



Whistle Blowers Policy

Just Focus Pty Ltd

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Policy Statement

Just Focus recognises that any genuine commitment to detecting and preventing illegal and other undesirable conduct must include, as a fundamental cornerstone, a mechanism whereby employees and others can report their concerns freely and without fear of repercussion. This Whistleblower Policy provides such a mechanism and encourages the reporting of such conduct.

Objectives of the Policy

The objectives of this Policy are to:

- encourage disclosures of Potential Misconduct;
- help deter Potential Misconduct, in line with Just Focus's risk management and governance framework;
- ensure that individuals who disclose Potential Misconduct can do so safely, securely and with confidence that they will be protected and supported;
- ensure that disclosures are dealt with appropriately and on a timely basis;
- provide transparency around Just Focus's framework for receiving, handling and investigating disclosures; and
- meet Just Focus e's legal and regulatory obligations.

Just Focus will not tolerate anyone being discouraged from Speaking Up or being subject to detriment because they want to Speak Up or they have done so. Disciplinary action, up to and including termination of employment or engagement, may be imposed on anyone shown to have caused detriment to a person because they want to, or have, Spoken Up.

Who the Policy applies to

Anyone with information about Potential Misconduct is encouraged to Speak Up.

This Policy applies to an individual who is:

- a current or former Just Focus employee, including employees who are permanent or part-time;
- a service provider or contractor who is providing, or has provided goods or services to Just Focus; and
- a relative, dependent, or spouse of an individual identified in (a) or (b) above.

What matters can be reported under the Policy

Examples of Potential Misconduct



Just Focus encourages any individual to Speak Up about Potential Misconduct. You should provide as much information as possible, including details of the Potential Misconduct, people involved, dates, locations and if any more evidence may exist.

When Speaking Up, you will be expected to have reasonable grounds to suspect the information you are disclosing is true and accurate from first-hand knowledge, but you will not be penalised if the information turns out to be incorrect. However, you must not make a report that you know is untrue or misleading. Deliberate false reporting will not be covered by this Policy and will not be a protected disclosure. Where it is found that the person Speaking Up has knowingly made a false report, this may result in disciplinary action.

Examples of Potential Misconduct include but are not limited to:

- failure to comply with, or breach of legal or regulatory requirements;
- breach of Just Focus's Code of Conduct or other Just Focus policies, standards or codes;
- 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 of a Potential Misconduct;
- criminal activity;
- bribery or corruption;
- conduct endangering health and safety or causing damage to the environment;
- dishonest, unethical or irresponsible behaviour;
- conflicts of interest, including those relating to outside business interests, relationships, improper payments and donations;
- victimisation or harassment;
- modern slavery, which exists if a person is not working of their own free will, is treated like property, or is seriously exploited or abused. Examples of modern slavery are human trafficking, slavery and slavery-like practices, forced labour, servitude, early and forced marriage, debt bondage and forms of child labour;
- misleading or deceptive conduct, including conduct or representations which amount to improper or misleading accounting, taxation or financial reporting practices;
- conduct endangering the health and safety of any person or persons;
- breaches of privacy;
- unauthorised use of Just Focus's confidential information;
- concerns that pose a danger to the public or financial system (even if it does not involve a breach of law); and deliberate concealment of any of the above.

Personal work-related grievances

Disclosures that relate solely to personal work-related grievances, and do not relate to detriment or threat of detriment to the person Speaking Up, are not covered by this Policy.

Personal work-related grievances are those that relate to your current or former employment and only have implications for you personally, with no other significant implications for Just Focus or other matters of misconduct beyond your personal circumstances.

Examples of personal work-related grievances include:

- an interpersonal conflict between you and another employee;
- a decision that does not involve a breach of workplace laws;
- a decision about your engagement, transfer or promotion;
- a decision about your terms and conditions of engagement; or
- a decision to suspend or terminate your engagement, or otherwise to discipline you.

However, If the personal work-related grievance includes information about a Potential Misconduct, or suggests misconduct beyond your personal circumstances, the personal work-related grievance may qualify for whistleblower protections under this Policy. Examples of a personal work-related grievance mixed with a Potential Misconduct include:

- where there is a breach of employment or other laws punishable by imprisonment for a period of 12 months or more;
- engaging in conduct that represents a danger to the public; or you suffer from or are threatened with detriment for making a disclosure.

How to Speak Up

How to report a Potential Misconduct

You are encouraged to Speak Up to the Whistleblower Protection Officer (WPO) in the first instance. The WPO is the individual within Just Focus who has specific whistleblower responsibilities under this Policy. This includes protecting and safeguarding the interests of the person Speaking Up.

Any reports received will be referred to the WPO unless there are exceptional circumstances.

You can Speak Up to a legal practitioner for the purposes of obtaining legal advice or legal representation about the whistleblower requirements.

Can I Speak Up anonymously?

You can choose to Speak Up in a confidential manner, anonymously or in a partially anonymous manner.

