



WE CARE. WE DELIVER.

Document Title	Whistleblower Management System
Document Owner/s	Norah St George
Prepared by	Renata Roberts
Reviewed by	The Board
Approved by	Brett Lewis
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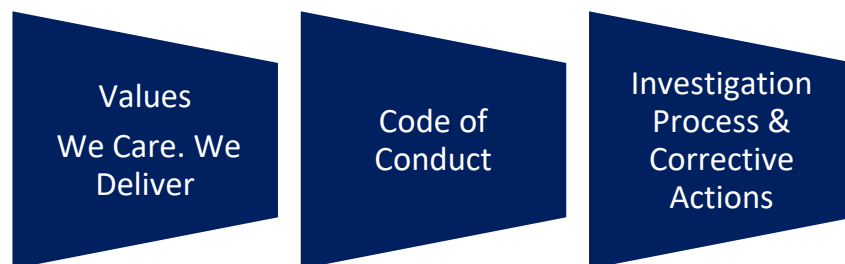
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The intent of this guide is to provide a summary of the delegated authorities and core activities in this document. It is not designed to be a replacement for the document it supports and should be read in conjunction with the document and any supporting resources.

1. System Overview



2. Critical Controls



3. Delegated Authority

Delegate	Activity	Further Details
Board	<ul style="list-style-type: none"> Oversee compliance with regulatory and Management System requirements Discuss and approve corrective actions Afford Eligible Whistleblowers fair treatment and protection Afford fair treatment for all employees involved in a disclosure 	Investigation of Disclosures Fair Treatment & Protection for Eligible Whistleblowers Fair Treatment for Employees
Internal Authorised Recipients	<ul style="list-style-type: none"> Report disclosures to the Board Complete an investigation in line with the process including conducting an initial review Take reasonable steps to protect anonymous reports Afford Eligible Whistleblowers fair treatment and protection Afford fair treatment for all employees involved in a disclosure 	Investigation of Disclosures Anonymous Reporting Fair Treatment & Protection for Eligible Whistleblowers Fair Treatment for Employees

External Authorised Recipients	<ul style="list-style-type: none"> ○ Report disclosures to the Board ○ Take reasonable steps to protect anonymous reports ○ Afford Eligible Whistleblowers fair treatment and protection ○ Afford fair treatment for all employees involved in a disclosure 	Investigation of Disclosures Anonymous Reporting Fair Treatment & Protection for Eligible Whistleblowers Fair Treatment for Employees
Eligible Recipients	<ul style="list-style-type: none"> ○ Report disclosures made to them to an 'Internal Authorised Recipient' ○ Take reasonable steps to protect anonymous reports ○ Afford Eligible Whistleblowers fair treatment and protection ○ Afford fair treatment for all employees involved in a disclosure 	Process for Making a Disclosure Anonymous Reporting Fair Treatment & Protection for Eligible Whistleblowers Fair Treatment for Employees
Eligible Whistleblowers	<ul style="list-style-type: none"> ○ Report disclosures in accordance with the process ○ Report disclosures in good faith with reasonable grounds ○ Participate in the investigation process as required (unless choosing to remain anonymous) 	Process for Making a Disclosure Reasonable Grounds Investigation of Disclosures

4. Definitions

Eligible Director: A Director who is not named in a Disclosure, or not responsible for, or involved in the day to day functions, control or management of the function of the Group relating to a Disclosure.

Non-Eligible Director: A Director who is named in a Disclosure or is otherwise responsible for, or involved in the day to day functions, control or management of the function of the Group relating to a Disclosure.

Eligible Board: the members of the Board excluding any Non-Eligible Directors.

Disclosure: A disclosure or a matter, made by an Eligible Whistleblower to an Eligible Recipient.

Non-Disclosable Matter: A disclosure made under this Management System that the Eligible Board determines does not qualify as a Disclosable Matter.

Eligible Whistleblower: A person is an Eligible Whistleblower under this Management System if they are or have been (for any entity within the Bloomfield Group):

- an Officer or employee; or
- a Supplier of goods or services, including the Suppliers employees; or
- a Relative or dependent of any of the above.

Eligible Recipient: A person is an Eligible Recipient if they are (for any entity within the Bloomfield Group):

- Director
- Officer
- Group Strategy Team ('GST') member
- other 'Internal Authorised Recipient' or 'External Authorised Recipient'

Internal Authorised Recipient: An Internal Authorised Recipient is an internal employee authorised by the Bloomfield Group to receive disclosures under this Management System and may conduct investigations as appropriate.

