breach of the Whistleblower Policy by acts of intimidation, retaliation, etc. will be considered a breach of SSI's Code of Conduct and will be dealt with as outlined within that Policy.

Any vexatious or malicious allegations which are unsubstantiated will be viewed seriously and may be subject to disciplinary action that could include dismissal, termination of service or cessation of a service or client relationship.

## More information

For more information on this policy and making protected disclosures, please contact General Manager, Corporate Services.

## Availability of this Policy and training

This Policy is available on SSI Group’s internal intranet and website. Training is provided to all staff who are designated to receive a disclosure under this Policy (**Eligible Recipients**). This training includes ensuring Eligible Recipients are aware of their strict obligation not to reveal a Whistleblower’s identity in contravention of this Policy, and to ensure they are aware of their obligations in relation to no detriments or reprisals towards the Whistleblower. All other staff will receive training on this Policy via SSI Group’s online training portal.

## Policy review

This policy will be reviewed and amended periodically to ensure the policy remains relevant, effective and reflects any changes in legislation. Unless otherwise indicated, this policy is current and applicable beyond the next review date.

## Roles and responsibilities

Role	Responsibilities
Whistleblower	A Whistleblower is expected to provide information to assist any inquiry/investigation of the wrongdoing disclosed.
Eligible Recipient	<p>The Eligible Recipient, as defined in the Definitions, is the person who receives a Whistleblower disclosure of wrongdoing and who must:</p> <ul style="list-style-type: none"> <li>• Maintain confidentiality of the Whistleblower’s identity and the information that is likely to lead to the identification of a disclosure. The recipient of the disclosure cannot disclose the identity of the Whistleblower, even to other Eligible Recipients in the organisation or to those that will investigate, unless they have the consent of the Whistleblower, or if they disclose their identity to: <ul style="list-style-type: none"> <li>a. ASIC, APRA, or a member of the Australian Federal Police</li> <li>b. a legal practitioner (for the purposes of obtaining legal advice or legal representation about the whistleblower laws), or</li> <li>c. a person or body prescribed by regulations)</li> </ul> </li> <li>• Assist the Whistleblower to access any internal or external support mechanisms as required</li> </ul>

Role	Responsibilities
	<ul style="list-style-type: none"> <li>• Ensure the Whistleblower is kept informed of any actions arising from the disclosure (e.g. assessment, investigation etc.), subject to the considerations of privacy of those against whom the allegations are made</li> <li>• Notify the Protected Disclosures Coordinator of disclosure allegations.</li> </ul>
Protected Disclosure Coordinator	<p>At SSI Group, this refers to the CEO or Company Secretary. The role of the Protected Disclosure Coordinator is to receive particulars about all whistleblower events (though not the identity of the Whistleblower, unless they have consented) and is responsible for:</p> <ul style="list-style-type: none"> <li>• Maintaining confidentiality</li> <li>• Safeguarding the interests of the Whistleblower in accordance with this policy</li> <li>• Receiving and assessing the substance of reports on the basis of sufficient evidence in support of matters raised</li> <li>• Determining whether to refer reports for further action</li> <li>• Arranging for an inquiry/investigation into the disclosures made by the Whistleblower</li> <li>• Ensuring appropriate government agencies are notified about whistleblower events where required</li> <li>• Maintaining a Whistleblower Register for trend analysis and to identify systemic issues requiring attention</li> <li>• Overseeing resolution of the matter</li> <li>• Where appropriate, share the final investigation report from the Investigation Officer with the CEO, SSI Group Executive and/or the Board.</li> <li>• Be satisfied that each disclosure of wrongdoing they received was appropriately inquired into or investigated</li> <li>• Be satisfied that action taken in response to the inquiry/investigation is appropriate to the circumstances</li> <li>• Provide governance oversight over any inquiry/investigation into retaliatory action taken against the Whistleblower.</li> </ul>
Investigation Officer	<p>The Investigation Officer is independent of the Eligible Recipient and will:</p> <ul style="list-style-type: none"> <li>• Investigate the allegation</li> <li>• Where required ask the Eligible Recipient if the Whistleblower gives consent to share their identity with the Investigation Officer</li> <li>• Obtain any relevant written evidence</li> <li>• Contact and interview all the relevant parties</li> <li>• Maintain an audit trail and document the critical findings and decisions made during the course of the investigation</li> <li>• Record their findings</li> <li>• Prepare a report outlining their investigation, the conclusion they have reached and why they have reached this conclusion</li> </ul>

Role	Responsibilities
	<ul style="list-style-type: none"> <li>Provide the final investigation report to the Protected Disclosure Coordinator.</li> </ul>

