

# Whistleblower Policy

Issue Number 2

Release Date:

**26 September, 2023**

## 1. Purpose

- a. Inventis Ltd and each of its related entities (Inventis) is committed to ensuring a workplace with the highest standards of conduct and ethical behaviour.
- b. Whistleblowing refers to the act of raising concerns about potential, suspected, or actual misconduct within Inventis and is a key governance initiative to ensure transparency and accountability across Inventis.
- c. The purpose of Inventis' Whistleblower Policy (Policy) is to ensure that individuals are aware of how to make a disclosure that is eligible for the enforceable protections that are available under the Corporations Act 2001 (Cth) and the Taxation Administration Act 1953 (Cth) (Whistleblower Laws).
- d. This policy will be made available to officers and employees of Inventis and external stakeholders through our company website, [www.inventis.com.au](http://www.inventis.com.au).

## 2. Policy Application

- a. To be eligible for the protections under the Whistleblower Laws, there are certain conditions that must be met:
  - i. you must be an Eligible Whistleblower;
  - ii. you must make the disclosure to an Eligible Recipient; and
  - iii. the disclosure you make must be about Reportable Conduct.
- b. This Policy refers to meeting all of the above requirements as making a Protected Disclosure. If you make a Protected Disclosure you are entitled to enforceable protections. These enforceable protections are set out at Appendix A.
- c. If you are unsure if you meet the conditions to be eligible for the protections under the Whistleblower Laws, or have any questions regarding this Policy, please contact one of Inventis' Whistleblower Protection Officers (details in section 5)

## 3. Who Is An Eligible Whistleblower?

- a. To be protected under the Whistleblower Laws, a disclosure must be made by an 'Eligible Whistleblower.' An Eligible Whistleblower is any current or former:
  - i. Employee (including directors, managers and temporary staff);
  - ii. Officer;
  - iii. Contractor, supplier, consultant, service provider, business partner (including employees of suppliers); and
  - iv. Associate, as well as dependents (or their spouses dependent) and relatives of the above parties

## 4. Who Is An Eligible Recipient?

- a. An Eligible Whistleblower must make the disclosure to an 'Eligible Recipient'. An Eligible Recipient is any of the following:
  - i. Inventis' appointed Whistleblower Protection Officers (details below);
  - ii. An "officer" or "senior manager" as defined in the Corporations Act;

- iii. A director or company secretary of Inventis;
  - iv. An auditor or member of an audit team conducting an audit of Inventis; and
  - v. The Australian Securities and Investments Commission (ASIC) or the Australian Prudential Regulation Authority (APRA).
- b. If the Protected Disclosure relates to Inventis' tax affairs, the Eligible Whistleblower may also make a disclosure to the following Eligible Recipients (in addition to the persons listed above, other than ASIC and APRA):
- i. A registered tax agent;
  - ii. Any other Inventis employee who has functions in relation to Inventis' tax affairs, such as Inventis' Chief Financial Officer; and
  - iii. The Commissioner of Taxation.
- c. Disclosures to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions in the Corporations Act are also protected.

## 5. Whistleblower Protection Officers

- a. Inventis request that reports are made to any one of our Whistleblower Protection Officers:

**Michael Green**

Chief Operating Officer – Inventis Group

Phone: 02 8808 0469

Email: [MichaelG@inventis.com.au](mailto:MichaelG@inventis.com.au)

**Chantelle Knight**

Executive Assistant, HR Manager & Co-Company Secretary – Inventis Group

Phone: 02 8808 0477

Email: [ChantelleK@inventisgregory.com.au](mailto:ChantelleK@inventisgregory.com.au)

- b. Reports may also be mailed to:  
ATT: Inventis Whistleblower Protection Officers, Inventis Limited, Unit 4, 2 Southridge Street, Eastern Creek NSW 2766 or marked to any of the Inventis Whistleblower Protections Officers above.
- c. Confidentiality is maintained on any report received.

## 6. Anonymous Reports

- a. You may make an anonymous report or choose to disclose your identity, it is your choice. You do not need to disclose your identity to be eligible for protection under the Whistleblower Laws.
- b. If you provide your contact details to an Eligible Recipient these contact details will only be provided to the Whistleblower Protection Officer if you consent.

- c. In general, providing your name facilitates the process of addressing your disclosure. If you do not provide your name, the investigation will be conducted as best as possible with the information provided.

