

Whistleblower Policy

1. Introduction

Precision Group of Companies Pty Limited and its various group entities which includes the companies listed at <https://www.precision.com.au/precision-group-list-of-companies> (**Precision Group**) is committed to a culture of corporate compliance and highly ethical behaviour.

The Corporations Act gives certain people legal rights and protections as “whistleblowers”, which are explained in this Whistleblower Policy (**Policy**).

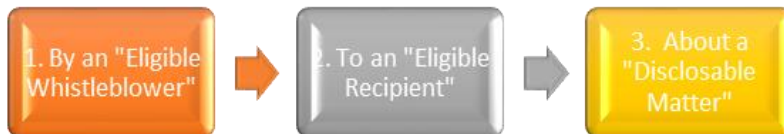
This Policy is intended to provide a mechanism for reporting alleged wrongdoing (as set out in this Policy) that may be occurring at Precision Group in a safe and secure manner, having regard to and in accordance with the requirements of the Corporations Act and the Tax Act.

These types of reports are important to Precision Group’s risk management and corporate governance framework. This Policy also assists Precision Group in meeting its legal and regulatory obligations.

The legal rights and protections for whistleblowers set out in the Corporations Act will only apply if certain requirements and conditions are met. This will depend on:

- (a) the nature of the individual’s role and/or relationship with Precision Group;
- (b) the company or organisation the disclosure is about;
- (c) who the disclosure is made to;
- (d) the subject of the disclosure.

As such, for this Policy and the protections in the Corporations Act to apply, the disclosure must be made:



These requirements are explained in this Policy.

2. Definitions

The following definitions are used this Policy:

- (a) **AFP** means the Australian Federal Police;
- (b) **APRA** means the Australian Prudential Regulation Authority;
- (c) **ASIC** means the Australian Investments and Securities Commission;
- (d) **ATO** means the Australian Taxation Office;
- (e) **Corporations Act** means the *Corporations Act 2001* (Cth);
- (a) **Detrimental Conduct** has the meaning given to in Part 13.2 of this Policy;
- (b) **Disclosable Matter(s)** has the meaning given to in Part 5.1 of this Policy;
- (c) **Discloser** has the meaning given to it in Part 4 of this Policy;
- (d) **Eligible Whistleblower** has the meaning given to it in Part 4 of this Policy;
- (e) **Eligible Recipient** has the meaning given to it in Part 7 of this Policy;
- (f) **Emergency Disclosure** has the meaning given to under the Corporations Act. Please also see the requirements set out in **Annexure C**;
- (g) **Liability Protections** has the meaning given to in Part 13.3 of this Policy;
- (h) **Policy** means this Whistleblower Policy and its annexures;
- (i) **Public Interest Disclosure** has the meaning given to under the Corporations Act. Please also see the requirements set out in **Annexure C**; and
- (j) **Tax Act** means the *Taxation Administration Act 1953* (Cth).

3. Purpose of this Policy

This Policy is an important mechanism for assisting Precision Group to identify corporate wrongdoing that may not be uncovered or identified unless there is a safe and secure means for disclosing wrongdoing, as well as to set out the means by which employees and other Eligible Whistleblowers may disclose such matters.

This purpose of this Policy is to:

- (a) outline the protections that apply for certain individuals who disclose certain types of corporate wrongdoing;
- (b) provide guidance as to when the protections set out in the Corporations Act and Tax Act will apply;
- (c) ensure individuals who disclose corporate wrongdoing in accordance with this Policy can do so safely, securely and with confidence that they will be protected and supported;
- (d) encourage individuals who are aware of corporate wrongdoing at Precision Group, and who fall within the scope of this Policy, to have the confidence to raise the concern using the applicable processes;
- (e) ensure certain disclosures which are covered by the scope of this Policy are dealt with appropriately and on a timely basis;
- (f) provide transparency around Precision Group's framework for receiving, handling and investigating certain disclosures which are covered by the scope of this Policy;
- (g) assist in the deterrence of wrongdoing and encourage more disclosures of wrongdoing;
- (h) support Precision Group's values;
- (i) support Precision Group's long-term sustainability and reputation;
- (j) meet Precision Group's legal and regulatory obligations.

Precision Group encourages those who are aware of possible wrongdoing to make a disclosure.

4. Who does this Policy apply to?

This Policy applies to Precision Group and Eligible Whistleblowers.

