

Our Commitment

CMET is committed to upholding proper and ethical business practices. We want everyone to feel safe and empowered to speak up if they become aware of unethical or unlawful conduct in our business dealings. No person will be personally disadvantaged from reporting wrongdoing.

This policy sets out how CMET manages Whistleblower disclosures. It is to be read in conjunction with the Code of Conduct. The Policy is available to all employees via SharePoint.

Our Objectives

The objectives of this Policy are to provide clarity on how we support Whistleblowers so they:

- Know how to raise concerns and are aware of their rights and obligations, including the right to remain anonymous; and
- Feel safe in speaking up and raising concerns, free from detriment, retaliation, or victimization.

CMET is committed to complying with applicable laws for protection of Whistleblowers.

Who is a Whistleblower?

For the purpose of this Policy, a Whistleblower is a current or former:

- Director, Manager or Employee of CMET; or
- Contractor, consultant, supplier, service provider or associate of CMET (or their employees or subcontractors); or
- Any relative, dependent or spouse of any individual referred to above, who makes or attempts to make a disclosure, on reasonable grounds, about:
 - conduct that is contrary to the Code of Conduct;
 - an improper state of affairs; or
 - a breach of the legislation set out in the Corporations Act 2001 (Cth) ('Act').

Personal work-related grievances may not be protected pursuant to this Policy.

Making a Disclosure

The Policy applies where the Whistleblower makes the disclosure to an Eligible Recipient.

An Eligible Recipient includes:

- A person authorised by CMET to receive disclosures (HR Manager);
- An officer (who is a senior manager of CMET – SLT Member) of CMET.

A disclosure may also be protected under the Act:

- if it is made to certain regulators or legal practitioners in the circumstances stated in the Act; or
- if it is a 'public interest disclosure' or 'emergency disclosure' made to journalists or parliamentarians, in certain circumstances where previous disclosure has been made to prescribed government bodies and as stated in the Act.

Whistleblowers should contact an independent legal adviser before making a 'public interest disclosure' or an 'emergency disclosure'.

Confidentiality and Anonymity

The identity of the Whistleblower (or information disclosed that could lead to their identification), will be treated strictly confidentially, and will not be shared unless:

- The Whistleblower has provided prior consent (in writing wherever possible or required); or
- CMET is compelled by law to do so; or
- CMET considers it appropriate to make a disclosure to a regulator under legislation.

CMET will comply with all requests for anonymity (subject to legal requirements) and make best endeavours to investigate the disclosure. There may however be practical limitations if a Whistleblower does not agree to share their disclosure or identity:

Investigation

Whistleblower disclosures will be referred to the Business Conduct Representative in CMET (our HR Manager) to perform a preliminary review of the allegations raised and commission an appropriate investigation.

All investigations will be conducted in accordance with the procedures set out in the Whistleblower Procedures ensuring that the discloser will be kept informed, their details will be kept confidential, and investigations will be documented, and the outcome communicated to the discloser.

Workplace Protection Officer (WPO)

The Business Conduct Representative must inform the Workplace Protection Officer (WPO – who in CMET is the General Manager) of the matter. The WPO is responsible for safeguarding the interests of the Whistleblower by:

- Protecting the Whistleblower from retaliation.
- Maintaining the confidentiality of the Whistleblower; and
- Reviewing and considering any complaints of retaliation or any concerns that the disclosure has not been dealt with in accordance with the policy.

Whistleblowers who feel they have been disadvantaged as a result of reporting should approach the WPO or delegate within an Operating Company:

Operating Company	Name	Role	Email
WPO CMET	Bruno Lancelot	General Manager	bruno.lancelot@cmet.com.au

Key contacts can also be found on CMET's Intranet home page, under 'Code of Conduct'.

How are Whistleblowers protected?

Whistleblowers have statutory protections under the Act in addition to the protections provided by CMET under this Policy. Protections under the Act may include identity protection, protection from detrimental acts or omissions, compensation and remedies and liability protections.

CMET will ensure fair treatment of Whistleblowers and does not condone any form of reprisal (disciplinary or retaliatory) being taken against anyone for raising or helping to address a concern. CMET will take all reasonable steps to protect Whistleblowers from such retaliation.

Whistleblowers will not be personally disadvantaged as a result of reporting. Examples of disadvantage include dismissal, demotion, harassment, discrimination, interference with their role or bias.

Whistleblowers who feel they have been disadvantaged as result of reporting should approach the WPO.

Any person who participates in any reprisal against a Whistleblower will be subject to disciplinary action, which may result in termination of employment or reference to an external authority.

CMET retains the right to manage personal work-related grievances with a Whistleblower. These are matters that arise in the ordinary course of their employment or engagement (i.e., a separate or unrelated performance or misconduct issue).

Digitally Signed By:

[Last Signed Endorsed Name] at: [Last Signed Edorsed DateTime]

Canberra Metro Operations Pty Ltd