## 7. What is Reportable Conduct?

- a. You may make a report under this Policy if you have reasonable grounds to suspect that an Inventis director, officer, employee, contractor, supplier, tenderer or other person who has business dealings with Inventis has engaged in conduct (Reportable Conduct) which:
  - i. is dishonest, fraudulent or corrupt, including bribery;
  - ii. is an illegal activity (such as theft, violence, harassment or intimidation, criminal damage to property or other breaches of state or federal law);
  - iii. is unethical or in breach of Inventis policies (such as dishonestly altering company records or data, adopting questionable accounting practices or wilfully breaching the Inventis Code of Conduct and Ethics or other policies or procedures);
  - iv. is potentially damaging to Inventis, an Inventis employee or a third party, such as unsafe work practices, environmental damage, health risks or abuse of Inventis property or resources;
  - v. amounts to an abuse of authority;
  - vi. may cause financial loss to Inventis or damage its reputation or be otherwise detrimental to Inventis' interests;
  - vii. involves harassment, discrimination, victimisation or bullying, other than personal work-related grievances as defined in the Corporations Act; or
  - viii. involves any other kind of misconduct or an improper state of affairs or circumstances.
- b. Reportable Conduct generally does not include Personal work-related grievances, as described below.

## 8. What is a Personal Work-Related Grievance?

- a. Personal work-related grievances are not considered Reportable Conduct and should be raised directly with your Manager, or any other Inventis leader that you feel comfortable raising the matter with.
- b. Personal work-related grievances are issues in relation to your employment with Inventis that have implications for you personally (i.e. matters solely related to your personal employment). Examples of personal work-related grievances include, but are not limited to:
  - i. a conflict between you and another employee;
  - ii. a decision relating to your engagement, transfer or promotion;
  - iii. a decision relating to the terms and conditions of your engagement; and
  - iv. a decision to suspend or terminate your engagement or otherwise to discipline you.
- c. In some limited instances, a purely personal work-related grievance may be considered Reportable Conduct. This only occurs if

- i. You are threatened with or suffer from detriment because you have made a disclosure;
- ii. You seek legal advice or legal representation about the operation of the whistleblower protections under the Corporations Act;
- iii. Inventis has breached employment or other laws punishable by imprisonment for a period of 12 months or more, engaged in conduct that represents a danger to the public, or the disclosure relates to information that suggests misconduct beyond your personal circumstances.

### 9. Investigation of a Protected Disclosure

- a. Matters raised under this Policy will be received and treated seriously with a high level of sensitivity and confidentiality.
- b. Upon receipt of a Reportable Conduct claim, the Whistleblower Protection Officer or other Eligible Recipient will immediately escalate the matter to the Chair of the Audit and Risk Committee (Chair of ARC).
- c. The Chair of ARC will review all claims to assess whether the matter falls within the criteria for Reportable Conduct. Where it does, Inventis will investigate the matter reported under this policy as soon as practicable after the matter has been reported. The investigation will be conducted in an objective and fair manner and otherwise as is reasonable and appropriate having regard to the nature of the Reportable Conduct and the circumstances and as determined by the Chair of ARC. The Chair of ARC may, appoint a person to assist in the investigation of a report.
- d. While the particular investigation process and enquiries adopted will be determined by the nature and substance of the report, in general, as soon as practicable upon receipt of the report, if the report is not anonymous, the Chair of ARC or a Whistleblower Protection Officer (as directed by the Chair of ARC) will contact you to discuss the investigation process, including who may be contacted and such other matters as are relevant to the investigation.
- e. Where a report is submitted anonymously, Inventis will conduct the investigation and its enquiries based on the information provided to it.

### 10. Outcome of Investigations and Reporting Procedures

- a. Where an investigation identifies a breach of Inventis' Code of Conduct and Ethics or other internal policies or procedures, appropriate disciplinary action may be taken. This may include, but is not limited to, terminating or suspending the employment or engagement of the person(s) involved in the Reportable Conduct. If the report finds that there has been a suspected or an actual breach of the law, Inventis may refer the matter to the relevant legal authority.
- b. It is important for individuals to know that Eligible Whistleblowers can still receive protection under the Whistleblower Laws if their Protected Disclosure turns out to be incorrect.

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## 11. Reporting Procedures and Review of Policy

- a. The Whistleblower Protection Officers will be responsible for preparing periodic reports on the number and type of Protected Disclosures. These reports will also be presented at the Inventis Audit and Risk Committee at regular intervals to ensure the Company Directors have full visibility and transparency about Protected Disclosures. The Audit and Risk Committee will determine whether any matters need to be considered by the Company Directors.
- b. The relevant Whistleblower Protection Officer will provide the Company Directors with immediate visibility of any disclosure of a serious nature. The Whistleblower Protection Officer will also, at least annually, provide the Company Directors with a summary of disclosures made under this Policy and additional information about any material incidents raised.
- c. All reporting of matters investigated in accordance with this Policy will remain confidential. All steps will be taken to de-identify the discloser and any information that may lead to the disclosure of the identity of the discloser will be excluded from the report.

