

Whistleblower Protection Policy

Overview

Whistleblowing is the act of disclosure by an employee that exposes dishonest or illegal wrongdoings at an organisation. The *Protected Disclosures Act* (the *Act*) (NZ) came into force in 2001 and the purpose of the *Act* is to encourage people to report serious wrongdoing in their workplace by providing protection for employees who want to 'blow the whistle'. The equivalent in Australia is the Public Interest Disclosure Act 2013.

Application

Under this policy the definition of 'NorthWest Personnel' includes all Trustees, Directors, Officers, Managers, employees, contractors and consultants to NorthWest ANZ.

Policy

NorthWest ANZ Whistleblower Protection policy is intended to encourage, support and promote honest and ethical behaviour by providing a framework for employees to escalate reportable conduct.

Under this policy you can report on any conduct that is:

- ▶ dishonest
- ▶ fraudulent
- ▶ corrupt
- ▶ illegal
- ▶ unethical
- ▶ other serious improper conduct
- ▶ an unsafe work practice
- ▶ a repeated breach of Vital policy or administrative procedures; or
- ▶ any other conduct which may cause financial or non-financial loss to Vital or be otherwise detrimental to Vital's interests

Whistleblower protection officers

In the first instance reports of improper conduct should be directed to either the:

- ▶ Chief Executive Officer; or
- ▶ Chief Financial Officer

If for any reason a person feels uncomfortable making a disclosure to either of them then the person can report to the Chair of the Audit Committee.

Whistleblower protection officer's responsibilities

- ▶ determine whether a disclosure satisfies the requirements of this policy and should be investigated
- ▶ determine the appropriate course of action to remediate/act on reportable conduct
- ▶ ensure disclosures are investigated as soon as practicable
- ▶ report any disclosure of reportable conduct against a Director or the Chief Executive Officer to the Chair of Vital's Board immediately.
- ▶ retain records of disclosures securely

- ▶ not victimise an employee who makes a disclosure
- ▶ take appropriate disciplinary action against any person who victimises
- ▶ protect the interests of any employee who makes a disclosure; and
- ▶ ensure details of a disclosure are not released without the consent of the whistleblower (unless required by law).

Employee's responsibilities

As an employee you must:

- ▶ consider whether a matter can be more appropriately escalated or effectively addressed under another NorthWest ANZ policy
- ▶ make disclosures in good faith
- ▶ report concerns about the resolution or the conduct of investigations of disclosures to the Chair of the Audit Committee
- ▶ not disadvantage or victimise another employee who makes a disclosure