## Definitions

Term	Definition
ASIC	Australian Securities and Investments Commission
APRA	Australian Prudential Regulation Authority
Corporations Act	<i>Corporations Act 2001</i> (Cth)
Detriment	As defined in section 1317ADA of the <i>Corporations Act</i> includes any of the following: <ol style="list-style-type: none"> <li>dismissal of an employee</li> <li>injury of an employee in his or her employment</li> <li>alteration of an employee's position or duties to his or her disadvantage</li> <li>discrimination between an employee and other employees of the same employer</li> <li>harassment or intimidation of a person</li> <li>harm or injury to a person, including psychological harm</li> <li>damage to a person's property</li> <li>damage to a person's reputation</li> <li>damage to a person's business or financial position</li> <li>any other damage to a person.</li> </ol>
Detrimental conduct	Conduct, or a threat to engage in conduct, that causes detriment to a Whistleblower.
Eligible Recipient	An Eligible Recipient is a person to whom a report of wrongdoing can be made in order to qualify for protection. At SSI Group this includes: <ul style="list-style-type: none"> <li>CEOs</li> <li>SSI Group Executive (as “senior managers”, within the meaning of the Corporations Act) (see website for list <a href="https://www.ssi.org.au/about-us/leadership-team">https://www.ssi.org.au/about-us/leadership-team</a>)</li> <li>Board Directors (see website for list <a href="https://www.ssi.org.au/about-us/board-members">https://www.ssi.org.au/about-us/board-members</a>) and the Company Secretary</li> <li>SSI Group’s internal and external financial auditors and actuaries, and</li> <li>For disclosures concerning tax affairs, SSI Group’s Head of Finance, tax agents and BAS agents.</li> </ul>

Term	Definition
Personal work-related grievance	A disclosure that relates to the complainant’s current or former employment, which has implications for the complainant personally but does not: <ul style="list-style-type: none"> <li>• Have any other significant implications for the organisation, or</li> <li>• Relate to conduct, or alleged conduct, about a disclosable matter.</li> </ul>
SSI Group	Settlement Services International Limited and its subsidiary entities: <ul style="list-style-type: none"> <li>• Access Community Enterprises Limited</li> <li>• Access Community Services Limited</li> <li>• Brisbane Multicultural Arts Centre Limited</li> <li>• Multicultural Centre for Mental Health &amp; Well Being Limited.</li> </ul>
SSI Group Executive	Members of SSI Group’s Executive team who have executive oversight of SSI Group.
Staff	Chief Executive Officer ( <b>CEO</b> ), SSI Group Executive, permanent and temporary staff, volunteers, interns, secondees, contractors, and consultants who are engaged by SSI Group in the course of its operations.
Whistleblower (or “Eligible Whistleblower”)	A person who has reasonable grounds to suspect wrongdoing, or an improper state of affairs or circumstances in the manner described in this Policy, and who is eligible for protection as a Whistleblower under this Policy or under the <i>Corporations Act 2001</i> (Cth) or other such legislation that may apply. Please see page 3 of this policy regarding the types of people who can be “Eligible Whistleblowers” about matters concerning SSI Group.
Whistleblowing	The reporting by an individual of wrongdoing within SSI Group’s ability to control, where the Whistleblower has reasonable grounds to suspect that the alleged wrongdoing occurred.

## Related documents

### Related Policies/Procedures

Document code	Document title
CGAM.FM.03.1	Whistleblower Report Form
CPAC.PO.01	Code of Conduct Policy
CPAC.PO.04	Conflict of Interest Policy
CRSK.PL.03	Fraud Control Plan
CQA.PO.10	Complaints and Feedback Policy
CQA.PR.10	Complaints and Feedback Procedure
CPAC.PO.05	Grievance Resolution Policy
CPAC.PR.05	Grievance Resolution Procedure

## External references

Description
<i>Fair Work Act 2009 (Cth)</i>
<i>Corporations Act 2001 (Cth)</i>
<i>Treasury Laws amendment (Enhancing Whistleblower Protections) Act 2019 (Cth)</i>
<i>Taxation Administration Act 1953 (Cth)</i>
<i>Public Interest Disclosures Act 2013 (Cth)</i> , and similar state-based legislation

## Version History

Version	Created	Author	Description
1	18 December 2019	GM Client Services & Operations	<ul style="list-style-type: none"> <li>Approved by Executive for publication</li> <li>Approved by the Board, November 2020</li> </ul>
1.1	13 November 2020	GM Client Services & Operations	Minor updates to reflect change in reference to SSI Group <ul style="list-style-type: none"> <li>Approved by the Board, December 2020</li> </ul>
1.2	1 March 2021	GM Client Services & Operations	Minor update clarifying that auditors refers to financial auditors
1.3	25 January 2022	Board Secretariat	QMS Review with minor updates including the removal of Greg Benson and reference to Board Members changed to 'Board Directors'. <ul style="list-style-type: none"> <li>Approved by the Board, December 2021</li> </ul>