Precision Group operates in Australia and New Zealand. This Policy sets out the whistleblower protections that will apply when an allegation of wrongdoing is made in Australia. Precision Group will deal with allegations of corporate wrongdoing made in New Zealand in accordance with the applicable whistleblower laws in New Zealand.

In Australia, an Eligible Whistleblower is entitled to protections under the Corporations Act and Tax Act (these protections are set out in this Policy).

An "**Eligible Whistleblower**" is an individual who is a:

- (a) current or former officer or employee of Precision Group (including employees who are full time, part time, casual, fixed term or temporary, interns, managers, directors or officers);
- (b) current or former supplier of services or goods to Precision Group (whether paid or unpaid), including the supplier's employees (including current and former contractors of Precision Group, consultants, service providers, suppliers and business partners);
- (c) current or former associate of Precision Group; or
- (d) relative, dependant or spouse of an individual in paragraph (a)-(c) above,

who, for the purpose of this Policy, will be referred to as a **Discloser**.

5. What matters qualify for protection under this Policy?

5.1 Disclosable Matters

Under the Corporations Act, a report made by a Discloser will only be eligible for whistleblower protections if it is made about "Disclosable Matters" to an "Eligible Recipient" (as defined in this Policy). For the purposes of the Corporations Act, "**Disclosable Matters**" are:

- (a) information that the Discloser has reasonable grounds to suspect concerns misconduct, or an improper state of affairs or circumstances, in relation to Precision Group such as:
 - (i) fraud;
 - (ii) negligence;
 - (iii) breach of trust or duty;
 - (iv) default;
 - (v) dishonest and unethical behaviour;
 - (vi) conduct which is detrimental to Precision Group and could cause financial or non-financial loss; and
- (b) information about Precision Group where the Discloser has reasonable grounds to suspect that the information indicates Precision Group (including their employees or officers) has engaged in conduct that:
 - (i) constitutes an offence against, or a contravention of, a provision of any of the laws specified in **Annexure A**, or any instrument made under those laws;
 - (ii) constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more;
 - (iii) represents a danger to the public or the financial system; or
 - (iv) is prescribed by regulation.

A Discloser may still qualify for protection under the Corporations Act even if their disclosure turns out to be incorrect.

Some examples of Disclosable Matters include:

- (a) illegal conduct, such as theft, dealing in, or use of illicit drugs, violence or threatened violence, and criminal damage against property;
- (b) fraud, money laundering or misappropriation of funds;
- (c) offering or accepting a bribe;
- (d) financial irregularities;
- (e) failure to comply with, or breach of, legal or regulatory requirements;
- (f) engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made or be planning to make a disclosure.

5.2 Contravention of a particular law not required

Disclosable Matters include conduct that may not involve a contravention of a particular law. For example, it may include:

- (a) 'misconduct or an improper state of affairs or circumstances' which indicates a systemic issue that a regulator may need to be made aware of;
- (b) dishonest or unethical behaviour and practices;
- (c) conduct that may cause harm, or conduct prohibited by Precision Group's standards, policies or code of conduct (to the extent that the conduct complained of does not relate to a personal-work related grievance as defined in Part 6 of this Policy);
- (d) information that indicates a significant risk to public safety or the stability of, or confidence in, the financial system.

6. What types of disclosures not covered by this Policy?

6.1 Non-Disclosable Matters

This Policy does not cover disclosures that are not about Disclosable Matters because such disclosures do not qualify for protection under the Corporations Act.

6.2 Personal work-related grievances

This Policy also does not relate to the disclosure of information by a person to the extent that the information disclosed concerns a "personal work-related grievance". Disclosures that relate solely to personal work-related grievances, and that do not relate to detriment or threat of detriment to a Discloser do not qualify for protection under the Corporations Act.

Personal work-related grievances are grievances where:

- (a) the information concerns a grievance about any matter in relation to the person's employment or engagement with Precision Group having (or tending to have) implications for the person personally; and
- (b) the information:
 - (i) does not have significant implications for Precision Group; and
 - (ii) does not concern conduct, or alleged conduct, which would be a Disclosable Matter under this Policy.

Examples of grievances that may be personal work-related grievances include:

- (a) an interpersonal conflict between the person and another employee;
- (b) a decision relating to the engagement, transfer or promotion of the person;
- (c) a decision relating to the terms and conditions of engagement of the person;
- (d) a decision to suspend or terminate the engagement of the person, or otherwise to discipline the person.