## 12. Relationship to Other Policies

- a. This Policy should be read in conjunction with the following Inventis policies:
  - i. Code of Conduct and Ethics
  - ii. Anti-Bribery and Anti-Corruption Policy
  - iii. Anti-Slavery Policy Statement

## 13. Policy Amendment

- a. This Policy cannot be amended without approval of the Inventis Board. It will be reviewed from time to time to ensure that it remains effective and meets best practice standards and the needs of Inventis.

## Approved by the Board

Date for next review of this policy: **September 2026**

## APPENDIX A

### Protections Provided by Law

#### 1. Special Protections and Remedies for Whistleblowers

- a. Inventis is committed to ensuring confidentiality in respect of all matters raised under this Policy and that those who make a report are treated fairly and respectfully and do not suffer detriment.

#### Protecting your identity

- b. Inventis' priority is to protect the identity of people who make a report. It is illegal for Inventis to disclose the identity of an individual who has made a Protected Disclosure. If you make a Protected Disclosure, your identity will only be disclosed if you give your consent to Inventis or if the disclosure is required by law.
- c. All files and records relating to a Protected Disclosure report or investigation will be stored and contained securely and confidentially.

#### Protection against detrimental conduct

- d. Inventis must not subject or threaten to subject an individual who has made a Protected Disclosure to detrimental treatment because they have made or may make a Protected Disclosure.
- e. Detrimental treatment includes dismissal, demotion, harassment, discrimination, disciplinary action, bias, threats or other unfavourable treatment.
- f. If you believe you are subjected to detrimental treatment because you made a Protected Disclosure, you should inform the Whistleblower Protection Officer listed in the Policy. If you consider the matter has not been appropriately addressed, you can refer it directly to the Human Resources Manager.

#### Other Protections

- g. An Eligible Whistleblower who makes a Protected Disclosure will be protected from any civil, criminal or administrative liability for making the disclosure. No contractual or other remedies can be enforced against the Eligible Whistleblower if the contractual or other remedy is exercised on the basis of them having made a Protected Disclosure.
- h. Individuals can seek compensation and other remedies through the Courts if they suffer loss or damage, or if Inventis fails to take reasonable precautions and exercise due diligence in protecting them from such loss.
- i. Eligible Whistleblowers should also know that in limited circumstances (e.g. if the disclosure has been made to a regulator) the information disclosed is not admissible in evidence against the Eligible Whistleblower in criminal proceedings or in proceedings for the imposition of a penalty, other than proceedings in respect of the falsity of the information.

## 2. Fair Treatment and Support

- a. Inventis is committed to ensuring fair treatment of all individuals involved in a Protected Disclosure, including both the Eligible Whistleblower and any persons named in a disclosure.
- b. To support individuals involved in the disclosure process, Inventis may offer:
  - i. the option of paid or unpaid leave;
  - ii. reassignment of duties;
  - iii. relocation; or
  - iv. support through an approved external employee assistance program where one is provided.

## 3. Other Protected Disclosures

- a. In certain circumstances, an Eligible Whistleblower can make a disclosure to a journalist or member of parliament and be protected under the Whistleblower Laws. The circumstances where such disclosures can be made include:
  - i. the discloser has reasonable grounds to believe that making a disclosure is in the public interest; and
    - the discloser has made a previous disclosure to ASIC or APRA (at least 90 days ago) and does not have reasonable grounds to believe that action is being taken; and
    - the discloser has given written notice to whomever the previous disclosure was made that states the discloser will make a further disclosure (**Public Interest Disclosure**).
  - ii. the discloser has reasonable grounds to believe that the information concerns a substantial and imminent danger to a person's health or safety or the natural environment; and
    - the discloser has made a previous disclosure to ASIC or APRA and does not have reasonable grounds to believe that action is being taken;
    - the discloser has given written notice to whomever the previous disclosure was made that states the discloser will make a further disclosure; and
    - the discloser only discloses information that is necessary to inform the recipient of the substantial and imminent danger (**Emergency Disclosure**).
- b. Please contact a Whistleblower Protection Officer if you would like more information about Public Interest Disclosures and Emergency Disclosures