

# Whistleblower Policy



Maxima Cleaning Group

4 Barup Close, Middle Park QLD 4074

72603134103



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**Disclaimer:** This document contains material to assist in addressing Occupational Health and Safety management obligations. Although every effort has been made to ensure the accuracy of this information at the time of publication, it is provided as guidance only. It does not provide legal advice on meeting your obligations.

## Introduction



The Whistleblower Policy is a comprehensive set of tools that will help Maxima Cleaning Group manage our whistleblower program. The policy includes a:

- Whistleblower Policy.
- Whistleblower Reporting Procedure.
- Whistleblower Investigation Procedure.
- Whistleblower Policy Communication Plan.
- Fact Sheet-Understanding the Whistleblower Policy.
- Whistleblower Policy Risk Assessment.
- Whistleblower Case Management Record.

## Review Procedure

The Managing Directors will review the policy as required. The review schedule is directed in response to organisational and/or legislative changes and requirements. The review will be undertaken in consultation with workers, company representatives, and other relevant parties. All relevant persons will be made aware of changes made because of the review.

This policy will be reviewed if:

- there are changes in the workplace that may affect the policy;
- the policy is not effective;
- there are legislative changes that affect the policy;
- there is a breach of this policy.

This policy is reviewed at least annually.

## References

### Act, Regulations, Codes of Practice References:

- Work Health and Safety (Transitional and Consequential Provisions) Act 2011
- Work Health and Safety Act 2011
- Work Health and Safety Regulations 2011.
- Work Health and Safety (First Aid in the Workplace) Code of Practice 2015
- Work Health and Safety (Hazardous Manual Tasks) Code of Practice 2015
- Work Health and Safety (How to Manage Work Health and Safety Risks) Code of Practice 2015
- Work Health and Safety (Labelling of Workplace Hazardous Chemicals) Code of Practice 2015
- Work Health and Safety (Managing Electrical Risks in the Workplace) Code of Practice 2015
- Work Health and Safety (Managing Noise and Preventing Hearing Loss at Work) Code of Practice 2015
- Work Health and Safety (Managing Risks of Hazardous Chemicals in the Workplace) Code of Practice 2015
- Work Health and Safety (Managing the Risk of Falls at Workplaces) Code of Practice 2015
- Work Health and Safety (Managing the Work Environment and Facilities) Code of Practice 2015
- Work Health and Safety (Work Health and Safety Consultation, Co-operation, and Co-ordination) Code of Practice 2015

*Standards Australia 2001, – Occupational health and safety management systems - Specification with guidance for use, AS/NZS 4801: 2001 (Superseded by AS/NZS ISO 45001)*

*Standards Australia 2018, – Occupational health and safety management systems — Requirements with guidance for use, AS/NZS ISO 45001:2018*

## Standards and Guidelines

*Standards Australia 2016, – Quality management systems – Requirements, AS/NZS ISO 9001:2016*

## Terminology

### Abbreviations and Acronyms.

HR: Human Resources.

WPO: Whistleblower Protection Officer.

- ✦ *For this policy, no specific references will be made to the terms Health, Safety at Work (HSW), Work Health and Safety (WHS), we will refer to Occupational Health and Safety (OHS) as per the Australian Standard/New Zealand Standard (AS/NZS) International Organisation for Standardisation (ISO) 45001:2018.*

### Definitions.

We, us, our, our company or the organisation" means Maxima Cleaning Group.

Whistleblowing is when an individual raises concerns about wrongdoing, illegal, or unethical conduct within an organisation. Examples of potential whistleblowing issues at Maxima Cleaning Group might include fraudulent financial practices, violation of laws and regulations, unsafe working conditions, or other serious misconduct.

## Document Control

### Distribution Record Register

Copy	Issued to	Controlled Copy		Authorised by	Recipient Signature	Issue Date
		Y	N			
1		<input type="checkbox"/>	<input type="checkbox"/>			
2		<input type="checkbox"/>	<input type="checkbox"/>			
3		<input type="checkbox"/>	<input type="checkbox"/>			
4		<input type="checkbox"/>	<input type="checkbox"/>			
5		<input type="checkbox"/>	<input type="checkbox"/>			

### Amendment Record Register

Issue #: 1

Issue Date:

Rev. #	Date	Details		Description of Changes	Approved By
		Section #	Para. #		
1					
2					
3					
4					
5					

# Whistleblower Policy

This Whistleblower Policy outlines the company's commitment to promoting a transparent and honest culture. It encourages the reporting of misconduct and provides protection and support for individuals who come forward to report such conduct.

