



Collection House Limited

Whistleblower Protection Policy

**Revised Version 2:
Approved by the Board
on 26/06/08
Version 1: Approved by
the Board on 19/10/05**

Whistleblower Policy – Web Version

1 Policy Statement

Collection House Limited, its subsidiaries and related entities (“Collection House”) are committed to the aims and objectives of the Whistleblowers Protection Act 2001 and in particular, recognises the value in developing and fostering a culture of corporate compliance, ethical behaviour and good corporate governance.

Collection House also recognises the value of transparency and accountability in its administrative management practices and supports the making of disclosures that reveal improper conduct, fraudulent activity or mismanagement of Collection House’s resources.

This policy is applicable to all Collection House employees, Directors and Officers and related parties and encompasses all subsidiaries comprising Collection House.

This policy is to be read in conjunction with the Collection House Fraud and Corruption Policy.

1.1 Purpose

The purpose of this policy is to:

- (a) Create awareness of the Whistleblower Policy and Whistleblower Protection;
- (b) Help detect and address unacceptable behaviour or improper conduct;
- (c) Provide employees of Collection House with a supportive work environment in which they feel able to raise issues of legitimate concern to Collection House;
- (d) Provide employees with an avenue for reporting unacceptable or improper conduct;
- (e) Protect individuals who report unacceptable or improper conduct in good faith;
- (f) Improve the communication and transparency in the processes associated with whistleblowing and its consequences, namely reprisals and detrimental action; and
- (g) Enhance perception and the reality that Collection House is taking its governance obligations seriously.

1.2 Scope

- (a) This policy does not replace existing Company policies and procedures. This policy is to be followed only if an employee elects to make a disclosure of suspected or alleged corrupt or improper conduct and seeks protection under the Act.
- (b) Employees are reminded that the terms of their employment include an obligation to ensure that they act in accordance with the Collection House Philosophy, the Company’s Code of Conduct and the Company’s policies and procedures.

- (c) Collection House will not tolerate the following behaviour by employees:
- Conduct or practices which are illegal or breach any law, regulation or code of conduct applicable to Collection House;
 - Dishonest, Fraudulent, or Corrupt practices;
 - Misleading and/or deceptive conduct of any kind including, but not limited to, conduct or representations which amount to improper or misleading accounting or financial reporting practices either by or affecting Collection House;
 - Situations within the Company's control, or outside the Company's control, which pose a danger to the health and safety of any person;
 - Situations that are a significant danger to public health and safety or to the environment;
 - Situations that may cause financial loss to clients and/or Collection House or damage to their respective brand name(s) or reputation(s) or be otherwise detrimental to clients' and/or Collection House's interests; and
 - Acts that involve any other kind of serious impropriety.
- (d) Collection House will take all reasonable steps, and do all things necessary, to protect those who make protected disclosures from any detrimental action in reprisal for the making of the disclosure. Collection House will also deal fairly with employee(s) who are the subject of the disclosure.
- (e) Collection House is committed to implementing 'best practice' policies and procedures for dealing with allegations of suspected improper activity and the management (and protection) of the individual(s) making the allegation, and this policy is therefore subject to review and change from time to time, at the discretion of the Collection House Board.

1.3 **Flowchart**

Attached is a Whistleblower Policy and Procedure Flowchart briefly describing the process for dealing with a Protected Disclosure of any improper conduct or corruption within the organisation.

