



Collection House Group

# Whistleblower Policy

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### DOCUMENT CONTROL

#### ENDORSEMENT

Doc #	Current version	Approval date	Approved by	Review period	Author	Class
CHG 010	6	12/2020	CLH Board	Annual	Corporate Counsel	4

#### VERSION CONTROL

Doc #	Version	Revision date	Author/Modifier
CHG 010	6	12/2019	CFO & Company Secretary
CHG 010	5	6/2018	CFO & Company Secretary
CHG 010	4	6/2017	CFO & Company Secretary
CHG 010	3	6/2016	Corporate Counsel

# WHISTLEBLOWER POLICY

## 1 PURPOSE

- 1.1 Collection House Limited, its subsidiaries and related entities (Collection House) have a strong commitment and reputation for ethical and compliant business practices. Collection House recognises the value in developing and fostering a culture of corporate compliance, ethical behaviour and good corporate governance.
- 1.2 Collection House also recognises the value of transparency and accountability in its practices and supports disclosures that reveal improper conduct, fraudulent activity or mismanagement of Collection House's resources.
- 1.3 Collection House's Whistleblower Policy (Policy) provides whistleblowers, who may be an employee or an 'eligible whistleblower' as defined under the *Corporations Act 2001 (Act)*, with a supportive work environment in which concerns regarding any misconduct or improper state of affair or circumstances (including unethical, illegal, corrupt or other inappropriate conduct) can be raised, without the whistleblower being subject to any form of retaliation or victimisation.
- 1.4 The purpose of this Policy is to:
  - encourage whistleblowers to raise concerns of misconduct or improper state of affair or circumstances ("*Improper Conduct*")
  - set out the avenues available to whistleblowers to report concerns of Improper Conduct
  - detail the protection and support offered to whistleblowers
  - outline the process followed in dealing with concerns of Improper Conduct raised by whistleblowers.

## 2 SCOPE

- 2.1 This Policy, and the whistleblower protections outlined, applies to whistleblowers who may be employees or an 'eligible whistleblower' as defined under the Act. The definition seeks to include most people with a connection to a company or organisation who may be in a position to observe or be affected by misconduct and may face reprisals for reporting it.
- 2.2 An eligible whistleblower in relation to Collection House is defined as a current or former:
  - employee
  - Officer (usually Director or Company Secretary)
  - contractor, including an employee of a contractor who has supplied goods or services
  - supplier
  - associate
  - spouse, relative or dependant of one of the people referred to above.

### 3 POLICY STATEMENT

- 3.1 This Policy outlines Collection House's procedures and the whistleblower protection and support available to a whistleblower who has disclosed Improper Conduct to the following eligible recipients:
- the Whistleblower Protection Officer
  - an Executive Leadership Team member
  - the Chair or a Non-Executive Director of the Collection House Board
  - Collection House's External Auditor.
- 3.2 Improper Conduct is defined as any conduct that is:
- dishonest or unethical
  - fraudulent or corrupt
  - illegal, such as theft, violence or threats of violence, or use of illicit drugs
  - a significant misuse or mismanagement of Collection House resources
  - a serious risk to public health and safety, or to the environment
  - in breach of Collection House policies and procedures
  - in breach of any legislation applicable to Collection House's operations
  - any other conduct which may have a negative impact on Collection House, whether financial or reputational.
- 3.3 Improper Conduct does not include personal workplace grievances raised by current or former employees. These types of concern are covered by Collection House's grievance procedure and relate to the employee's current or former employment with Collection House. Grievances can include:
- any interpersonal conflict between employees
  - employee transfer, promotion or disciplinary action.
- 3.4 Any eligible Collection House whistleblower is encouraged to report Improper Conduct once they become aware of such activity. The report is expected to be made in good faith, that is, the whistleblower is expected to have reasonable grounds to believe the information being disclosed is true. While there will not be any penalties should the information turn out to be incorrect, the whistleblower must not make a report that they know is not true, or is misleading.
- Where it is identified that an employee has knowingly made a false report, this may be a breach of Collection House's Code of Conduct, which may be considered a serious matter that may result in disciplinary action, including termination of employment, and legal consequences.
- 3.5 This Policy is to be read in conjunction with Collection House's Fraud Prevention and Control Policy (CHG 012).