You can make a confidential disclosure where your identity is known to the WPO and relevant stakeholders involved in the investigation and reporting of the Potential Misconduct. This is the preferred option as it allows the matter to be fully investigated whilst providing you with ongoing protection and support.

You can also choose to be partially anonymous where only the WPO is aware of your identity and a pseudonym is used so your identity is not known to others. This may create some limitations to the investigation process.

You can make an anonymous disclosure if you do not want to reveal your identity. This is the least preferred option as it may not be possible to investigate the report if Just Focus is unable to contact you for further information and it may make it difficult to offer you the same level of practical support if Just Focus does not know your identity.

What protection exists if I Speak Up under the Policy?

Protecting your identity

Just Focus will look to protect the identity of people who Speak Up. Your identity (and any information Just Focus has because of your report that someone could likely use to work out your identity) will only be disclosed if you give your consent to Just Focus to disclose that information or in exceptional circumstances where the disclosure is allowed or required by law.

All information, documents, records and reports relating to the investigation of a Potential Misconduct will be confidentially stored and retained in an appropriate and secure manner. Access to all information relating to the disclosure will be limited to those directly involved in managing and investigating the disclosure. Only a restricted number of people who are directly involved in handling and investigating the disclosure will be made aware of your identity (subject to your consent) or information that is likely to lead to the identification of your identity.

You can lodge a complaint with the WPO, or a regulator for investigation if you believe that is a breach of confidentiality under this Policy.

Protecting you from detriment

You will not be penalised or subject to any detriment for Speaking Up. It is unlawful to cause detriment to you or another person on the belief or suspicion that a report has been, or will be, made, regardless of whether the report was made. Just Focus will not tolerate such unlawful behaviour.

Examples of detrimental conduct include (but is not limited to):

- dismissal of an employee;
- injury of an employee in their employment;
- alteration of an employee's position or duties to his or her disadvantage;
- discriminatory behaviour towards the employee;
- harassment or intimidation of a person;
- harm and injury to a person, including psychological harm; or
- damage to a person's property, reputation, business or financial position.

Reasonable administrative or management action such as managing your unsatisfactory work performance does not constitute a detriment if the action taken is consistent with Just Focus's performance management process. An administrative action that is reasonable for the purpose of protecting you from risk of detriment is not detrimental conduct. For example, Just Focus may ask you to perform your duties from another location,

reassigning you to another role at the same level, make other modifications to your workplace or the way you perform your work duties.

If you believe you have been subjected to a detriment because of the actual or intended disclosure, you should immediately report the matter to the WPO so prompt action can be taken to protect against further detrimental acts or omissions. Reports of detrimental conduct will be treated confidentially. You may also seek independent legal advice or contact regulatory bodies if you believe you have suffered a detriment.

Anyone engaging in unlawful detrimental conduct may be subject to disciplinary action. The action taken will depend on the severity of the breach, and may include a reprimand, formal warning, demotion, and/or termination of employment in the case of employees, or termination of contract in the case of suppliers.

Protection from civil, criminal and administrative liability

You may be entitled to protection from civil liability, criminal liability and administrative liability (including disciplinary action) in respect of the disclosure. Note that the whistleblower protections do not grant immunity for any Potential Misconduct you have engaged in that is revealed in the report.

Compensation and other remedies

Any person who has suffered a detriment because of Just Focus's failure to take reasonable precautions and exercise due diligence to prevent the detrimental conduct may be entitled to compensation or some other legal remedy through the courts. A person who is unsure of the protections or rights to compensation under the whistleblower laws should seek independent legal advice from a legal practitioner.

What happens once a report is made?

Investigating the disclosure

All reports of misconduct under this Policy will be dealt with promptly, fairly and objectively. Just Focus's response to a report will vary depending on the nature of the report and the amount of information provided. Your report may be addressed and resolved informally or through formal investigation.

While Speaking Up does not guarantee a formal investigation, all reports will be properly assessed and considered by the WPO and a decision made as to whether it should be investigated.

If the WPO determines that an investigation is required, the WPO will undertake an investigation with the objective of locating evidence that either substantiates or refutes the claims of Potential Misconduct. The WIO may engage external professionals to assist in any investigation.

Just Focus is committed to implementing the findings and recommendations of any investigation with a view to rectifying any wrongdoing as far as is practicable in the circumstances.

Confidentiality of your identity

Just Focus will maintain the confidentiality of your identity unless the disclosure is authorised under law, or you consent to the disclosure of your identity.

Information obtained from you will only be disclosed to the extent reasonably necessary to conduct an investigation into the matter and Just Focus will take all reasonable steps to reduce the risk that your identity will be identified as a result of the disclosure.

Keeping you informed

Assuming your identity is known and where appropriate, you will be kept informed and updated during the following key stages of the investigation:

- when the investigation process has begun;
- while the investigation is in progress; and
- after the investigation has been finalised.

There may be some circumstances where it may not be appropriate to provide details of the outcome to you. You will not be provided with a copy of the investigation report.