Employees should use the complaints procedure outlined within Precision Group's Grievance Policy for personal work-related grievances.

There may be some personal work-related grievances which qualify for protection under the Corporations Act, for example if:

- (a) a personal work-related grievance includes information about misconduct, or information about misconduct includes or is accompanied by a personal work-related grievance (i.e. a mixed report);
- (b) the Discloser suffers from or is threatened with detriment for making a disclosure;
- (c) Precision Group has breached employment or other laws punishable by imprisonment for a period of 12 months or more.

Disclosures that are not covered by this Policy, may be covered by other legislation such as the *Fair Work Act 2009* (Cth).

6.3 Deliberate False Reports

Deliberate false reports involve a person reporting information which they know to be untrue. It does not include situations where the Discloser reasonably suspects misconduct, but their suspicions are later determined to be unfounded.

Deliberate false reports have the potential to cause significant consequences, such as damaging the reputation of Precision Group or the reputation of any individuals identified in a false report. Precision Group discourages deliberate false reporting.

A person who deliberately submits a false report in relation to a matter covered by this Policy will not be able to access the protections under the Corporations Act or the Tax Act and may also be subject to disciplinary action, up to and including termination of their employment or engagement.

7. Who can receive a disclosure?

To qualify for protection as a whistleblower under the Corporations Act, Disclosers can make a disclosure as follows:

- (a) in relation to Disclosable Matters, to an “**Eligible Recipient**” of Precision Group who may be any of the following:
 - (i) a director or the Company Secretary of the Precision Group;
 - (ii) a senior manager, including the General Counsel;
 - (iii) the auditor or actuary of Precision Group (including a member of an audit team conducting an audit); or
 - (iv) the Deloitte Whistleblower Service; or
- (b) also in relation to Disclosable Matters, any of the following regulatory bodies:
 - (i) ASIC;
 - (ii) APRA;
 - (iii) another Commonwealth body prescribed by applicable regulations; or
 - (iv) ATO (in relation to tax-related matters under the Tax Act); or
- (c) for the purpose of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions in the Corporations Act, a legal practitioner.

Annexure B contains links to the whistleblowing information published by ASIC, APRA and the ATO on their websites.

Precision Group would like to identify and address wrongdoing as early as possible and ensure that a Discloser is advised of the protection available under the legislation. To achieve this objective, **Precision Group encourages Disclosers to make a disclosure to the external Deloitte Whistleblower Service in the first instance** (see Part 8 for details on how this can be done).

The use of the external Deloitte Whistleblower Service is intended to help build confidence and trust in this Policy and its procedures. However, a Discloser may make a disclosure directly to a regulatory body or lawyer without first making the disclosure to one of the Eligible Recipients.

8. How can a disclosure be made?

8.1 Reporting Procedures

Disclosers can report a Disclosable Matter and receive the whistleblowing protections afforded by the Corporations Act by:

- (a) using the external Deloitte Whistleblower Service; or
- (b) contacting one of the internal Eligible Recipients.

When making a report, Disclosers may choose to disclose their name or report the matter anonymously.

Disclosers may also choose to remain anonymous over the course of any investigation into the disclosure and after any such investigation is concluded. A Discloser may also refuse to answer questions which they feel could reveal their identity at any time, including during follow-up conversations.

Disclosers who do decide to remain anonymous should be aware that this may impact Precision Group’s ability to investigate the matter disclosed.

8.2 External reporting of disclosures: Deloitte Whistleblower Service

You can report your whistleblower concern regarding suspected misconduct through Precision Group's external **Deloitte Whistleblower Service**. Disclosers can contact the Deloitte Whistleblower Service through any of the methods set out below:

	Online Use the Online Report Form – this contains step by step instructions to assist you in making your disclosure http://australia.deloitte-halo.com/precision
	Phone Deloitte Whistleblower Hotline - toll free 1800 173 918
	Post Precision Group Reply Paid 12628 A'Beckett Street Melbourne Victoria 8006

Disclosers may choose to stay anonymous when they contact the Deloitte Whistleblower Service. Precision Group recognises that maintaining confidentiality is important to the integrity of the whistleblower concerns process and to protect the welfare of people making reports.

