



## Whistleblower Policy

At Oakenwoods Group Ltd, we value integrity, transparency, and accountability in all aspects of our operations. This policy outlines our commitment to providing a safe and confidential mechanism for employees, contractors, suppliers, and other stakeholders to report concerns about unethical, illegal, or improper conduct within the organization.

### Scope

This policy applies to all employees, contractors, suppliers, and individuals associated with Oakenwoods Group Ltd, including board members and volunteers. It encompasses any concerns related to fraud, corruption, misconduct, violations of laws or regulations, or any other unethical or improper behaviour within the organization.

### Responsibilities

#### Management:

- Management is responsible for fostering a culture of openness and accountability within the organization and ensuring that all reports of misconduct are taken seriously and investigated promptly.
- They must designate a whistleblower protection officer or team responsible for receiving and handling whistleblower reports in accordance with this policy and relevant laws and regulations.
- Management should provide training and resources to employees and other stakeholders to raise awareness of the whistleblower policy and encourage the reporting of concerns.

#### Whistleblower Protection Officer/Team:

- The whistleblower protection officer or team is responsible for receiving and processing whistleblower reports in a confidential and impartial manner.
- They must ensure that whistleblowers are protected from retaliation or victimisation for making a report in good faith and that appropriate measures are taken to safeguard their confidentiality and anonymity, if requested.
- The whistleblower protection officer or team should conduct thorough and impartial investigations into reported concerns and take appropriate action to address any wrongdoing identified.

#### Employees and Stakeholders:

- All employees and stakeholders are encouraged to report concerns about unethical, illegal, or improper conduct within the organization without fear of reprisal or retaliation.
- They may make a report through designated channels, such as the whistleblower hotline, email, or in person to the whistleblower protection officer or team. Nick Kennedy ([nick.kennedy@oakenwoods.com](mailto:nick.kennedy@oakenwoods.com))
- Employees and stakeholders should provide as much detail as possible when making a report, including specific incidents, individuals involved, and any supporting evidence or documentation.

## Policy Guidelines

*Confidentiality:* Whistleblower reports will be treated with the utmost confidentiality, and the identity of the whistleblower will be protected to the fullest extent possible, consistent with the need to conduct a thorough investigation.

*Non-Retaliation:* Oakenwoods Group Ltd prohibits retaliation or victimisation against whistleblowers for making a report in good faith. Any form of retaliation against a whistleblower will be treated as a serious violation of company policy and may result in disciplinary action, up to and including termination of employment.

*Fair Treatment:* Whistleblowers will be treated fairly and impartially throughout the investigation process, and their concerns will be addressed promptly and appropriately.

*Investigation:* All whistleblower reports will be investigated promptly, thoroughly, and impartially by the whistleblower protection officer or team. Investigations will be conducted in accordance with established procedures and principles of natural justice.

*Follow-Up:* Whistleblowers will be kept informed of the progress and outcome of the investigation to the extent possible, while still maintaining confidentiality and protecting the rights of all parties involved.

## Reporting Process

*Internal Reporting:* Whistleblowers may make a report internally through designated channels, such as the whistleblower hotline, email, or in person to the whistleblower protection officer or team.

*External Reporting:* Whistleblowers who believe that their concerns have not been adequately addressed internally or who wish to report anonymously may make a report to external authorities, such as regulatory agencies or law enforcement, in accordance with applicable laws and regulations.

*Protection of Identity:* Whistleblowers who wish to remain anonymous may do so, and their identity will be protected to the fullest extent possible under the law. However, anonymous reports may limit the ability to conduct a thorough investigation.

## Review and Updates

This policy will be reviewed periodically to ensure its effectiveness and compliance with Australian legislative requirements and best practices in whistleblower protection. Updates may be made as necessary to reflect changes in laws, regulations, or organizational procedures.



The Board of Directors of Oakenwoods Group Ltd fully endorses this Policy.

I personally commit Oakenwoods Group Ltd to this Policy.

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Nick Kennedy  
Managing Director  
Oakenwoods Group Ltd

21 January 2025