



WHISTLEBLOWER POLICY

Purpose

This policy aims to provide eligible parties with the opportunity to report actual or suspected wrongdoing or misconduct within Grief Journeys Ltd. Grief Journeys is committed to an ethical culture and compliance with legal and corporate responsibilities, and to promoting a culture where members of our community can speak up and be supported.

Scope

This policy applies to current and former Directors, contractors, volunteers, students and participants of Grief Journeys Ltd.

Definitions

Reportable conduct to appropriate external agency

- Fraud, theft or dishonest conduct (including falsification of records);
- Bribery, corruption, money laundering or secret commissions;
- Illegal, unethical or improper conduct (drug use, violence, criminal damage);
- Breach of employment, labour or workplace health and safety or any other laws;
- Conduct that damages our reputation or brand or relationships with third parties;
- Breach of an internal policy (e.g. the Constitution or Conflict of Interest Policy);
- Breaches of confidentiality and disclosure of confidential information;
- Representing a danger to the public or the financial system;
- Any other inappropriate behaviour, misconduct or improper state of affairs;
- An offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more; and/or
- Prescribed by regulations under the Corporations Act, 2001.

Whistleblower

A person who speaks up to report wrongdoing or misconduct under this policy is known as an eligible whistleblower. An eligible whistleblower has legal rights under the Corporations Act and other legislation (tax laws).

Policy

1. Members of the Grief Journeys community are encouraged to speak up and report any actual or suspected wrongdoing or misconduct. Grief Journeys is committed to fostering a safe speak up culture and will protect anyone who speaks up.
2. A whistleblower can choose to provide their details or remain anonymous. In all circumstances, the identity of the person and the information they provide, will be confidential. Grief Journeys will only share the name and the information provided with the person's consent or if the law requires it.
3. Whistleblowers are encouraged to report to Grief Journeys in the first instance wherever possible. The Directors will assess the report and take all reasonable and appropriate actions to consider, investigate and resolve the concerns raised. However, whistleblowers may also report the actual or suspected wrongdoing or misconduct (reportable conduct) to an external agency.
4. Grievances related to the work carried out by contractors and volunteers for Grief Journeys are not regarded as reportable conduct and will be addressed using the Grievance Policy.
5. Any person reporting actual or suspected wrongdoing or misconduct will not be disadvantaged or treated unfairly.
6. A Director will be allocated to provide support to the person making the report or wrongdoing or misconduct, as Grief Journeys understands that reporting is a stressful process.
7. Should an investigation proceed, Grief Journeys will provide regular updates and share the final report with the person who reported actual or suspected wrongdoing or misconduct.

Responsibilities

The **Directors** have responsibility for the oversight of policy implementation. If an investigation is required, the Directors may appoint an independent person to investigate the report.

Related Documents

Constitution

Conflict of Interest Policy

Work Health and Safety Policy

Financial Controls Policy

Grievance and Complaints Policy

Version Control

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