### 4 ROLES AND RESPONSIBILITIES

#### COLLECTION HOUSE BOARD (BOARD)

- 4.1 The Board, through the Audit & Risk Management Committee (ARMC), is responsible for the ultimate decision-making power regarding reports and investigations under this Policy.

## WHISTLEBLOWER PROTECTION OFFICER

4.2 The Whistleblower Protection Officer is responsible for:

- safeguarding the whistleblower's interests under this Policy
- assisting the whistleblower in maintaining his / her wellbeing
- maintaining the whistleblower's confidentiality, including as required by law
- monitoring complaints received, either via email, STOPLINE or contact from whistleblowers
- reviewing and considering any complaints of detrimental conduct (refer 5.2) or any concern that the whistleblower's disclosure has not been dealt with in accordance with this Policy
- referring any allegation(s) requiring further investigation to the Whistleblower Investigation Officer
- maintaining and updating a register of all allegations received.

4.3 The Whistleblower Protection Officer reports directly to the Chief Executive Officer, and the ARMC.

4.4 The current Whistleblower Protection Officer is the Head of Risk.

## WHISTLEBLOWER INVESTIGATION OFFICER

4.5 The Whistleblower Investigation Officer is responsible for performing and supervising the investigation of allegations of Improper Conduct raised under this Policy.

4.6 The Whistleblower Investigation Officer will carry out a preliminary review of the allegations received and will decide whether the allegations raised should be investigated.

4.7 The Whistleblower Investigation Officer will have access to external subject matter specialists, such as forensic accountants, to assist with any investigations.

4.8 The Whistleblower Investigation Officer will conduct all investigations in a fair and independent manner, and will take all reasonable steps to reduce the risk that the whistleblower's identity may be revealed or made known as a result of the investigation.

4.9 The current Whistleblower Investigation Officer is the Head of People and Culture.

# 5 WHISTLEBLOWER PROTECTION AND SUPPORT

## WHISTLEBLOWER PROTECTION

5.1 Whistleblowers will not be subject to any civil, criminal or disciplinary action for disclosing Improper Conduct covered by this Policy or for their participation in any subsequent investigation.

5.2 Collection House employees, Directors, Officers and contractors must refrain from engaging in any activity that is, or could be, perceived to be detrimental conduct against the whistleblower. Detrimental conduct includes:

- termination of employment or demotion
- victimisation, harassment, bullying, intimidation or unlawful discrimination
- personal or financial disadvantage
- harm or injury, including psychological harm
- reputational damage
- conduct that constitutes retaliation.

- 5.3 While Collection House will take all reasonable steps to protect whistleblowers from detrimental conduct, this Policy may not protect the whistleblower if they are also involved in or connected to the Improper Conduct being disclosed.
- 5.4 When disclosing Improper Conduct, the whistleblower may choose to remain anonymous. In such instances, Collection House will assess the disclosure provided in the same way as if the whistleblower has revealed their identity.
- 5.5 Where the whistleblower has chosen to remain anonymous and the matter has been referred to the Whistleblower Investigation Officer for investigation, the Whistleblower Investigation Officer will take all reasonable steps to reduce the risk that the whistleblower's identity may be revealed or made known as a result of the investigation.
- 5.6 The whistleblower's identity may be revealed in the following circumstances:
- where the whistleblower provides their consent to waive their anonymity
  - where the information is allowed or required by law, for example, disclosure to a legal practitioner to obtain legal advice in relation to whistleblowing protection law
  - where the information is lawfully disclosed to the Australian Securities and Investments Commission, the Australian Competition and Consumer Commission, the Australian Federal Police, or any other regulator or law enforcement agency.