1.4 **Good Faith**

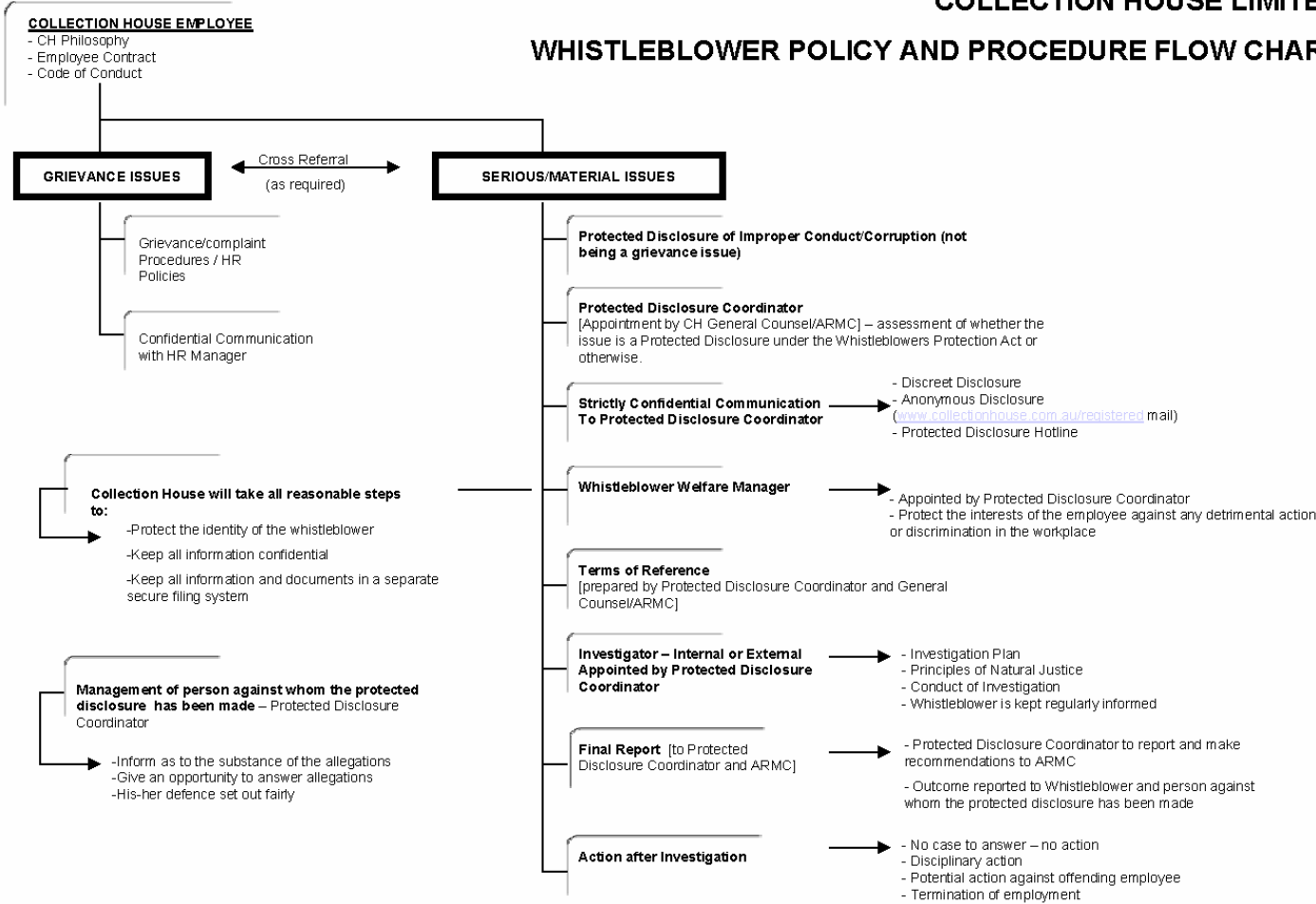
If an employee raises a genuine concern under this policy, he or she will not be at risk of losing their job, nor will they suffer any form of detrimental action as a result. As long as the employee is acting in good faith and in accordance with this policy, it does not matter if they are mistaken.

1.5 **How the Whistleblowing Policy Differs From the Grievance Procedure**

This policy does not apply to raising grievances about an employee's personal situation. These types of concern are covered by Collection House's grievance procedure. The whistleblowing policy is primarily concerned with where the interests

of others or of this organisation itself are at risk. It may be difficult to decide whether a particular concern should be raised under the whistleblowing policy or under the grievance procedure or under both. If an employee has any doubt as to the correct route to follow, this organisation encourages the concern to be raised under this policy and the Protected Disclosure Coordinator will decide how the concern should be dealt with.

WHISTLEBLOWER POLICY AND PROCEDURE FLOW CHART



The Whistleblower Protection Policy and Procedure will be reviewed annually to ensure compliance with the objectives of the relevant legislation and remain effective for Collection House. The Whistleblower Protection Policy and/or Procedure may be changed at anytime, at the discretion of the Collection House Board. ©Collection House Limited_Commercial-in-Confidence

2 Definitions

2.1 Whistleblowing

For the purpose of this policy, **whistleblowing is defined as:**

“the deliberate, voluntary disclosure of individual or organisational malpractice by a person who has or had privileged access to data, events or information about an actual suspected or anticipated wrongdoing within or by an organisation that is within its ability to control.”

The term whistleblowing encompasses any disclosure or attempted disclosure of improper conduct by any employee, director or related officer of Collection House regarding any other employee, director or related officer within the organisation.

2.2 Whistleblower

For the purpose of this policy, a **whistleblower** is defined as:

“any employee, director or related officer of Collection House, who makes or attempts to make a disclosure.”