External Authorised Recipient: An External Authorised Recipient is an external person authorised by the Bloomfield Group to receive disclosures under this Management System and will report disclosures as required in accordance with relevant legislation and this Management System. The External Authorised Recipient will not conduct investigations unless otherwise agreed between the Board and the External Authorised Recipient.

Disclosable Matter: A matter is Disclosable if the 'Eligible Whistleblower' has reasonable grounds to suspect that the information concerns misconduct or an improper state of affairs or circumstances about the Bloomfield Group or one of its officers or employees and the disclosure is not about a personal work-related grievance, or a matter determined by the Eligible Board to be a Disclosable Matter.

Detriment: Detriment includes any of the following:

- dismissal of an employee;
- injury of an employee in his or her employment;
- alteration of an employee's position or duties to his or her disadvantage;
- discrimination between an employee and other employees;
- harassment or intimidation of a person;
- harm or injury to a person, including psychological harm
- damage to a person's property;
- damage to a person's reputation;
- damage to a person's business or financial position; or
- any other damage to a person.

5. References

[Internal Audit Management System](#)
[Document & Records Management System](#)
[Communication & Consultation Management System](#)
[Fair Work Act 2009](#)
[Fair Treatment and Dispute Management System](#)
[Performance Improvement Management System](#)
[Training & Competency Management System](#)
[Values We Care We Deliver](#)
[Code of Conduct](#)
[Surveillance and Monitoring Management System](#)
[Harassment, Bullying and Discrimination Complaint Resolution Guidelines](#)
[Corporations Act 2001](#)
[Taxation Administration Act 1953](#)
[Australian Securities and Investments Commission Regulatory Guide 270](#)

1. Introduction

The Bloomfield Group is committed to the highest standards of conduct and ethical behaviour in all of our business activities. Furthermore, it is committed to promoting and supporting a culture of honest and ethical behaviour, corporate compliance and good corporate governance in line with the Bloomfield Group corporate values **We Care. We Deliver** and the Code of Conduct.

The Bloomfield Group encourages the reporting of any instances of suspected unethical, illegal, fraudulent or undesirable conduct involving our businesses and provides protections and measures so that those persons who report a Disclosable Matter may do so confidentially and without fear of detrimental treatment.

A person is afforded the specific support and protection outlined in this Management System when a Disclosable Matter is reported in accordance with the Corporations Act 2001 or this Management System. If a disclosure is not in accordance with the provisions of the Corporations Act 2001 or this Management System, the support and protection outlined here may not be available.

2. Objective

The objectives of this Management System are to:

- assist in understanding the definition of whistleblowing;
- provide a process for the reporting and investigation of disclosures under this system; and
- outline the confidentiality and protection provisions of relevant legislation.

3. Scope

This System applies to an 'Eligible Whistleblower' making a disclosure to an 'Eligible Recipient' about a 'Disclosable Matter' as defined within this Management System.

Employee personal work-related grievances are excluded from this System and should be handled under the relevant management system including the *Fair Treatment and Dispute Resolution System*.

4. What is Whistleblowing?

Whistleblowing means disclosing information or making a complaint or reporting a matter where:

1. The person making the disclosure is an 'Eligible Whistleblower'; and
2. The person to whom the disclosure is made is an 'Eligible Recipient'; and
3. The information is about a 'Disclosable Matter'.

Personal work-related grievances are excluded from the definition of *Whistleblowing* and the protections afforded to Disclosable Matters under this Management System. Such matters should be handled under the relevant Policy/ Management System. Sections of this Management System will apply to Non Disclosable Matters that are disclosed in good faith under this Management System.

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5. What is a Disclosable Matter?

A 'Disclosable Matter' includes the disclosure of information where the discloser has reasonable grounds to suspect that the information concerns misconduct, or an improper state of affairs or circumstances about the Bloomfield Group or one of its officers or employees.

A 'Disclosable Matter' includes conduct that:

- is fraudulent or corrupt, including bribery or other activity;
- is illegal activity or criminal behaviour;
- involves gross mismanagement;
- involves failure to comply with a legal duty; or
- involves dishonest or unethical behaviour; or
- constitutes an offence against any law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more; or
- represents a danger to the public or the financial system.

