

Whistleblower Policy

1. Purpose

Site Group International Limited (“Site”) is committed to the highest standards of conduct and ethical behaviour in all our business activities, and to supporting strong corporate governance, corporate compliance and transparency in decision making. At Site, our Code of Conduct recognises the importance of achieving a culture of openness, honesty, and accountability.

The purpose of this policy is to ensure that Site:

- Encourages and facilitates the disclosure of wrongdoing without fear of reprisal;
- Ensures that disclosures are dealt with appropriately;
- Provides appropriate protection and support for those who make disclosures;
- Promotes a culture of integrity and accountability; and
- Provides effective compliance with its legal and regulatory obligations.

2. Scope

This policy provides for processes regarding disclosure of wrongdoing. Site must comply with the obligations relating to the protection of Whistleblowers in the *Corporations Act 2001*.

This policy applies to Whistleblowers as outlined in *Sect 1317AAA of the Corporations Act 2001*. Whistleblowers can be employees of Site, whether full-time, part-time, or casual, at any level of seniority and wherever employed as well as contractors, suppliers, brokers, auditors or relatives, dependents, and spouses of these individuals. This policy also applies to all members of the Site community; students and volunteers are also encouraged to report any wrongdoing following this Policy.

Site operates in multiple countries and is subject to applicable local laws. If any local laws are in any way inconsistent with this policy, those local laws take precedence in that jurisdiction to the extent of the inconsistency.

3. Policy Requirements

3.1 Disclosable Matters

Disclosable Matters means any Conduct concerning Site that is:

- Dishonest;
- Fraudulent;
- Corrupt, including bribery;
- Illegal, such as theft, criminal damage to property or other breaches of state or federal law, also including harassment, intimidation, discrimination, victimisation or bullying;
- Unethical;

- In breaches of internal policy, such as dishonesty of altering company records or data, adapting questionable accounting practices or wilfully breaching Site's Code of Conduct, policies or procedures;
- Misconduct or an improper state of affairs in relation to a Site company;
- A danger or represents a danger to employees or to the public, such as unsafe work practices, environmental damage, health risk.
- Potentially cause financial loss to Site or damage its reputation or be otherwise detrimental to Site's interest.

Disclosable Matters do not include so-called 'personal work-related grievances' that have implications for that person personally, and that do not have broader implications for Site, for example, interpersonal conflict or disciplinary action. Disclosures that are not about Disclosable Matters, do not qualify for protection under the *Corporations Act 2001*.

3.2 Making a Disclosure

This policy applies when the disclosure of a Disclosable Matter is made:

- To an "Eligible Recipient";
- Via Site's intranet site;
- Via the dedicated reporting service line: # 0734620232

"Eligible Recipients" at Site Group are:

Vernon Wills - Managing Director & Chief Executive Officer

Craig Dawson - Chief Financial Officer

Peter Jones - Chairman & Non-executive Director

The Whistleblower may also contact an "officer" or a "senior manager" of the company. Under the *Corporations Act 2001* these are defined as "a director or a senior manager in the company who makes, or participates in making, decisions that affect the whole, or a substantial part of the business of the company, or who can affect significantly the company's financial standing."

Enquiry or obtaining additional information before making a disclosure is possible by contacting:

Craig Dawson – Chief Financial Officer, Contact Number: 0438 237 831.

In making a disclosure under this Policy, the Whistleblower must act in good faith on a genuine belief that there has been wrongdoing. Where it is determined that a disclosure is made falsely or with malicious purpose, Site Group Reserves the right to take disciplinary action.

Reporting to regulators

Nothing in this policy is intended to restrict anyone from reporting Disclosable Matters, providing information to, or communicating with a government agency, law enforcement body or a regulator in accordance with any relevant law, regulation or prudential standard applicable in a jurisdiction in which Site Group operates.

Site Whistleblower Policy

Related legislation: Legislation/Regulations
Corporations Act 2001 (Cth), Part 9.4AAA
To be read with: **Code of Conduct**

Issue Date:

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Author:

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Version 1.1

Page 2 of 6

How to make a disclosure

The disclosures of wrongdoing can be made:

- Orally or in writing;
- Anonymously or with disclosure of identity;
- On a confidential or non-confidential basis;

Anonymity

Disclosures can be made anonymously. Site Group will assess anonymous disclosures in the same way as if the Whistleblower reveals his identity. However, it is encouraged to share the identity when making a disclosure as it will make it easier to conduct the investigation.

Confidentiality

All information received will be treated confidentially and sensitively. The identity of the Whistleblower will only be shared if

- Consent is provided to share the information, or
- The disclosure is allowed or required by law (for example, disclosure to a legal practitioner to obtain legal advice or representation in relation to the operation of the Whistleblower regime are protected, even in the event if that the legal practitioner concludes, that a disclosure does not relate to a Disclosable Matter.)

In the case of information likely to identify the Whistleblower, if it is reasonably necessary to share the information for an investigation, all reasonable steps should be taken to protect the identity of the Whistleblower or reduce the risk of disclosing it. Further, the non-identifying content of disclosure may have to be shared to report it to Site's governance bodies, such as the Board of Directors.