The Deloitte Whistleblower Service will keep any information the Discloser gives about themselves confidential within the Deloitte Whistleblower Service. Telephone calls to the Deloitte Whistleblower Service are not recorded, nor is there a caller ID to identify the call. A report will only be known only by a reference number unless the Discloser chooses to tell the Deloitte Whistleblower Service their name. However, the Deloitte Whistleblower Service will reveal the Disclosers identity if required by law to do so.

Process when making a disclosure to the Deloitte Whistleblower Service

The following outlines the process when a report is made to the Deloitte Whistleblower Service:

- the Discloser should tell the Deloitte Whistleblower Service as much as they can about the Disclosable Matters, for example:
 - (a) names of people involved;
 - (b) names of any witnesses;
 - (c) date, time and location of the misconduct;
 - (d) details of any proof;
 - (e) money or assets involved; or
 - (f) how often you think the incident has happened
- The Deloitte Whistleblower Service will advise the Discloser of the protection available under the legislation.
- The Deloitte Whistleblower Service will provide the information about the Disclosable Matters to the relevant Eligible Recipient at Precision Group (who will be a person who is senior to, and independent of, anyone named in the report).
- If the Discloser provides their name and contact details, this information will only be known to those required to have this information to investigate the Disclosable Matters raised in the report.
- If the Discloser chooses to remain anonymous, feedback will be made available on the Deloitte Whistleblower Service portal which can be accessed using the case ID and password provided at the end of lodging the initial report.
- Disclosers may provide additional information or make note of any concerns of adverse treatment, via the Deloitte Whistleblower Service portal once the initial report has been logged.

8.3 Internal reporting of disclosures: Eligible Recipients

Should a Discloser choose not to use Deloitte Whistleblower Service for any reason, Disclosable Matters may be reported to any of the internal Eligible Recipients identified in this Policy.

For example, disclosures can be made to Precision Group's **General Counsel and Company Secretary**, using the below options:

- (a) via **telephone** on 02 9225 1400
- (b) via **post** to GPO Box 4250, Sydney NSW 2001, Attention: General Counsel and Company Secretary and marked "**Strictly Confidential**"

The above options allow for disclosures to be made anonymously and/or confidentially, securely and outside of business hours.

When reporting Disclosable Matters internally, to remain anonymous Disclosers may:

- (a) adopt a pseudonym; or
- (b) send an anonymous letter via post.

9. Handling and Investigating a Disclosure

9.1 Receipt of a Disclosure

Where Precision Group receives a disclosure (either through the Deloitte Whistleblower Service or internally), Precision Group will need to assess the disclosure and determine whether:

- (a) the disclosure qualifies for protection; and
- (a) if a formal, in-depth investigation is required.

9.2 Investigating a Disclosure

If an investigation is undertaken into a disclosure, the way any investigation is conducted may vary depending on the nature and circumstances of the disclosure. Precision Group will endeavour to ensure that any investigation is conducted objectively and fairly and, so far as reasonably practicable and to the extent permissible by law, on a confidential basis.

The key steps that Precision Group will take after receiving a disclosure and in the event of an investigation are contained in **Annexure D** of this Policy, however, Precision Group, at its discretion, may vary these steps as required.

If Precision Group decides that an investigation is appropriate, it will need to determine:

- (a) the nature and scope of the investigation;
- (b) the person(s) internally or externally who should lead the investigation;
- (c) the nature of any technical, financial or legal advice that may be required to support the investigation; and
- (d) the timeframe for the investigation (Precision Group will endeavour to ensure that timeframes are reasonable).

There may be limitations to Precision Group's ability to properly investigate or make an assessment as to whether a disclosure requires investigation. Precision Group may not be able to undertake an investigation if it is not able to contact the Discloser (e.g. if the disclosure is made anonymously and the Discloser has not provided a means of contacting them).

To protect a Discloser's identity from being revealed and to protect them from Detrimental Conduct, Precision Group may (in its absolute discretion) investigate a disclosure by conducting a broad review on the subject matter or the work area disclosed. In addition, it may investigate an anonymous disclosure, even if it cannot get in contact with the Discloser, if the Discloser has provided sufficient information.

Employees, contractors and consultants of Precision Group must cooperate fully with any investigation conducted.

9.3 Communications to the Discloser

Precision Group will, so far as reasonably practicable, acknowledge receipt of each disclosure received within a reasonable timeframe, provided that the Discloser can be contacted.