2.3 Improper Conduct

For the purpose of this policy, **improper conduct** is defined as:

- (a) corrupt conduct;
- (b) fraudulent activity;
- (c) a substantial mismanagement of Collection House resources;
- (d) conduct involving substantial risk to public health or safety; or
- (e) conduct involving substantial risk to the environment,

that would, if proven, constitute:

- (f) a criminal offence;
- (g) reasonable grounds for dismissing or dispensing with, or otherwise terminating the services of a Collection House employee who was, or is, engaged in that conduct; or
- (h) reasonable grounds for disciplinary action.

2.4 Fraud

For the purpose of this policy, **fraud** is defined as:

“the unlawful and intentional making of a misrepresentation or inducement of a course of action by deceit or other dishonest conduct, involving acts or omissions or the making of false statements, orally or in writing, with the object of obtaining money or other benefits from or evading a liability to Collection House.”

Dishonest or fraudulent activities include, but are not limited to, the following:

- Forgery or alteration of documents (cheques, promissory notes, time sheets, agreements, purchase orders, budgets, etc.).
- Misrepresentation of information on documents.
- Misappropriations of funds, securities, supplies or any other asset.
- Theft, disappearance, or destruction of any asset.
- Improprieties in the handling or reporting of money transactions.
- Authorising or receiving payments for goods not received or services not performed.
- Authorising or receiving payment for hours not worked.
- Any violation of Federal, State, or local laws related to dishonest activities or fraud.
- Any similar or related activity.

2.5 Corruption

For the purpose of this policy, **corruption** is defined as:

“the intentional promise, offer, or gift by any person, directly or indirectly, of an advantage of any kind whatsoever to a person, as undue consideration for themselves, or for anyone else, to act or refrain from acting in the exercise of their functions, or the intentional request or receipt by a person, directly or indirectly, of an undue advantage of any kind whatsoever, for themselves or for anyone else, or the acceptance of offers or promises of such advantages to act or refrain from acting in the exercise of their functions.”

All acts are to be regarded as corruption which involve a person in a position to make decisions using his/her power in that field not in the interest of the organisation he/she represents but to promote his/her personal goals.

2.6 Protected Disclosure

For the purpose of this policy, **protected disclosure** is defined as:

“any good faith communication that discloses or demonstrates an intention to disclose information that may evidence (1) an improper activity or (2) any condition that may significantly threaten the health or safety of employees or the public if the disclosure or intention to disclose was made for the purpose of remedying that condition.”

2.7 Detrimental Action

For the purpose of this policy, **detrimental action** is defined as:

- (a) action causing injury, loss or damage;
- (b) intimidation or harassment; and

- (c) discrimination, disadvantage or adverse treatment in relation to a person's employment, career, profession, trade or business, including the taking of disciplinary action.

2.8 **Employee**

For the purpose of this policy, **employee** is defined as:

“any staff member who receives compensation, either full or part time, from Collection House or any of its subsidiaries or related entities.”

3 **Protected Disclosure**

3.1 **All Collection House Employees**

All Collection House employees are encouraged, and have the responsibility to, report any known or suspected incidences of improper activity or detrimental action in accordance with this policy.

All employees of Collection House also have an important responsibility concerning the welfare of the whistleblower within the organisation. All employees must refrain from any activity that is, or could be perceived to be, victimisation or harassment of a person who makes a disclosure. All employees must not, under any circumstance, engage in any activity that would constitute detrimental action (as defined by this policy).

3.2 **Whistleblower Protection Procedures**

Collection House has developed Whistleblower Protection Procedures for employees wishing to make a protected disclosure under this policy, which is located on the Collection House intranet.

4 **Confidentiality**

Collection House and its employees must take all reasonable steps to protect the identity of the whistleblower.

Maintaining confidentiality of a person known or suspected of having made a disclosure is crucial in ensuring reprisals are not made against a whistleblower.

5 **Managing the Welfare of the Whistleblower**

5.1 **Commitment to protecting whistleblowers**

Collection House is committed to the protection of genuine whistleblowers against action taken in reprisal for the making of protected disclosures.

5.2 **Keeping the whistleblower informed**

The Whistleblower Protection Procedures will ensure the whistleblower is kept informed of action taken in relation to his or her disclosure.

5.3 **Whistleblowers implicated in improper conduct**

Collection House acknowledges that the act of whistle blowing should not shield whistleblowers from the reasonable consequences flowing from any involvement in improper conduct. A person's liability for his or her own conduct is not affected by the

person's disclosure of that conduct. However, in some circumstances, an admission may be a mitigating factor when considering disciplinary or other action.

6 Review of Policy and Procedure

This policy and the Whistleblower Protection Procedures will be reviewed annually to ensure they comply with and meet the objectives of the relevant legislation and remain effective for Collection House. This policy and the Whistleblower Protection Procedures may be changed at any time, at the discretion of the Collection House Board.