6. Process for Making a Disclosure

'Eligible Whistleblowers' may make a disclosure under this Management System to an 'Eligible Recipient' about a 'Disclosable Matter' as defined within this Management System.

The process for making a disclosure internally is to contact one of the 'Internal Authorised Recipients' listed below.

Name	Position	Phone	Email
Renata Roberts	Chief Corporate Services Officer	0488 014 911	rroberts@bloomcoll.com.au
Norah St George	Chief Financial Officer/Director	0439 642 297	nstgeorge@bloomcoll.com.au
John Richards	Director/Chairman	0419 236 002	jrichards@bloomcoll.com.au
Brett Lewis	Chief Executive Officer/Director	0409 494 366	blewis@bloomcoll.com.au
Katie Brassil	Independent / Non-Executive Director	0419 356 690	kbrassil66@gmail.com
Tony Pearson	Independent / Non-Executive Director	0416 234 982	tpearson@bloomcoll.com.au

A disclosure may also be reported externally to the Bloomfield Group 'External Authorised Recipient'. The 'External Authorised Recipient' is required to comply with obligations under relevant legislation.

Mark O'Connor	Auditor	02 4928 8595	whistleblower@cutcher.com.au
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A disclosure may also be made to an 'Eligible Recipient'. Once made aware of a report, the 'Eligible Recipient' is to notify an 'Internal Authorised Recipient' (above) in a timely manner.

An 'Eligible Whistleblower' may also make a disclosure to the Australian Securities and Investments Commission (ASIC), Australian Prudential Regulation Authority (APRA), to a legal practitioner (for the purpose of obtaining legal advice or representation) or another Commonwealth authority prescribed for the purposes of the *Corporations Act 2001*.

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7. Public Interest and Emergency Disclosure

An 'Eligible Whistleblower' may make a public interest disclosure or emergency disclosure. Such disclosure will only qualify for protection under the *Corporations Act 2001* if the conditions outlined in the Act are followed.

7.1 Public Interest Disclosure

Conditions for making a public interest disclosure to qualify for protection:

- the 'Eligible Whistleblower' has previously made a disclosure to ASIC, APRA, or another Commonwealth authority prescribed for the purposes of the Corporations Act 2001; and
- at least 90 days have passed since the previous disclosure was made; and
- the 'Eligible Whistleblower' does not have reasonable grounds to believe that action is being, or has been, taken to address the matters to which the previous disclosure related; and
- the 'Eligible Whistleblower' has reasonable grounds to believe that making a further disclosure of the information would be in the public interest; and
- after the end of the 90 day period, the 'Eligible Whistleblower' gives the body to which the previous disclosure was made a written notification that:
 - includes sufficient information to identify the previous disclosure; and
 - states that the 'Eligible Whistleblower' intends to make a public interest disclosure; and
- the public interest disclosure is made to:
 - a member of the Parliament of the Commonwealth, the Parliament of the State or the legislature of a Territory; or
 - a journalist; and
- the extent of the information disclosed in the public interest disclosure is no greater than is necessary to inform the recipient of the misconduct or the improper state of affairs or circumstances previously disclosed.

7.2 Emergency Disclosure

Conditions for making an emergency disclosure to qualify for protection:

- the 'Eligible Whistleblower' has previously made a disclosure to ASIC, APRA, or another Commonwealth authority prescribed for the purposes of the Corporations Act 2001; and
- the 'Eligible Whistleblower' has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health and safety of one or more persons or to the natural environment; and
- the 'Eligible Whistleblower' gives the body to which the previous disclosure was made a written notification that:
 - includes sufficient information to identify the previous disclosure; and
 - states that the 'Eligible Whistleblower' intends to make an emergency disclosure; and
- the emergency disclosure is made to:
 - a member of the Parliament of the Commonwealth, the Parliament of the State or the legislature of a Territory; or
 - a journalist; and
- the extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the recipient of the substantial and imminent danger.

8. Anonymous Reporting

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A disclosure can be made anonymously. However, where a disclosure is made anonymously, it may be difficult or impossible for the Bloomfield Group to properly investigate the disclosure. Where a disclosure is submitted anonymously, the Bloomfield Group will conduct its enquiries based on the information provided and in line with this Management System.

9. Qualification of Disclosures

The Bloomfield Group will consider all disclosures made under this Management System and determine the appropriate course of action as soon as practicable after the matter has been reported.

