



# **Lifeline Australia**

## **Whistleblower Policy**

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## 1. Purpose and Scope

Lifeline Australia is committed to the protection of genuine whistleblowers against any reprisal action taken on the basis of them making a whistleblower report. Through the establishment and implementation of this Whistleblower Policy (**Policy**), Lifeline Australia will continue to support employees and other parties to report instances of wrongdoing and encourage them to do so using the process set out below.

This Policy has been developed to ensure that allegations received from a whistleblower are investigated confidentially, promptly, and fairly, whilst ensuring that the employee making the whistleblower report is afforded the appropriate level of protection. This Policy applies to Lifeline Australia's employees and contractors, including the Executive Leadership Team and Chief Executive Officer (**CEO**).

Lifeline Australia employees are bound by the standards of conduct that are set out in the Code of Conduct by virtue of provisions of their employment or contracts with Lifeline Australia. The purpose of this Policy is to document how to make a whistleblower disclosure, how a whistleblower disclosure will be treated, and the protections afforded to whistleblowers.

## 2. Related Documents

Document	Name
<b>Policies</b>	Code of Conduct
	Employment Conditions Policy
	Delegations Policy
	Information Security Policy
	Privacy Policy
	Fraud Prevention Policy
	Work Health and Safety Policy
	Confidentiality Agreement

## 3. Document History

Version	Date	Author	Change description
1.0	October 2018	Risk & Internal Audit Manager	Reviewed and approved by Board
2.0	June 2023	Head of People & Culture	Full review with FairCall process inclusion and legislative updates applied
3.0	August 2023	Executive Director, People & Culture	Updates to facilitate Board approval
<b>3.1</b>	June 2024	Executive Director, People & Corporate Services	Minor updates applied to align roles and responsibilities

## 4. Definitions

For the purposes of this Policy, the following definitions apply.

<b>Delegate</b>	means the person occupying the position of Head of Risk & Compliance, Company Secretary and/or Chair, Audit and Risk Committee as described from time to time. Employees acting in these positions assume the duties and responsibilities of the Delegate in accordance with this Policy.
<b>Detriment</b>	includes (without limitation): <ul style="list-style-type: none"> <li>dismissal;</li> <li>alteration of an employee's position or duties to his or her disadvantage, including demotion;</li> </ul>

	<ul style="list-style-type: none"> <li>• harassment, intimidation or threats;</li> <li>• discrimination, including bias;</li> <li>• disciplinary action;</li> <li>• injury of an employee in their employment;</li> <li>• harm or injury (including psychological harm);</li> <li>• damage to a person's property; and</li> <li>• reputational, financial, or other unfavourable treatment connected with making a report.</li> </ul>
<b>Disclosable Matter</b>	has the meaning set out in section 5.3 of this Policy.
<b>Investigator</b>	means a person appointed by the Delegate to investigate a Whistleblower Report.
<b>Lifeline Australia</b>	means Lifeline Australia and its related entities.
<b>Personal Work-related Grievance</b>	<p>means a grievance about any matter in relation to the Whistleblower's employment, or former employment, that are solely related to personal employment with Lifeline Australia, and do not involve illegal, dishonest, or improper conduct. Examples of Personal Work-related Grievances include:</p> <ul style="list-style-type: none"> <li>• an interpersonal conflict between the Whistleblower and another employee;</li> <li>• a decision relating to the engagement, transfer or promotion of the Whistleblower;</li> <li>• a decision relating to the terms and conditions of engagement of the Whistleblower; and</li> <li>• a decision to suspend or terminate the engagement of the Whistleblower, or otherwise to discipline the Whistleblower.</li> </ul> <p>However, a Personal Work-related Grievance does not include:</p> <ul style="list-style-type: none"> <li>• any conduct that would be considered victimisation of an individual because they have made, may have made, or propose to make a report under this Policy; or</li> <li>• a matter that would have significant implications for Lifeline Australia.</li> </ul>
<b>Regulations</b>	means any regulations prescribed for the purposes of Part 9.4AAA of the <i>Corporations Act 2001</i> (Cth).
<b>Whistleblower</b>	<p>means one of the following individuals who discloses Wrongdoing:</p> <ul style="list-style-type: none"> <li>• Employees (including permanent, part-time, casual, fixed term or temporary employees, interns, and secondees);</li> <li>• Directors;</li> <li>• Officers;</li> <li>• Contractors to Lifeline Australia (including employees of contractors);</li> <li>• Volunteers to Lifeline Australia;</li> <li>• Suppliers of services or goods to Lifeline Australia (including employees of suppliers);</li> <li>• Associates of Lifeline Australia;</li> <li>• Consultants to Lifeline Australia;</li> <li>• relatives, dependents, spouses, or dependents of a spouse of any of the above; and</li> <li>• an individual prescribed by the Regulations.</li> </ul>
<b>Whistleblower Report</b>	means a communication by a Whistleblower, in writing, containing a disclosure of a known or suspected incidence of a Disclosable Matter. A Whistleblower Report does not need to be made through an employee's manager and can be made directly to the Delegate in accordance with this Policy.
<b>Wrongdoing</b>	means misconduct that generally breaches laws or involves the misuse of a professional position or information obtained in a professional capacity.