If the Discloser can be contacted, Precision Group will, so far as reasonably practicable, provide the Discloser with regular updates in relation to their disclosure (for example, when an investigation is commenced, whilst in progress or upon completion), subject to the considerations of privacy and confidentiality of other persons or those against whom allegations are made. The frequency and timeframes for these updates may vary depending on the nature of the disclosure and the processes adopted in addressing the disclosure

9.4 Outcome of Investigation

If an investigation is conducted by Precision Group, where possible a report will be prepared by the person leading the investigation which details the findings of the investigation. The method for documenting and reporting the findings may vary and will be dependent on the nature of the disclosure and the need to preserve confidentiality.

Relevant persons, including the Discloser, will be notified of the outcome of the investigation where appropriate and/or reasonably practicable in a manner which is deemed suitable by Precision Group in its absolute discretion (for example, in writing or in a meeting). There may be circumstances where it may not be appropriate to provide details of the outcome of the investigation to the Discloser. This will also be considered in the context of the need to preserve confidentiality.

10. Fair Treatment

Precision Group will endeavour, so far as reasonably practicable, to ensure the fair treatment of its employees who are referred to in a disclosure that qualifies for protection under the Corporations Act, including those that may be the subject of a disclosure. To assist Precision Group in achieving this:

- (a) disclosures will be handled confidentiality, when it is practicable and appropriate in the circumstances;
- (b) each disclosure will be assessed;
- (c) the objective of an investigation will be to determine whether there is enough evidence to substantiate or refuse the matters report;
- (d) an employee who is the subject of disclosure will be advised about the subject matter of the disclosure as and when required by the principles of natural justice and procedural fairness prior to any action being taken and the outcome of the investigation;
- (e) an employee who is the subject of a disclosure may access the free and confidential counselling and support services through the Employee Assistance Program provider engaged by Precision Group. See Precision Group's Intranet for contact details.

11. Public Interest Disclosures and Emergency Disclosures

Disclosures may be made to a journalist or parliamentarian under certain circumstances and qualify for protection under the Corporations Act. Such disclosures may be either a Public Interest Disclosure or Emergency Disclosure. Please see **Annexure C** for the requirements for a Public Interest Disclosure or Emergency Disclosure.

It is recommended that a Discloser contacts an independent legal adviser before making a Public Interest Disclosure or Emergency Disclosure.

12. Tax Whistleblower Regime

To qualify for protection under the tax whistleblower regime in the Tax Act, the Eligible Whistleblower can make a disclosure to:

- (a) the ATO or the Tax Practitioners Board if the Discloser considers the information may assist the ATO or the Tax Practitioners Board to perform its duties under a taxation law in relation to Precision Group; or
- (b) an Eligible Recipient for the purposes of the Tax Act, if the Discloser:
 - (i) has reasonable grounds to suspect that the information they intend to provide indicates misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of Precision Group; and
 - (ii) considers the information may assist the Eligible Recipient to perform their functions or duties in relation to the tax affairs of Precision Group; or
- (c) to an entity with the Precision Group for the purpose of obtaining assistance in relation to the operation of the whistleblower protections under the Tax Act; or
- (d) to a lawyer for the purpose of obtaining legal advice or legal representation in relation to the operation of the whistleblower protections under the Tax Act; or
- (e) to a medical practitioner or psychologist for the purpose of obtaining medical or psychiatric care, treatment or counselling.

An “**Eligible Recipient for the purposes of the Tax Act**” includes:

- (a) the persons listed at Part 7; and
- (b) a registered tax agent or BAS agent who provides tax agent services; and
- (c) any employee or officer of Precision Group who has functions or duties that relate to the tax affairs of Precision Group.

Disclosures made under the Tax Act can be reported in the same manner as disclosures under the Corporations Act (i.e. using the external Deloitte Whistleblowing Service or reporting internally).

13. Legal Protections for Disclosers

The protections set out below are available under the Corporations Act and tax Act to Disclosers who qualify for protection as an Eligible Whistleblower.

These protections apply not only to disclosures to an Eligible Recipient of Precision Group, but also disclosures to legal practitioners, regulatory bodies and Public Interests Disclosures and Emergency Disclosures that are made in accordance with the Corporations Act.