3.3 Protection

Whistleblower Protection Officer

All qualifying Whistleblower Disclosures will be referred to a Whistleblower Protection Officer.

The role of the Whistleblower Protection Officer is to

- Monitor the implementation of this Policy and review on an ongoing basis its sustainability and effectiveness;
- Seek to protect the Whistleblower from Detrimental Conduct;
- Assist in maintaining the Whistleblower's wellbeing;
- Maintain the confidentiality of the Whistleblower, where relevant, including as required by the law;
- Review and consider any complaints of Detrimental Conduct or any concern that the disclosure has not been dealt with following this policy;
- Escalates any matter the Whistleblower Protection Officer considers appropriate to the Board of Directors.

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Page 3 of 6

Detrimental Conduct prohibited

The Group strictly prohibits all forms of Detrimental Conduct against the Whistleblower. Detrimental Conduct is referred to any actual or threatened conduct that could cause a detriment to the Whistleblower because of making a disclosure, including:

- Termination of employment;
- Harassment, bullying or intimidation;
- Disadvantage (personal or financial);
- Unlawful discrimination;
- Harm or injury, including psychological harm;
- Damage to reputation;
- any other conduct that constitutes retaliation.

Site prohibits all forms of Detrimental Conduct against people who are involved in an investigation of disclosure in response to their involvement in that investigation. Site will take all reasonable steps to protect the Whistleblower from Detrimental Conduct and will take appropriate action where such conduct is identified.

3.4 Investigation

The appointed Whistleblower Investigator will advise the Whistleblower whether to investigate unless he has no means to contact the Whistleblower. Investigations will follow a fair process and will be conducted promptly and independently of the person about whom the allegation has been made. Provided there are no restrictions or other reasonable bases for doing so, the person against whom an allegation has been made will be informed of the allegation and will have an opportunity to respond to the allegation.

Internal Investigation

Disclosures made under this Policy will be documented and investigated by an appointed internal investigator. The investigations must be carried out as quickly as possible.

The internal investigator is required to

- Act impartially and document the disclosure;
- Conduct all interviews;
- Report on the outcomes of the investigation and prepare recommendations.

While maintaining confidentiality, all serious disclosures and progress of any investigation will be drawn to the attention of the Chief Financial Officer. The Chief Financial Officer will instruct the Management/Board of Directors to take remedial action.

External Investigation

If an internal investigator determines that there is an activity or conduct within Site which is potentially illegal, the Chief Financial Officer may decide to engage an external investigator.

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Version 1.1

Page 4 of 6

In this case:

The Whistleblower will receive appropriate protection. Site will, to the extent it can do so and is legally permitted, keep in confidence the identity of the Whistleblower.

The matter may be reported to the relevant regulatory authority or police agency. The identity of the Whistleblower will only be disclosed to the regulatory authority or police agency on the basis that, where legally permitted the Whistleblower's identity will be kept confidential.

Disclosure of the identity of the Whistleblower to any other organisation or person will require the consent of the discloser.

Finding & Follow-Up

The investigation may conclude with a report from the investigator. The report will include findings on the allegations and a summary of the evidence on which the findings are based. The Whistleblower and the person against whom the allegation has been made may be informed, to the extent permitted under applicable laws, about the outcome of the investigation.

Site will act in the best interest of the Whistleblower to protect him from any victimisation, adverse reaction or intimidation, and commits to ensuring confidentiality, to the extent permitted by law, and fairness in all matters raised in this Policy.

3.5 Support

Current and former Employees may also request additional support from the Whistleblower Protection Officer if required.

Site may, at its discretion, grant immunity from internal disciplinary proceedings relating to matters that come to light because of wrongdoing disclosure.

3.6 Escalations

Escalations to the Whistleblower Protection Officer are possible in case of the following concerns:

- The Whistleblower is subjected to Detrimental Conduct;
- The Whistleblower has not been dealt with following this Policy.

The Whistleblower Protection Officer will consider the concerns and, if appropriate, may take appropriate actions. Although, the Whistleblower Protection Officer may not be able to act if the Whistleblower wishes to remain anonymous.

The Whistleblower may escalate his concern directly to the Chief Financial Officer if

- The Whistleblower Protection Officer has not adequately resolved a complaint regarding Detrimental Conduct;
- The policy has not been followed by the Group;
- The discloser is not satisfied with the findings of the investigation;
- The decision of the Whistleblower Investigation Officer was not to conduct an investigation.

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Page 5 of 6

3.7 Breach of policy

Consequences

Breach of this policy may be regarded as misconduct, which may lead to disciplinary action (including termination of employment or engagement). An individual may also be exposed to criminal or civil liability for a breach of relevant legislation.

Escalation

Any alleged breach of this policy will be taken seriously and, if appropriate, will be separately investigated.

3.8 Review of Policy

Review Cycle

This policy and the actions outlined above will be reviewed every two years.

POLICY APPROVAL



Craig Dawson
Chief Financial Officer
Site

Dated: 1 January 2020