## 1. Purpose of this Policy

This policy aims to help identify wrongdoing that may adversely impact the company, workers, and stakeholders. The policy provides a mechanism for reporting serious misconduct, ensures individuals who disclose wrongdoing can do so safely, and provides a robust and fair process for investigation.

## 2. Scope of this Policy

This policy applies to all directors, officers, workers, contractors, suppliers, consultants, and associates of the company (collectively, "individuals").

## 3. Matters Covered by this Policy

This policy covers any disclosure by an Individual relating to dishonest, fraudulent, corrupt, illegal, unethical, or other inappropriate conduct (a "Reportable Matter").

## 4. Reporting a Reportable Matter

Individuals are encouraged to report any Reportable Matter they believe on reasonable grounds, has occurred or is occurring. Reports should be made to Maxima Cleaning Group's designated Whistleblower Protection Officer (WPO) officer or senior manager. Reports may be made anonymously.

*(Appendix A: Whistleblower Report Form)*

## 5. Investigations

Upon receipt of a disclosure, the WPO or officer will assess and determine an appropriate investigation process. The process will be objective, fair, and independent while ensuring the confidentiality of the discloser.

## 6. Protections for Disclosers

- a. Confidentiality: The Company is committed to maintaining the confidentiality of a discloser's identity and information that could likely lead to their identification.
- b. Protection from Detriment: The Company will protect disclosers from detrimental acts or omissions, including harassment, victimisation, discrimination, disciplinary action, or any other form of reprisal.
- c. Protection from Legal Liability: Disclosers will be protected from civil, criminal, or administrative legal action related to their disclosure.

## 7. Support and Practical Protections for Disclosers

The company will provide practical protections and support for disclosers, which may include managing and monitoring other workers' behaviour, relocating workers (voluntary), offering a leave of absence, or providing counselling and other support.

## 8. Fair Treatment of Workers Named in a Disclosure

Any worker who is implicated in a report will be treated fairly and will also have the opportunity to respond to any allegations made against them, subject to the requirements of a fair and thorough investigation.

## 9. Breaches of this Policy

Breaches of this Policy, including breaches of the confidentiality of a discloser's identity, will be taken seriously and may result in disciplinary action, including termination.

## 10. Access to this Policy and Training

This policy is available to all officers and workers and should be read in conjunction with the Company's Code of Conduct and related policies. Training will be provided to workers at all levels about their rights and obligations under this policy.



Signature:

Date: 01/04/2024

## RISK ASSESSMENT

We have established a comprehensive Whistleblower Policy as part of our commitment to maintaining an ethical and transparent workplace. A critical component of this policy is our Whistleblower Policy Risk Assessment.

This risk assessment is designed to identify, analyse, and address potential risks associated with our whistleblower program, ensuring we fully comply with all relevant laws and regulations. It also helps us ensure that our whistleblower program effectively encourages reporting, protects whistleblowers, and appropriately addresses reported misconduct.

This risk assessment is a living document, evolving to align with changes in our organisation's operational context, industry standards, and legal requirements. As such, we encourage all workers and stakeholders involved in the risk assessment process to consider our organisation's unique characteristics, including size, complexity, and the nature of our activities, when evaluating and managing risks.

It's important to remember that this risk assessment is not a one-time exercise. It should be reviewed and updated periodically to account for any changes in our operations or external environment or to adjust to newly recognised risks.

As workers or stakeholders conducting or participating in the risk assessment, your insights are invaluable. Your awareness of the daily operations, challenges, and potential areas of concern provides a unique perspective that can greatly contribute to the risk assessment process.

We encourage your active participation and open feedback, ensuring our risk assessment is both comprehensive and effective. Our goal is to create an environment where everyone feels safe to speak up about wrongdoing, and we see our Whistleblower Policy and Risk Assessment as crucial tools to achieve this goal.

*Appendix B: Whistleblower Policy Risk Assessment Table*

## Whistleblower Policy Communication Plan

**OBJECTIVE:** To ensure all stakeholders are aware of the Company's Whistleblower Policy, understand its purpose, and are clear about the process for making disclosures and the protections available to whistleblowers.

### INTERNAL COMMUNICATIONS

- Audience: All workers, contractors, and board members.
- Channels: Email, intranet, staff meetings, training sessions, posters in common areas.

Key Messages: Introduction to the policy, why it is important, the process for making disclosures, and the protections available to whistleblowers.

Schedule:

- Initial communication upon policy launch, followed by regular reminders (for example, quarterly).
- Training sessions to be conducted annually.