#### WHISTLEBLOWER SUPPORT

- 5.7 Where the whistleblower is a current employee, they will have access to, and are encouraged to access the following:
- Collection House's Employee Assistance Program
  - an independent support person from People and Culture to help with any ongoing concerns they may have
  - third party organisations which specialise in providing health and mental well-being support. Use of these services may require the whistleblower to disclose their identity or information that may lead to the disclosure of their identity.
- 5.8 Where the whistleblower is a former employee or an external party, Collection House will endeavour to provide as much support as practically possible.
- 5.9 The whistleblower should immediately inform the Whistleblower Protection Officer if they are concerned that:
- they may be, are being, or have been subjected to detrimental conduct
  - the disclosure has not been dealt with in accordance with this Policy.
- 5.10 The Whistleblower Protection Officer will consider any such concerns raised by the whistleblower and, where appropriate, may take such action as the Whistleblower Protection Officer considers appropriate.
- 5.11 The whistleblower may escalate, or request that the Whistleblower Protection Officer escalates, concerns directly to the ARMC, if they:
- consider that the Whistleblower Protection Officer has not adequately resolved a complaint regarding detrimental conduct
  - consider that this Policy has not been followed
  - are not satisfied with the findings of any investigation
  - are not satisfied with the decision of the Whistleblower Investigation Officer not to conduct, or discontinue, an investigation.

In such instances, the Whistleblower Protection Officer should be provided with a written submission to be sent to the ARMC outlining their concern(s).

## 6 CHANNELS FOR REPORTING IMPROPER CONDUCT

### INTERNAL REPORTING

- 6.1 Collection House employees should first raise any concerns of Improper Conduct with their Supervisor, Team Leader or People and Culture Business Partner. The Supervisor, Team Leader or People and Culture Business Partner is required to provide details of the allegation(s) to the Whistleblower Protection Officer.
- 6.2 Where this is inappropriate or where the employee does not feel comfortable raising these allegations internally, the employee can contact STOPLINE (refer 6.4 for STOPLINE contact methods) or the Whistleblower Protection Officer (refer 6.10 for details on how to contact the Whistleblower Protection Officer).
- 6.3 Where allegations have not been investigated within two weeks (or 10 business days) from the date the allegation was received, then the employee may wish to contact STOPLINE.

### EXTERNAL REPORTING

- 6.4 A whistleblower can raise concerns of Improper Conduct with STOPLINE using the following channels:

*Online*      <http://clhgroup.stoplinereport.com>

*Email*        [clhgroup@stopline.com.au](mailto:clhgroup@stopline.com.au)

*Phone*        1300 30 45 50 (Australia) / 0800 425 008 (New Zealand / Pacific Islands)  
                  +61 3 9811 3275 (reverse charges)

*Fax*            ATTENTION: CASE MANAGER C/O THE STOPLINE  
                  +61 3 9882 4480

*Post*           ATTENTION: CASE MANAGER  
                  C/O THE STOPLINE  
                  LOCKED BAG 8, HAWTHORN VIC, AUSTRALIA 3122

*App*           Stopline365 (iTunes App Store or Google Play).

- 6.5 A whistleblower may call STOPLINE during business hours (0800 – 2000 Mon – Fri AEST) to speak with a trained STOPLINE interviewer. Any messages left will be responded to within one working day.
- 6.6 The whistleblower may choose to remain anonymous and STOPLINE staff will not ask for any personal details. If the whistleblower does not wish to remain anonymous, the whistleblower's personal details may be provided to the Whistleblower Protection Officer to investigate the allegation(s) disclosed.
- 6.7 If the whistleblower chooses to remain anonymous, STOPLINE will issue a confidential reference and password should the whistleblower wish to enquire about the status of their disclosure at a later date.
- 6.8 STOPLINE will prepare a report detailing the allegations disclosed by the whistleblower. The report will be forwarded to the Whistleblower Protection Officer for review and, if required, to the Whistleblower Investigation Officer to investigate.
- 6.9 The information in the STOPLINE report, and any information provided by whistleblowers during the course of an investigation, will be kept confidential, except as required by law or where disclosure to regulatory authorities and law enforcement agencies is required.