The 'Internal Authorised Recipient' or 'External Authorised Recipient' will report all disclosures to an Eligible Director as soon as reasonably practicable.

Upon receipt of a disclosure, the Eligible Board will determine whether the disclosure qualifies as a Disclosable Matter in line with this Management System and/or whether there is a more appropriate Policy/Management System that should be used to address the disclosure, such as the *Harassment, Bullying and Discrimination Complaint Resolution Guidelines*. Should the Eligible Board determine the disclosure does not qualify as a Disclosable Matter, the 'Internal Authorised Recipient' or 'External Authorised Recipient' will be notified to work with the person who made the disclosure on an appropriate action to address their concern.

10. Investigation of Disclosures

Where the Eligible Board accepts that a disclosure is a Disclosable Matter it will then determine the appropriate process which may include the appointment of an internal or external investigator. The Eligible Board will oversee any investigation process and discuss and approve any corrective actions.

Where appropriate, the Bloomfield Group will provide feedback to the Eligible Whistleblower regarding the investigation's progress and/or outcome (subject to considerations of anonymity and the privacy of those against whom allegations are made).

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 disclosure and the circumstances.

The nature and substance of the disclosure will determine the appropriate process. In general, as soon as practicable upon receipt of the disclosure report, an Eligible Director or the Eligible Board will conduct an initial review of the report to determine whether or not the report falls under this Management System.

The initial review will be considered when determining the direction of the investigation process.

If the report is not anonymous, an 'Internal Authorised Recipient', 'External Authorised Recipient' or external investigator will contact the Eligible Whistleblower to discuss matters relevant to the investigation of the disclosure.

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The Eligible Board will endeavour to select an 'Internal Authorised Recipient' or external investigator with no actual, potential, or perceived conflict of interest to conduct any investigation. The 'External Authorised Recipient' will not conduct investigations unless otherwise agreed in writing between the 'External Authorised Recipient' and the Eligible Board. An 'Internal Authorised Recipient' or external investigator is required to notify an Eligible Director as soon as reasonably practicable after becoming aware of any actual, potential or perceived conflict of interest.

The Eligible Board will maintain confidentiality of all Disclosures, including their reporting, qualification, investigation, any corrective actions, and will not disclose any information relating to the Disclosure to Non-Eligible Directors, unless otherwise required by this Management System or the Corporations Act.

11. Reasonable Grounds

A person making a disclosure under this Management System must have reasonable grounds to suspect that the information concerns misconduct or an improper state of affairs or circumstances about the Bloomfield Group or one of its officers or employees and the disclosure is not about a personal work-related grievance.

A report may have serious consequences, including potential damage to the career prospects and reputation of people who are the subject of allegations of wrongdoing. Therefore, it is very important that those who make a report under this Management System do so in good faith, with reasonable grounds for believing that the information is correct or likely to be correct. It will be considered a very serious matter (including serious misconduct for a Bloomfield Group employee) should anyone make a dishonest report, exaggerate an issue or not have reasonable grounds to suspect that the subject matter of the disclosure is correct.

12. Fair Treatment & Protection for Eligible Whistleblowers (Disclosable Matters)

The Bloomfield Group is committed to fair treatment including that 'Eligible Whistleblowers' who make a report under this Management System are treated fairly and do not suffer 'Detriment'.

Disclosures made under this Management System by an 'Eligible Whistleblower' to an 'Eligible Recipient' about a 'Disclosable Matter' will be afforded the protections that are required under relevant legislation including the *Corporations Act 2001* and *Taxation Administration Act 1953* provided the conditions outlined in the legislation are met.

Whistleblowers are assured that a release of information in breach of this Management System will be regarded as a serious matter and will be dealt with under the *Performance Improvement Management System*.

A breach of the legislation may also result in civil, criminal and administrative liability being imposed on individuals or the Bloomfield Group.

For further information on the protections, you can contact an 'Internal Authorised Recipient' or refer to the relevant legislation as outlined above or seek independent legal advice. In certain circumstances an 'Eligible Whistleblower' (or any other employee or person) may be entitled to compensation and other remedies in accordance with the legislation.

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12.1 Protection against detrimental conduct or omissions

If you are subjected to 'Detriment' as a result of making a Disclosure (including one that does not qualify as Disclosable Matter) under this Management System, and so long as that Disclosure is made on reasonable grounds, in good faith and does not concern a personal grievance, you should inform an 'Internal Authorised Recipient', or member of the 'GST' for referral to an 'Internal Authorised Recipient' for investigation.