Responsible Parties:

- Human Resources (HR).
- Communications team.
- Managers.

### EXTERNAL COMMUNICATIONS

Audience: Customers, suppliers, shareholders, and other external stakeholders.

Channels:

- Company website.
- Annual report.
- Email to suppliers.
- Press release (if appropriate).

Key Messages: The company's commitment to ethical conduct and transparency, introduction to the policy, and information on how external stakeholders can make disclosures.

Schedule:

- Communication upon policy launch.
- Updates in the annual report.

Responsible Parties: Communications team, Senior Management, Shareholder Relations

### COMMUNICATION MONITORING AND EVALUATION

Objective: To assess the effectiveness of the communication plan and make necessary adjustments.

Metrics:

- Awareness of the policy (measured via surveys).
- The number of disclosures made feedback from workers and external stakeholders.
- Compliance with policy requirements.

Schedule: Ongoing monitoring, with formal evaluations conducted annually.

Responsible Parties: HR, Communications team, Senior Management.

## Whistleblower Reporting Procedure

This document provides guidelines for making anonymous reports via our system.

### 1. Making an Anonymous Report:

Workers, contractors, suppliers, or other stakeholders can report concerns about improper conduct within Maxima Cleaning Group. This may include but is not limited to, fraud, corruption, illegal activities, gross mismanagement, waste of resources, abuse of authority, and substantial risk to health and safety.

You can make a report by using our secure, anonymous reporting channels:

- Whistleblower Hotline: 1300 304 550
- Online Reporting Platform

Please provide as much information as possible about the suspected wrongdoing, including details of the incident, individuals involved, and any evidence, if available. The more detailed your report, the better we will be able to investigate your concerns.

### 2. Confidentiality and Anonymity:

We guarantee that your report will remain confidential and anonymous.

Only a select group of individuals within Maxima Cleaning Group who have been trained in whistleblower protection and case management will have access to your report. They are committed to maintaining your confidentiality to the greatest extent possible.

### 3. Handling of Reports:

After we receive your report, an initial review will be conducted to determine if a full investigation is necessary. If so, an investigator will be assigned to the case.

The investigator may communicate with you via our secure, anonymous online platform if additional information is needed or to provide updates on the case. Please note that specific details about the investigation or its outcomes may not be disclosed if it violates confidentiality rules or legal requirements.

### 4. Protections and Support for Whistleblowers:

Maxima Cleaning Group is committed to protecting whistleblowers from any retaliation or adverse consequences as a result of making a report. If you experience any form of retaliation, please report it immediately via the same anonymous reporting channels.

### 5. Review of the Anonymous Reporting System:

We will periodically review our anonymous reporting system and these guidelines to ensure their effectiveness and to make necessary improvements. Your feedback is invaluable to this process. If you have suggestions for improving our system, please share them via anonymous reporting channels.

Thank you for your commitment to upholding the values of Maxima Cleaning Group. Your courage and integrity make us a better organisation.

## Whistleblower Investigation Procedure

### 1. Receiving a Disclosure:

Once a disclosure is made, the designated Whistleblower Protection Officer (WPO) will document the disclosure in detail, including the report's date, time, manner, and content.

### 2. Assessing the Disclosure:



The WPO will initially review the information provided to determine whether it constitutes a Reportable Matter under the Company's Whistleblower Policy. Legal advice may be sought for complex matters.

### **3. Determining the Investigation Process:**

The WPO will decide on the appropriate investigation process. This might involve appointing an internal investigator, an investigation team, or engaging an external investigator, depending on the nature of the report.

### **4. Protecting the Whistleblower's Confidentiality:**

Throughout the investigation, the WPO and the investigator(s) will ensure the whistleblower's identity remains confidential unless the whistleblower consents to disclose it or if the disclosure is required by law.

### **5. Conducting the Investigation:**

The investigator(s) will gather all necessary evidence related to the report. This can involve reviewing relevant documents, emails, and other materials and conducting interviews with the whistleblower (if not anonymous), the person(s) implicated, and any potential witnesses.

### **6. Ensuring Procedural Fairness:**

The person(s) who are the subject of the whistleblower report should be informed about the allegations against them and be allowed to respond unless there are valid reasons for not doing so, such as the risk of evidence being destroyed.

### **7. Documenting the Investigation:**

The investigator(s) will document each step of the investigation process, including any findings, recommendations, and decisions made.

### **8. Reporting the Findings:**

A confidential report outlining the findings and recommendations will be prepared by the investigator(s) and provided to the WPO. The WPO will then report to the Board or appropriate governing body of the company.