## REPORTING TO WHISTLEBLOWER PROTECTION OFFICER

- 6.10 If a whistleblower is unable to access STOPLINE, they may, under this Policy, choose to contact, either verbally or in writing, to the Whistleblower Protection Officer via the following:

*Email*            [whistleblower@collectionhouse.com.au](mailto:whistleblower@collectionhouse.com.au)  
*Phone*            +61 7 3307 7266  
*Post*                ATTENTION: WHISTLEBLOWER PROTECTION OFFICER  
                          COLLECTION HOUSE GROUP  
                          LEVEL 12, 100 SKYRING TERRACE, NEWSTEAD, QLD, AUSTRALIA 4006

## OTHER REPORTING AVENUES

- 6.11 Where the whistleblower is unable to access any of the reporting channels above, they are able to make a disclosure to the following Collection House parties:
- Directors and Officers
  - Executive Leadership Team member
  - a member of Collection House's External Audit Team, KPMG.
- 6.12 Where the allegations involve either the Chief Executive Officer, the Whistleblower Protection Officer or Whistleblower Investigation Officer, the Chair of the Board and Chief Legal Officer will be responsible for assessing the allegation(s) and determining appropriate next steps.
- 6.13 This Policy does not restrict the whistleblower from disclosing Improper Conduct, providing information to, or communicating with a regulator or law enforcement agency where internal procedures have been improperly followed.

## 7 WHISTLEBLOWING INVESTIGATION PROCESS

- 7.1 The Whistleblower Protection Officer will perform a preliminary assessment of allegations received, either via STOPLINE or via internal or external channels, to determine whether there is a reasonable basis for an investigation into the allegation(s).
- 7.2 The Whistleblower Protection Officer will apply the following criteria, at a minimum, to determine whether there is a reasonable basis for an investigation:
- the allegation(s) falls within the intended scope of this Policy or whether another policy applies (e.g. Collection House's grievance policy)
  - the report contains specific and detailed facts to support the allegations raised, rather than speculative, unsubstantiated or vague allegations of wrongdoing
  - whether the allegations have previously been investigated, and as such, may not warrant a new investigation.
- 7.3 The Whistleblower Protection Officer will advise the whistleblower, assuming the whistleblower can be contacted, as to whether the allegation(s) received are to be investigated. Where the assessment finds that an investigation is required, the Whistleblower Investigation Officer will be requested to investigate the allegation(s) received.
- 7.4 The Whistleblower Investigation Officer will conduct the investigation in a fair, independent and timely manner, as the circumstances allow, and will take all reasonable steps to maintain confidentiality. Collection House employees are required to provide reasonable and timely assistance to the Whistleblower Investigation Officer during the course of the investigation.
- 7.5 The whistleblower is required to keep confidential the fact that an allegation, falling under the scope of this Policy, has been made.

- 7.6 Provided there are no restrictions or other reasonable basis for doing so, parties against whom an allegation(s) has been made will be informed of the allegation, and will be provided with the opportunity to respond to the allegation(s).
- 7.7 Wherever possible and provided the whistleblower's contact details are known, the Whistleblower Investigation Officer will keep the whistleblower and the Whistleblower Protection Officer informed of the progress of the investigation.
- 7.8 The Whistleblower Investigation Officer may conclude the investigation with a report which will include findings on the allegation(s) and a summary of the evidence on which the findings are based, along with recommendations where appropriate. The report is Collection House's report and will not be shared with the whistleblower or the parties against whom the allegations have been made.
- 7.9 The Whistleblower Protection Officer will provide a quarterly report to the ARMC summarising the allegation(s) received in the quarter, whether an investigation was conducted, and the results of any investigation.
- 7.10 The ARMC will ensure that Management takes appropriate corrective action, including where appropriate, reporting any Improper Conduct to relevant government, regulatory and law enforcement agencies.

## 8 GENERAL

- 8.1 Collection House Officers, employees and contractors are required to comply with this Policy. Any breach of this Policy will be taken seriously and may result in disciplinary action, including termination of employment (for Officers and employees) and termination of contractual arrangements (for contractors).
- 8.2 This Policy will be made available to Collection House Officers, employees and contractors on its website and intranet (ODIN). Regular training and awareness of this Policy will be provided to Officers and employees.
- 8.3 This Policy will be reviewed annually to ensure it aligns with the objectives of all relevant legislation.
- 8.4 This Policy may be changed at any time at the Boards' discretion.