13.1 Identity Protection

A Discloser is entitled to the protection of their identity and Precision Group is obligated under the Corporations Act and Tax Act to protect the confidentiality of a Discloser’s identity and information which may lead to the identification of a Discloser. This means that Precision Group cannot disclose the identity of, or information identifying, a Discloser unless the Discloser’s identity or information which may lead to their identification is disclosed to:

- (a) ASIC, APRA or a member of AFP;
- (b) a legal practitioner for the purpose of obtaining legal advice or legal representation; or
- (c) a person or body as prescribed by applicable regulations; or
- (d) any person with the consent of the Discloser.

Additionally, ASIC, APRA or a member of AFP, a Commonwealth, State or Territory authority or a body established under a law of a State or Territory may disclose the Discloser’s identity or information which may lead to their identification.

A person can disclose the information contained in a disclosure with or without a Discloser's consent if:

- (a) the information does not include the Discloser's identity;
- (b) Precision Group has taken all reasonable steps to reduce the risk that the Discloser will be identified from the information; and
- (c) it is reasonably necessary for investigating the issues raised in the disclosure.

It is illegal for a person to identify a Discloser or disclose information that is likely to lead to the identification of the Discloser, unless one of the exceptions outlined above applies.

Whilst Precision Group is committed to protecting the confidentiality and identity of Disclosers (where a Discloser chooses to remain anonymous), please be aware that people may be able to ascertain a Discloser's identity if:

- (a) they have previously mentioned to other people that they are considering making a disclosure;
- (b) they are one of a very small number of people with access to the information; or
- (c) the disclosure relates to information that has previously been told to the Discloser privately and in confidence.

If a Discloser wishes to lodge a complaint with Precision Group about a breach of confidentiality, a **written complaint** should be provided to the General Counsel and Company Secretary, via **post** to GPO Box 4250, Sydney NSW 2001, Attention: General Counsel and Company Secretary and marked **"Strictly Confidential"**.

A Discloser may also lodge a complaint with a regulator (such as ASIC, APRA or the ATO) for investigation.

13.2 Protection from Victimisation and Detrimental Conduct

It is a breach of this Policy and the Corporations Act and Tax Act for a person to cause, or make a threat to cause, detriment to a Discloser in relation to a disclosure because:

- (a) they believe or suspect that the Discloser has made, may have made, or could make a disclosure of a Disclosable Matter which qualifies for protection under the Corporations Act; and
- (b) that belief or suspicion is the reason, or part of the reason, for the person's conduct;

(Detrimental Conduct).

Examples of Detrimental Conduct include:

- (a) dismissal of an employee of Precision Group;
- (b) injury of an employee of Precision Group in their employment with Precision Group;
- (c) alteration of a Precision Group employee's position or duties to their disadvantage;
- (d) discrimination between an employee and other employees of Precision Group;
- (e) harassment or intimidation of a person;
- (f) harm or injury to a person, including psychological harm;
- (g) damage to a person's property, reputation or business or financial position or any other damage to a person.

Detrimental Conduct does not include:

- (a) administrative action that is reasonable to protect a Discloser from detriment (e.g. moving a Discloser who has made a disclosure about their immediate work area to a different work area to prevent them from being exposed to Detrimental Conduct); or
- (b) action taken by Precision Group to manage unsatisfactory work performance or which is in accordance with Precision Group's performance management procedures.

13.3 Liability Protections

A Discloser is protected from any of the following in relation to their disclosure:

- (a) civil liability (e.g. any legal action against the Discloser for breach of an employment contract, duty of confidentiality or another contractual liability);
 - (b) criminal liability (e.g. attempted prosecution of the Discloser for unlawfully releasing information); and
 - (c) administrative liability (e.g. disciplinary action for making the disclosure);
- (collectively the '**Liability Protections**').

However, the Liability Protections do not grant immunity for any misconduct a Discloser has engaged in that is revealed in their disclosure.

13.4 Compensation and Other Remedies

A Discloser may also seek compensation and other remedies through the courts if:

- (a) they suffer loss, damage or injury because of a disclosure; and
- (b) Precision Group failed to prevent the person who caused the loss, damage or injury from causing that loss, damage or injury.

A Discloser is encouraged to seek independent legal advice in relation to compensation and other remedies.

14. Support and Practical Protection for Disclosers

Precision Group will take reasonable steps to support Disclosers and protect Disclosers from Detrimental Conduct. Such measures may be dependent on the circumstances and the measures identified below may need to be varied as required to suit the particular circumstances of the Discloser.