### **9. Providing feedback to the whistleblower:**

Subject to privacy and confidentiality considerations, the whistleblower should be provided with feedback about the outcome of the investigation. If the whistleblower is not satisfied with the outcome, they should have a right to escalate the matter externally.

### **10. Implementing the Recommendations:**

Any recommendations made as a result of the investigation will be implemented promptly to prevent similar issues from arising in the future.

### **11. Reviewing the Whistleblower Program:**

The company will periodically review the effectiveness of its whistleblower program, including the investigation procedures, to ensure they are working as intended.

## Appendix A: Whistleblower Report Form

<b>1. Contact Information</b>	
Name:	Position:
Email:	Contact number:
<i>(Note: Providing your details is optional. You may choose to make this report anonymously.)</i>	
<b>2. Details of the Incident</b>	
Date & time of the incident:	Location of Incident:
<b>3. Individuals Involved</b>	
Individual's Name and Position (if known):	Role of the Individual in the Incident:
<b>4. Description of the Incident</b>	
Please provide a detailed account of the incident/concern. Include what happened, how it happened, and any other relevant details.	
<b>5. Evidence</b>	
Please provide details of any evidence that supports your disclosure. This may include documents, emails, names of witnesses, etc.	
<b>6. Other Relevant Information</b>	
Please provide any other information that you believe may assist in the investigation of this matter.	
<b>7. Declaration</b>	
I declare that all information provided in this report is true and correct to the best of my knowledge and belief.	
<ul style="list-style-type: none"> <li>• Signature:</li> <li>• Date:</li> </ul>	
<i>(Note: The declaration and signature are optional for anonymous disclosures.)</i>	

## Appendix B: Whistleblower Policy Risk Assessment Table

This template should be adapted to suit your organisation's specific needs and circumstances. Furthermore, legal advice should be sought to ensure that the risk assessment is comprehensive and compliant with all relevant laws and regulations.

Identified Risk	Analysis	Risk Controls/Mitigation
Non-compliance with legal and regulatory requirements.	Not complying with legal requirements can lead to penalties and harm to the organisation's reputation.	Regular review and update of the whistleblower policy by legal experts to ensure compliance.
Insufficient resources for the whistleblower program.	The program may not function effectively without adequate resources and might deter potential whistleblowers.	Allocate budget for the program during financial planning and ensure there are trained personnel to manage the program.
Ineffective communication of the whistleblower policy.	If stakeholders are unaware of or do not understand the policy, the number of reported instances may be low, and misconduct may go unnoticed.	Regular and comprehensive communication and training about the policy to all stakeholders.
Lack of clear process for making disclosures.	Potential whistleblowers may be deterred if the process is unclear or complicated.	Clearly outline the process in the policy and make it easily accessible.
Breach of confidentiality of the whistleblower.	Breach of confidentiality can lead to reprisals and deter potential whistleblowers.	Implement strict measures to ensure confidentiality, such as anonymised reporting and restricted access to disclosure information.
Inadequate protection against retaliation.	Fear of retaliation can deter potential whistleblowers from reporting misconduct.	Implement measures to protect whistleblowers, such as procedures to handle retaliation and providing support to whistleblowers.
Inadequate documentation and reporting of disclosures.	Poor documentation can hinder investigation and resolution of disclosures and may result in non-compliance with reporting requirements.	Implement procedures for thorough documentation and timely reporting of disclosures.
Poor handling of disclosures	Mismanagement of disclosures can deter whistleblowing and harm the organisation's reputation.	Train personnel in handling disclosures, and regularly review and improve procedures.

## Appendix C: Whistleblower Case Management Record

Case Reference Number	Date Reported	Reporter	Nature of Complaint	Assigned Investigator	Actions Taken	Outcomes	Follow-Up Actions Required	Status
001/2023 EXAMPLE ONLY	22/05/2023	John Doe (Worker)	Alleged financial irregularity in Department X	Jane Smith	Initial review of the complaint, interviewed reporter and Department X manager reviewed relevant financial records	Inconclusive - require further investigation	A detailed audit of Department X financial records	Ongoing
002/2023 EXAMPLE ONLY	25/05/2023	Anonymous	Alleged bullying behaviour by Team Y leader	Mark Brown	Initial review of the complaint interviewed Team Y members, reviewed HR records	Substantiated - bullying behaviour confirmed	Initiate disciplinary process against Team Y leader, provide support to affected team members, conduct workplace culture review	Completed