

## Purpose and Commitment

Canberra Metro Operations (CMET) is committed to ethical, lawful, and responsible business conduct. CMET encourages all individuals to speak up if they identify or suspect misconduct, wrongdoing, or behaviour inconsistent with CMET's values or Code of Conduct.

CMET will ensure that:

- Whistleblowers feel safe to raise concerns
- Disclosures are handled confidentially and respectfully
- Whistleblowers are protected from retaliation or disadvantage
- Concerns are investigated fairly and independently
- CMET complies with the Corporations Act 2001 (Cth) and all applicable legislative requirements

No person will be disadvantaged or subjected to detriment for making a disclosure under this Policy.

## Objectives

The objectives of this Whistleblower Policy are to:

- Provide clear guidance on how to make a disclosure
- Ensure Whistleblowers understand their rights and protections
- Provide safe, confidential, and independent reporting pathways
- Establish procedures for assessing, investigating, and responding to disclosures
- Support CMET's broader risk, safety, and governance obligations

This Policy must be read in conjunction with CMET's Code of Conduct.

## Who is a Whistleblower?

This Policy applies to current and former:

- Directors
- Senior Leaders and Managers
- Employees
- Contractors, consultants, suppliers, and service providers (including their staff)
- Labour-hire personnel and secondees
- Volunteers
- A spouse, dependent, or relative of any of the above



## What can be reported

A disclosure may relate to any conduct that the Whistleblower reasonably believes:

- breaches CMET's Code of Conduct
- is fraudulent, corrupt, or illegal
- involves bribery, theft, or misuse of company funds
- constitutes serious misconduct under the Corporations Act
- endangers health, safety, or the environment
- breaches rail safety or regulatory obligations
- is unethical or improper
- indicates a systemic issue within CMET

Personal work-related grievances may not be covered unless they also involve:

- victimisation for raising a concern
- systemic misconduct
- unlawful conduct
- risks to health and safety
- reprisals for making a protected disclosure

## Eligible Recipients of Disclosures

Whistleblowers may make a disclosure to any **Eligible Recipient**, including:

### Internal Eligible Recipients

- **Head of Human Resources** (Business Conduct Representative)
- **Chief Executive Officer** (Workplace Protection Officer)
- Any authorised member of the CMET Senior Leadership Team

### External Eligible Recipients

- **Independent CMET Board Director** or shareholder HR (acting as Whistleblower Governance Delegate)
- External auditor or financial auditor engaged by CMET
- Regulators such as ASIC, APRA, ONRSR, or ACT WorkSafe
- A legal practitioner (for obtaining legal advice or legal representation)

### Public Interest and Emergency Disclosures

Disclosures to a journalist or parliamentarian are protected only under the specific circumstances outlined in the Corporations Act. Whistleblowers are encouraged to seek independent legal advice before using this pathway.



# Whistleblower Policy

## Making a disclosure

Disclosures may be made:

- verbally or in writing
- in person, email, letter, or telephone
- anonymously

Whistleblowers are encouraged (but not required) to provide sufficient detail to enable an effective assessment and investigation.

CMET will accept and act on anonymous disclosures to the fullest extent possible.

## Confidentiality and Anonymity

CMET will protect the identity of the Whistleblower unless:

- the Whistleblower consents
- disclosure is required by law
- disclosure is required to report to a regulator
- disclosure is necessary to progress an investigation

Information that may identify the Whistleblower will be handled with strict confidentiality and stored securely.

## Roles and Responsibilities

**Business Conduct Representative (BCR)**

The Head of Human Resources is the BCR.

Responsibilities include:

- receiving and initially assessing disclosures
- coordinating internal or external investigations
- keeping the Whistleblower informed as appropriate
- maintaining confidential records
- escalating matters to the Workplace Protection Officer
- identifying and managing any conflicts of interest

Where a disclosure involves the HR function or the BCR, the matter must be escalated to the WPO or Alternate WPO.

**Workplace Protection Officer (WPO)**

The Chief Executive Officer is the WPO.

Responsibilities include:

- protecting the Whistleblower from retaliation



- ensuring independence and procedural fairness in investigations
- authorising external investigators where required
- implementing corrective or protective actions
- escalating significant matters to the CMET Board

## 8.3 Alternate WPO – Independent Escalation Pathway

Where independence may be compromised such as disclosures involving the CEO, Head of HR, or a Senior Leader the matter must be escalated to an:

Independent CMET Whistleblower Governance Delegate (Independent CMET Board Director or shareholder HR)

This ensures:

- independence from CMET management
- rigorous and fair investigation oversight
- compliance with the Corporations Act
- protection of the Whistleblower from detriment

## Investigation Process

### Receipt and Assessment

- The BCR or Alternate WPO conducts an initial assessment to confirm whether the matter falls within this Policy.

### Appointment of Investigator

- An impartial internal or external investigator is appointed based on the nature and sensitivity of the disclosure.

### Investigation

- Investigations are conducted confidentially, with procedural fairness, and as promptly as circumstances permit.

### Findings

- Findings are documented, and corrective actions are recommended where appropriate.

### Outcome Communication

- The Whistleblower may be provided with outcome information, subject to confidentiality requirements.

## Protection from detriment

CMET will not tolerate retaliation against any Whistleblower. Retaliation includes:

- dismissal or demotion
- performance penalties
- alterations to duties disadvantaging the Whistleblower



# Whistleblower Policy

- bullying, harassment, or discrimination
- threats or intimidation
- any conduct that causes disadvantage or harm

Anyone found to have engaged in retaliation may face disciplinary action up to and including termination. Whistleblowers may seek compensation through the Corporations Act if retaliation occurs.

## Personal Work-Related Grievances

CMET may manage personal work-related grievances through standard HR processes unless:

- the matter also involves a broader wrongdoing
- the behaviour constitutes retaliation
- the matter relates to a systemic issue
- the matter has significant health, safety, or legal implications

## Accessibility

This Policy is available on:

- CMET SharePoint
- CMET External Website
- Onboarding materials
- Refresher training modules

## Review and Governance

This Policy will be reviewed:

- every two years, or
- earlier if required by legislative changes, audit findings, or organisational restructuring.

## Approval

Digitally Signed by:

**Chief Executive Officer**

Canberra Metro Operations Pty Ltd

Digitally Signed By:

CEO – Meghan Oldfield at: 17/12/2025 9:20:00 AM

Canberra Metro Operations Pty Ltd