14.1 Identity Protection

Precision Group is committed to taking all reasonable steps to ensure that, to the extent required by law, confidentiality is maintained in relation to the matters pertaining to this Policy and the identity of Disclosers.

Examples of the measures or steps which may be taken by Precision Group to protect the identity of the Discloser include the following:

- (a) redacting all personal information or reference to the Discloser witnessing an event;
- (b) referring to the Discloser in a gender-neutral context;
- (c) where possible, contacting the Discloser to help identify certain aspects of their disclosure that could inadvertently identify them;
- (d) ensuring the handling and investigation of disclosures is conducted by qualified persons;
- (e) ensuring all paper and electronic documents and other materials relating to disclosures is stored securely;
- (f) ensuring access to all information relating to a disclosure is limited to those directly involved in managing and investigating the disclosure;
- (g) only making a restricted number of people who are directly involved in handling and investigating a disclosure aware of a Discloser's identity (subject to the Discloser's consent) or information that is likely to lead to the identification of the Discloser;
- (h) ensuring communications and documents relating to the investigation of a disclosure are not sent to an email address or to a printer that can be accessed by other staff; or
- (i) ensuring each person who is involved in handling and investigating a disclosure is reminded about the confidentiality requirements, including that an unauthorised disclosure of a Discloser's identity may be a criminal offence.

14.2 Protection from Detrimental Conduct

Examples of the measures or steps which may be taken by Precision Group to protect a Discloser from Detrimental Conduct include the following:

- (a) assessing the risk of detriment against a Discloser and other persons (e.g. other staff who might be suspected to have made a disclosure) as soon as possible after receiving a disclosure;
- (b) offering support services (including counselling or other professional or legal services) to Disclosers;
- (c) implementing strategies to help a Discloser minimise and manage stress, time or performance impacts, or other challenges resulting from the disclosure or its investigation, such as allowing the Discloser to perform their duties from another location, reassigning the Discloser to another role at the same level or reassigning or relocating other staff involved in the disclosure;
- (d) endeavouring to ensure that Precision Group's management are aware of their responsibilities to:
 - (i) maintain the confidentiality of a Discloser;
 - (ii) address the risks of isolation or harassment;
 - (iii) manage conflicts; and
 - (iv) ensure fairness when managing the performance of, or taking other management action relating to, a Discloser.

14.3 Reporting Detrimental Conduct

A Discloser who believes they have been subjected to Detrimental Conduct by reason of their status as a Discloser, or any other person who believes they have been subjected to Detrimental Conduct because they have participated in, or assisted with an investigation of a Disclosable Matter, should immediately report the matter to the General Counsel and Company Secretary, via telephone 02 9225 1400.

Where an incident of this nature occurs, an investigation and/or disciplinary action, at the absolute discretion of Precision Group, may follow.

If Detrimental Conduct has been found to have occurred, Precision Group will, so far as reasonably practicable, take measures to protect the Discloser such as, but not limited to, allowing the Discloser to take leave.

A Discloser may also seek independent legal advice or contact regulatory bodies such as ASIC, APRA or the ATO if they believe they have suffered from Detrimental Conduct.

15. Independent Legal Advice

A Discloser may wish to seek independent legal advice in relation to the protections available under the Corporations Act.

16. Breach of Policy

Precision Group will continually monitor compliance with this Policy and will in its absolute discretion, determine to investigate any suspected breach. Precision Group retains the discretion as to how it addresses and investigates any suspected breaches of this Policy. If a breach is found to have occurred, by an employee, contractor or consultant of Precision Group, disciplinary action may follow up to and including termination of the engagement or employment with Precision Group.

17. Further Information

Please contact the General Counsel and Company Secretary, via telephone 02 9225 1400, for further information in relation to this Policy, including information regarding the following:

- (a) how this Policy works;
- (b) what this Policy covers; and
- (c) how a disclosure might be handled.

18. Availability of this Policy

This Policy is available to employees on Precision Group's Intranet and via Employment Hero, our Human Resources Information System (HRIS) platform. It is also available via Precision Group's website at <https://www.precision.com.au/whistleblower-policy>.

Precision Group will also provide training and education to its employees in relation to this Policy.

19. Amendment or withdrawal of this Policy

This Policy will be reviewed on a regular basis to ensure that it remains relevant and appropriate to Precision Group. It is a continuing process.

