



Revision	Drafted By / Date	Approved By / Date	Issued By / Date
01	Natalie Freeman 02/05/2024	MD Board Members	19/07/2024

Mater Dei is committed to the highest standards of conduct and ethical behaviour in its activities and to promoting a culture of honest and ethical behaviour, compliance and good governance. This policy applies to all employees of the organisation, contractors, volunteers, directors and officers.

This policy deals with certain issues relating to misconduct, malpractice, internal controls and conflicts of interest to ensure compliance with laws and regulations applicable to Mater Dei and its employees, contractors, volunteers, directors and officers and to deal with concerns that are likely to arise in the work environment.

Policy and Objectives

- ❖ A whistleblower is protected against adverse employment actions (dismissal, demotion, suspension, harassment or other forms of discrimination) for raising allegations of malpractice, misconduct, internal controls and conflict of interest, even if proven to be incorrect or unsubstantiated.
- ❖ Employees who participate or assist in any investigation shall also be protected. Every effort shall be made to protect the anonymity of the whistleblower, however there may be situations where anonymity cannot be guaranteed. In such situation, the whistleblower shall be fully briefed.
- ❖ This policy is not designed to deal with general employment grievances and complaints.
- ❖ All employees should be aware that if an employee makes a false report deliberately, maliciously or for personal gain, that employee may face disciplinary action.

The objectives of this policy are to:

- ❖ Encourage employees to disclose any malpractice, misconduct, or conflict of interest of which they become aware.
- ❖ Provide protection for employees who report allegations of such malpractice, misconduct or conflicts of interest.



- ❖ Ensure that all allegations are thoroughly investigated with suitable action taken, where necessary.

Below are some examples of reportable malpractice, misconduct or conflicts of interest:

- ❖ Dishonesty
- ❖ Fraud
- ❖ Corruption
- ❖ Illegal activities including theft, selling of drugs / use of drugs, threatening violence or criminal damage against company assets or property
- ❖ Discrimination, vilification, sexual harassment, harassment, bullying and victimisation
- ❖ Actions or omissions in breach of Commonwealth or State Legislation, or local authority by laws
- ❖ Unethical behaviour
- ❖ Other serious improper conduct (including gross mismanagement, serious and substantial waste of Mater Dei resources, or repeated breaches of administrative procedures)
- ❖ Unsafe work practices
- ❖ Any other conduct which may cause financial or non-financial loss to Mater Dei or be otherwise detrimental to the interests or reputation of Mater Dei or any of its employees
- ❖ The deliberate concealment of information tending to show any of the matters listed above

Protection of the Whistleblower

This policy protects the whistleblower against any reprisals, and the claim is:

- ❖ Submitted in good faith and without any malice or intentionally false allegations.
- ❖ Based on the whistleblower's reasonable belief the malpractice, misconduct or issue related to the malpractice or misconduct constitutes or may constitute, a serious violation.
- ❖ Does not result in a personal gain or advantage to the whistleblower.



Mater Dei or its directors, officers, employees and agents will not penalise, dismiss, demote, suspend, threaten or harass a whistleblower, or transfer the whistleblower to an undesirable job or location, or discriminate in any manner against the whistleblower, to take reprisals or retaliate as a result of the whistleblower having reported any act that is illegal or unethical or deemed to be illegal or unethical, unless the whistleblower is a participant in the illegal or unethical act(s).

Mater Dei considers any reprisals against a whistleblower to be a serious breach of this policy and one likely to result in disciplinary measures, including dismissal. This protection applies to anyone providing information related to an investigation pursuant to this policy.

Confidentiality

Mater Dei recognises that maintaining confidentiality is crucial in ensuring a potential whistleblower comes forward and discloses their knowledge or suspicions about malpractice or misconduct in an open and timely manner and without fear of reprisals being made against them.

Mater Dei will take all reasonable steps to protect the identity of the whistleblower and will adhere to any statutory requirements in respect of the confidentiality of disclosures made.

In appropriate cases, disclosure of the identity of the whistleblower of the allegation made by them may be unavoidable, such as if court procedures result from a disclosure pursuant to this policy.

Reporting Procedures

Any person who has reasonable grounds to suspect that malpractice or misconduct has occurred is encouraged to report that suspicion to the person's Program Manager, or if this is considered inappropriate, is encouraged to raise any concerns with People and Culture Team. Any items or concerns may also be raised with the Mater Dei CEO.



All claims of malpractice or misconduct should provide specific, adequate and pertinent information with respect to, among other things, dates, places, persons / witnesses, amounts and other relevant information in order to allow for a reasonable investigation to be conducted.

If the whistleblower discloses their name, the person receiving the claim will acknowledge the complaint and may initiate a follow up meeting. However, if the claim is submitted on an anonymous basis there will be no follow up meeting regarding the claim or malpractice or misconduct and Mater Dei will be unable to communicate with the whistleblower if more information is required, or if the matter is to be referred to external parties for further information.

Remember that all claims of malpractice or misconduct are treated on a confidential basis. Whistleblowers are encouraged to disclose their identity to obtain the protection afforded to them at law.

Procedures Following Disclosure

Once a report of a suspected malpractice or misconduct has been received from a whistleblower who has provided reasonable grounds for their belief that malpractice or misconduct has occurred, an investigation of those allegations shall commence

Investigations

Investigations will be conducted promptly and fairly with due regard for the nature of the allegation and rights of the persons involved in the investigation. Evidence, including any materials, documents or records shall be held securely by the investigator. The person receiving the disclosure must report it as soon as possible to the CEO.

The CEO shall then determine if the allegation is, in fact, pertinent to any of the issues mentioned in this policy. The CEO will determine the appropriate method for the investigation. In appropriate cases, the CEO may ask for assistance of an internal or external accounting or legal specialist as the CEO deems necessary.

During the investigation, the investigator shall have access to any of the relevant materials, documents and records. The directors, officers, employees and agents of the Company must cooperate fully with the investigator. During the investigation, the CEO



will use all reasonable means to protect the confidentiality of the information regarding the whistleblower.

Reporting

At the conclusion of the investigation, the investigator will prepare a report of the findings for the CEO.

Where the final report indicates that malpractice or misconduct has occurred, the final report will include recommendations for steps to be taken to prevent the malpractice or misconduct from occurring in the future, as well as any actions that should be taken to remedy any harm or loss arising from the malpractice or misconduct. This may include disciplinary proceedings against the person responsible for the conduct, the referral of the matter to appropriate authorities, as deemed necessary by the CEO.

Communications to the Whistleblower

Mater Dei will ensure that, provided the claim was not submitted anonymously, the whistleblower is kept informed of the outcomes of the investigation of the relevant allegations, subject to the considerations of privacy of those against whom allegations are made.