



WHISTLE BLOWER POLICY

1. INTENT

This policy establishes guidelines on reporting behaviour you may feel is wrong or does not match the values of Sydney Uni Sport & Fitness (**SUSF**). SUSF wishes to encourage people to speak up when they see activity or behaviour that they feel is wrong or does not match our values. The goal of this policy is to provide very clear guidelines on how we approach and manage this feedback. With our whistleblowing policy, we aim to ensure that:

- Every Worker has the chance to speak up anonymously when they feel SUSF is not adhering to our corporate values. They should have a place to report misconduct, know that every report will be heard and acted on, and feel confident that we will make improvements based on the results;
- Everyone is able to make reports anonymously. We commit to protecting informants' identities and they only need to reveal themselves if they choose to;
- SUSF will act on every report of misconduct, including through investigations where appropriate; and
- at the end of the investigation, we will document the results and provide feedback when appropriate.

2. SCOPE

This policy applies to all permanent full-time and part-time, maximum-term and casual employees, directors, officers, contractors, subcontractors, employees of contractors and subcontractors, consultants, volunteers, and work experience students who perform work for SUSF and any employees of labour hire companies who have been assigned to work for SUSF (**Workers**). It also applies to all SUSF members, customers (and their parents/guardians for customers under 18 years of age), service providers, suppliers, business partners and other external stakeholders .

3. POLICY

What Conduct should be reported?

We want to hear from you if you witness or know about any behaviour that is:

- Fraudulent;
- Illegal;
- Corrupt;
- Dishonest;
- Unethical;
- Violates the law or any legal code;
- Is creating an unsafe environment;
- Breaches any of our company's policies;
- Discrimination;
- Harassment and/or bullying of any kind; or
- Any conduct which is discriminatory or detrimental to SUSF and is likely to cause financial or non-financial loss to SUSF.

What Options do you have for making a report?



If a Worker or other person covered under the scope of this policy would like to make a report, they have different channels available where they can do this, including:

- Anonymous email to legal@sport.usyd.edu.au;
- Via post to SUSF Legal Counsel, SUSAC, Building G09, Sydney University NSW 2006;
- Speak confidentially with your Senior Manager if you are a Worker; and/or
- Speak with the owner of SUSF's whistleblowing program, SUSF Legal Counsel.

You Can Remain Anonymous

SUSF respects and protects your identity if you choose to make an anonymous report. You can choose to remain anonymous while making a report, interacting with case managers during an investigation of your report, as well as after your case is closed. At any given time, you can identify yourself, but this is your choice and at no point do you need to do this or will you be forced to provide your identity.

If you decide to disclose your identity, SUSF will work to protect your identity and will outline and document who in the organisation will know you submitted your report. SUSF will also take steps (as outlined in this policy) to ensure you do not suffer any retaliation.

It is worth noting that SUSF will make every endeavour possible to investigate your report, but in some cases, there are limitations of what can be achieved if the informant decides to remain anonymous.

The Investigative Process?

It is important for SUSF to be transparent with our workers and outline what is the process for us to investigate a report submitted through our whistleblowing channels. Below, we have provided the different steps of the process once a report is received until the case is closed.

1. Report (anonymous or otherwise) is received.
2. An investigator is assigned to the report, confirms its receipt and assesses it.
3. The investigator will do an initial assessment to confirm it is a valid report and, if there is a channel to do this, request the informant's cooperation with the investigation.
4. The investigator will begin their investigation. This can include corresponding with the informant if there is a channel to do this.
5. The investigator will investigate and update management (or the CEO or the Board depending on the nature of the complaint) and the informant per policy guidelines.
6. Once the investigator has finalised their investigation and report, management and the informant will be updated (although the informant will not receive a copy of the investigation report).
7. At this point, the investigator will hand everything over to management (or the CEO or the Board depending on the nature of the complaint) for any subsequent action to take place.

How SUSF Deals With Retaliation

SUSF does not tolerate any attempts to retaliate against an informant who has made a report. Any Worker or associated person who is found retaliating will face disciplinary action, including the potential to be terminated from their roles in accordance with the Workplace Conduct Policy (which prohibits victimisation).

Reporting to the Board of Directors



The Board of Directors is updated regularly on SUSF's whistleblowing program, inclusive of reports, investigations, and results. Reports or investigations carrying a high degree of risk will be reported to the Board of Directors outside of the regular updates. The Board of Directors at any time can ask about anonymous reports, investigations, as well as the state of SUSF's whistleblowing program.

4. RELATED POLICIES, PROCEDURES AND FORMS

- Workplace Conduct Policy
- Workplace Conduct Complaints Resolution Policy

5. ABOUT THIS POLICY

All individuals subject to this Policy are required to comply with its terms. However, to the extent this Policy describes benefits or entitlements provided by SUSF; these are discretionary in nature and are not intended to be contractual or binding on SUSF.

Subject	Whistleblower Policy
Authorised by	Chief Executive Officer
Contact	Legal Counsel
Version	1.1
Last review date	01 March 2022