For the avoidance of doubt, this Policy may be applied, reviewed, varied, replaced or withdrawn at any time at Precision Group's discretion and is not intended to form part of any contract or agreement between any person and Precision Group.

Material Policy Revisions

Version	Effective Date	Details
1	Dec 2019	
2	June 2026	Amended to ensure best practice and legislative compliance

Annexure A – Laws

For the purpose of Part 5.1(b)(i), the following laws are specified:

- (a) the *Corporations Act*;
- (b) the *Australian Securities and Investments Commission Act 2001* (Cth);
- (c) the *Banking Act 1959* (Cth);
- (d) the *Financial Sector (Collection of Data) Act 2001* (Cth);
- (e) the *Insurance Act 1973* (Cth);
- (f) the *Life Insurance Act 1995* (Cth);
- (g) the *National Consumer Credit Protection Act 2009* (Cth);
- (h) the *Superannuation Industry (Supervision) Act 1993* (Cth);

Annexure B – Regulatory Bodies

Australian Securities and Investments Commission (ASIC)

<https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/>

<https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/how-asic-handles-whistleblower-reports/>

Australian Prudential Regulation Authority (APRA)

<https://www.apra.gov.au/become-a-whistleblower-and-make-a-public-interest-disclosure>

Australian Taxation Office (ATO)

<https://www.ato.gov.au/general/gen/whistleblowers/>

Annexure C – Public Interest Disclosures and Emergency Disclosures

The protections set out in the Corporations Act may also apply where a Discloser makes a Public Interest Disclosure or Emergency Disclosure to a parliamentarian or a journalist. The protections only apply in limited circumstances (as set out in the table below). If a Discloser makes a report to the public in another way (other than as set out below), the protections will not apply.

The table below sets out the requirements that must be fulfilled before a Discloser can make a Public Interest Disclosure or Emergency Disclosure to a journalist or parliamentarian (Commonwealth, state or territory). All criteria must be fulfilled for the Discloser to be afforded the whistleblower protections under the Corporations Act.

Criteria	Public Interest Disclosure	Emergency Disclosure
Previous report	The Discloser must have previously made a report to ASIC or APRA or another Commonwealth authority prescribed by regulation about a Disclosable Matter.	The Discloser must have previously made a report to ASIC or APRA about a Disclosable Matter.
Time limit	At least 90 days have passed since the Discloser reported the Disclosable Matters to ASIC or APRA, and the Discloser <u>does not have</u> reasonable grounds to believe that action to address the concerns is being, or has been, taken.	No time limit.
Public interest / Emergency	The Discloser has reasonable grounds to believe that reporting the Disclosable Matters to a journalist or parliamentarian would be in the public interest.	The Discloser has reasonable grounds to believe that the Disclosable Matters raised in the report concerns a substantial and imminent danger to the health or safety of one or more people or to the natural environment.
Written notice to ASIC or APRA	90 days from when the Discloser made the report to ASIC or APRA or the Commonwealth authority prescribed by regulation, the Discloser must give ASIC or APRA or the Commonwealth body written notice that includes sufficient information to identify the earlier report and states the Discloser's intention to make a public interest disclosure (e.g. by contacting the officer who considered the initial concerns and quoting the reference number of the case).	The Discloser must give ASIC or APRA or the Commonwealth authority written notice that includes sufficient information to identify the earlier report and states the Discloser's intention to make an emergency disclosure (e.g. by contacting the officer who considered the initial concerns and quoting the reference number of the case).
Recipient – journalist or parliamentarian	The Discloser must report the Disclosable Matters to a journalist or a parliamentarian (Commonwealth, state or territory). The extent of the information disclosed must be no greater than is necessary to inform the recipient about the Disclosable Matters.	The Discloser must report the Disclosable Matters to a journalist or parliamentarian (Commonwealth, state or territory). The extent of the information disclosed is no greater than is necessary to inform the recipient about the substantial and imminent danger.

Annexure D – Key Steps of Receipt of Disclosures and Investigations

The below sets out the key steps that may be taken in relation to a disclosure made under this Policy.

Please be aware that the key steps below may be varied as required and at the sole discretion of Precision Group to suit the circumstances of the disclosure and the persons involved. If an external investigator is appointed or is conducting the investigation on Precision Group's behalf the external investigator may also vary the steps below at their discretion.