12.2 Protection of your identity and confidentiality

Disclosures made under this Management System will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Subject to compliance with legal requirements, upon receiving a report under this Management System, the Bloomfield Group will only share your identity as a Whistleblower or information likely to reveal your identity if:

- you consent;
- the concern is reported to the Australian Securities and Investments Commission ("ASIC"), the Australian Prudential Regulation Authority ("APRA"), the Tax Commissioner or the Australian Federal Police ("AFP"); or
- the concern is raised with a lawyer for the purpose of obtaining legal advice or representation.

If the Bloomfield Group needs to investigate a report, it may disclose information that could lead to your identification, but it will take reasonably practicable steps to reduce this risk.

12.3 Protection of files and records

All files and records created from an investigation will be retained securely. Unauthorised release of information to someone not involved in the investigation (other than senior managers or directors, or external advisors, who need to know to take appropriate action, or for corporate governance purposes) without your consent as a Whistleblower will be a breach of this Management System.

12.4 Protection against civil, criminal and administrative liability

Whistleblowers are protected against civil, criminal and administrative liability in accordance with relevant legislation. The protections do not grant immunity for any misconduct an 'Eligible Whistleblower' has engaged in that is revealed in their disclosure.

13. Fair Treatment & Protection for Non-Disclosable Matters

The Bloomfield Group is committed to fair treatment for all employees who make Disclosures under this Management System, including any Disclosures that are not qualified as Disclosable Matters.

A Non-Disclosable Matter made under this Management System by an 'Eligible Whistleblower' to an 'Eligible Recipient' will be afforded the protections (and will suffer no detriment) under the Code of Conduct, the Fair Treatment and Dispute Management System, the Harassment, Bullying, Discrimination and the *Fair Work Act 2009*.

Any investigation of Non-Disclosable Matter will be handled in accordance with the applicable Bloomfield Group Management System. Any information, records, documents or

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material obtained during the investigation will be maintained in accordance with the applicable Management System and the other requirements of this Management System. A release of information in breach of this Management System will be regarded as a serious matter and will be dealt with under the *Performance Improvement Management System*.

A breach of the legislation may also result in civil, criminal and administrative liability being imposed on individuals or the Bloomfield Group.

For further information on the protections afforded for Non Disclosable matters please refer to the relevant Management System or contact an 'Internal Authorised Recipient'.

14. Fair Treatment for Employees

The Bloomfield Group is committed to fair treatment of all employees involved in a disclosure in line with Bloomfield Policies and Management Systems and relevant legislation including but not limited to the Fair Work Act 2009.

15. Access to Management System

This Management System will be made available to officers and employees of the company via MOMS and it is available on the Bloomfield Group website to other persons wishing to access it.

16. Training

Training is conducted in accordance with the *Training & Competency Management System*. 'Internal Authorised Recipients' and 'External Authorised Recipients', the GST and the Board will receive specific training on their roles and responsibilities under this Management System.

17. Performance Measures

The Bloomfield Group is committed to the highest standards of conduct and ethical behaviour in all of our business activities. Furthermore, it is committed to promoting and supporting a culture of honest and ethical behaviour, corporate compliance and good corporate governance in line with the Bloomfield Group corporate values **We Care. We Deliver** and the Code of Conduct.

18. Evaluation and Ongoing Review

The ongoing effectiveness and efficiency of this Management System is monitored as part of the operation's day-to-day management. Feedback from this and other more formal reviews and/ or following special occurrences, form the basis for System improvement and re-design.

Internal auditing of this document is carried out as per the *Internal Audit Management System*. Ongoing review of this document is as per the *Document & Records Management System*.

19. Revision History

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4	Inclusion of new director as an Eligible Recipient, removal of COVID-19 statement as it is business as usual	29/04/2024	Erin Penglaze	Brett Lewis
3	Inclusion of new director as an Eligible Recipient	26/04/2022	Renata Roberts	Norah St George
2	Reviewed and Updated	10/01/2022	Norah St George	Brett Lewis
1	Additional Section on COVID-19	18/05/2020	Erin Penglaze	Renata Roberts
0	Original Issue	20/12/2019	Renata Roberts	Board
Rev.	Description	Date	Drawn	Approved