



ELDERS

WHISTLEBLOWER
POLICY

DOCUMENT CONTROLS

Distribution	All
Location	
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Document Summary

Description	This document details the systems in place and support provided for staff in reporting corrupt, illegal or other undesirable conduct.
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Document History and Revisions

Version	Date	Description of version & changes	Changes Prepared by	Changes reviewed by	Approval	Date
1.0	Sept 2011	Final Version			Johan Reeder	
2.0	Feb 2012	New title, consolidation of policy	Craig Porter	Nina Abbey	Nina Abbey	14/06/13
3.0	June 2015	Update of contacts and job titles	Craig Porter			03/06/14

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POLICY STATEMENT

Elders is committed to ensuring high standards of conduct and ethical behaviour amongst all Elders People and to ensuring that staff, or others, can raise matters regarding conduct or activities they have concerns about, without fear of reprisal.

POLICY OBJECTIVES

To ensure all staff discharge their duties and obligations honestly and in accordance with all laws, regulations and Company policies including the Code of Conduct; and that staff are aware of their obligations to report any instances of misconduct.

POLICY SCOPE

This policy applies to all of Elders and to everyone who, directly or indirectly, has an interest in the Elders including, but not limited to, members of the public, customers, contractors, consultants, agents, Directors and employees.

This policy is in accordance with AS8004-2003 Whistleblower Protection Programs for Entities.

DEFINITIONS

Elders means **Elders Limited** (ACN 004 336 636) and its subsidiaries.

External Service Provider – The STOPline

Whistleblower Protection Officer – Company Secretary (or delegate) who is to take any reports made to them, ensure the anonymity of the person making the report, refer the matter to the Whistleblower Investigations Officer; and to report the matter to the Board.

Whistleblower Investigations Officer – Manager - Compliance (or delegate) who is to ensure the claims made in the report are thoroughly investigated and done so in a fair and independent manner; and to make relevant recommendations as a result of those investigations.

POLICY

Unacceptable Conduct

Conduct that may cause loss to Elders or be detrimental to our reputation, or be considered harassment of any sort, unethical, unsafe work practices, other breaches of policy or law or any other serious improper conduct is referred to as 'reportable conduct' and should be reported appropriately.

Some examples of reportable conduct include, but are not limited to:

- Dishonest or corrupt behaviour
- Fraud
- Illegal acts – theft, violence, criminal damage, drug use
- Breaches of laws – Workplace Health & Safety; Environmental; Corporations etc.
- Continued breaches or disregarding of Company policy
- Impeding internal or external audit processes
- Malicious or other inappropriate activity, including threatening violence
- Unsafe work practices
- Serious impropriety
- Improper behaviour relating to accounting, internal accounting controls or audit matter
- Concealment of reportable conduct
- Any similar or related activity that could be considered by the reasonable person to be inappropriate, illegal or unacceptable

Reporting Channels

Normal reporting channels should be used in the first instance. That is, you should report any matters to your immediate supervisor or manager. However, if previous reports have been disregarded, or you feel such a report would be ineffective, or the report is about your immediate manager, then it is appropriate to use other channels described later in this policy.

All reports will be treated seriously and should contain as much factual information as possible. Reports may also be made anonymously.

False Reporting

When it is determined that a person has intentionally or maliciously made a false report then that person will be subject to disciplinary action.

Protection

Anyone making a report, which is not malicious or dishonest, will not be disadvantaged in any way, by actions such as dismissal, demotion, suspension, bias or any other detrimental situation. Elders will take steps to protect anonymity if it is possible to do so, as in some circumstances laws may require disclosure of identity. In these instances all reasonable steps will be taken to protect the identity of persons making such reports.

Investigations

The *Whistleblower Protection Officer* will receive reports from the External Service Provider and is responsible for safeguarding the interests of the person making the report and will have direct access to independent financial legal and operational advisers as required.

The *Whistleblower Investigations Officer* is to investigate, or arrange for the substance of the complaint to be investigated, to determine whether there is evidence in support of the matters raised. Investigations will be conducted without bias and any accused will be given an opportunity to respond to the allegations.

Board Reporting

The Whistleblower Protection Officer will provide a summary report to the Board Audit Risk & Compliance Committee on the number, treatment and outcome of any investigations. A report on the effectiveness of the Whistleblower Program will also be made.

HOW TO REPORT UNACCEPTABLE CONDUCT

REPORTS BY STAFF MEMBERS

You should raise any concerns you may have with your manager in the first instance, who should then report the matter to appropriate management in the business unit involved. Reports may also be made to other senior management, to Elders Risk & Assurance or Legal and Compliance staff or the Whistleblower Protection Officer directly.

Alternatively the issue may also be reported via Elders' external reporting service, STOPLine (see contact details below).

REPORTS BY MEMBERS OF THE PUBLIC

Concerns or suspicions regarding unacceptable behaviour can be made to management of the Elders business that you regularly deal with. Alternatively you may report your concerns to our Safety, Risk & Assurance or Legal and Compliance departments, or our external reporting service, both of whose contact details appear below.

CONTACT DETAILS

ELDERS RISK & ASSURANCE

Email – eldersriskassurance@elders.com.au

Phone – 1300 555 927

STOPLine (external service provider)

Email – elders@stoline.com.au

Within Australia: Phone – 1300 304 550

Outside Australia: Phone – 61 3 9811 3275 or reverse charges to

Melbourne Australia 61 3 9811 3275

ASSOCIATED POLICIES & PROCEDURES

- **Code of Conduct**
- **Bribery, Financial Inducements and Facilitation Payments Policy**
- **APP Privacy Policy**
- **One Elders**