## 5. Making a Whistleblower Report

### 5.1. Who can make a report?

Whistleblower Reports may be made by a Whistleblower as defined in clause 4 of this Policy including current or former Lifeline Australia employees, directors, officers, contractors, volunteers, suppliers, associates, consultants and their relatives, dependents and spouses (including dependents of a spouse).

### 5.2. What wrongdoing can be reported?

Lifeline Australia encourages individuals to report actual or suspected Wrongdoing.

A Whistleblower can make a disclosure of information where they have reasonable grounds to suspect that the information concerns misconduct, or an improper state of affairs or circumstances in relation to Lifeline Australia.

### 5.3. Disclosable Matters

A Disclosable Matter means any information where the Whistleblower has reasonable grounds to suspect that Lifeline Australia (or any of its employees or officers) has or may have engaged in conduct that is illegal, unacceptable, or undesirable, or concealment of such conduct. This includes:

- fraud, deceit, or dishonesty, financial or otherwise;
- wrongful or questionable accounting or auditing practices;
- corrupt behaviour;
- illegal or unlawful conduct such as violence, theft, or property damage;
- bribery;
- unethical behaviour including misusing company time or resources, abusive behaviour to others, or action that breaches Lifeline Australia's policies or Code of Conduct;
- other serious misconduct that may be detrimental to the interests, financial or otherwise, of Lifeline Australia;
- legal or regulatory non-compliance including conduct that constitutes an offence against, or a contravention of, any of the following:
  - the *Corporations Act 2001* (Cth);
  - the *Australian Securities and Investments Commission Act 2001* (Cth);
  - the *Banking Act 1959* (Cth);
  - the *Financial Sector (Collection of Data) Act 2001* (Cth);
  - the *Insurance Act 1973* (Cth);
  - the *Life Insurance Act 1995* (Cth);
  - the *National Consumer Credit Protection Act 2009* (Cth); or
  - the *Superannuation Industry (Supervision) Act 1993* (Cth);
- conduct that constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more;
- conduct that represents a danger to the public or the financial system; or
- conduct that indicates any other misconduct, Wrongdoing or an improper state of affairs or circumstances in relation to Lifeline Australia.

### 5.4. Personal Work-related Grievances

Personal Work-related Grievances as defined in Section 4 is not covered under this Policy and should be reported to the relevant Manager or HR Business Partners.

### 5.5. Requirements for disclosure

A Whistleblower must have reasonable grounds for a report made under this Policy. An allegation with no supporting information is unlikely to be considered as having 'reasonable grounds'. However, a Whistleblower will still qualify for protection under this Policy even if their disclosure turns out to be incorrect.

Where a disclosure is made which does not relate to any Disclosable Matter, this disclosure will not qualify for protection. Protections generally do not apply to a person who has deliberately or knowingly made a false disclosure, provided false information, or knowingly made a false claim that a disclosure is protected. Where this has occurred, individuals who are employees of Lifeline Australia may be subject to disciplinary action.

### 5.6. What does a report need to include?

A Whistleblower Report should include as much detail as possible about the suspected Disclosable Matter and include any supporting information such as emails and/or other documents.

As a general guide, a report should include<sup>1</sup>:

- Whistleblower's contact information (including their name, role, business unit, contact number and email);
- Information of the suspected person(s) involved (including their name, role, business unit, contact number and email);
- Information of any witnesses (including their name, role, business unit, contact number and email); and
- Information regarding the issue including:
  - What, Who, When, Where, How;
  - Any evidence that could be provided to the Delegate (documents, photos, data etc);
  - Any other parties who are involved;
  - Any other details or information that will assist in the investigative process;
  - Any other relevant comments; and
  - Date the report and sign it.

A Whistleblower Report form can be found as an annex to this Policy. The form is also located in Lifeline Australia's Policy Repository.

## 5.7. Who do I contact?

Whistleblowers are obligated to report any known or suspected incidence of a Disclosable Matter, by making a disclosure in accordance with this Policy.

Whistleblowers can make a report directly to the Delegate using the following secure address:

[whistleblower@lifeline.org.au](mailto:whistleblower@lifeline.org.au)

Where an employee submits a report to a manager, the manager is obligated to refer the report through to the Delegate. The manager will then confirm in writing to the employee who submitted the report that it has been provided to the Delegate.

In circumstances where a Whistleblower wishes to make a Whistleblower Report that:

- contains allegations about the Head of Risk & Compliance, they should instead refer the matter to the Company Secretary or Audit & Risk Committee Chair for consideration and further action;
- contains allegations about the Company Secretary, they should instead refer the matter to the Head of Risk & Compliance or Audit & Risk Committee Chair for consideration and further action;
- contains allegations about the Audit & Risk Committee Chair, they should instead refer the matter to the Chair of the Board for consideration and further action.

Lifeline Australia encourages employees and other Whistleblowers to make an internal report in the first instance, so that it can identify and address the Disclosable Matter as early as possible. However, the Whistleblower may make a report about a Disclosable Matter to any of the following external bodies: FairCall, as detailed below, ASIC, APRA, or ATO.

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<sup>1</sup> Any information that could potentially compromise your anonymity need not be included at the first instance, noting that in some circumstances, the Delegate will require your identity to appropriately progress a report/investigation.

### 5.7.1. FairCall

Lifeline Australia recognises that a Whistleblower may feel more comfortable discussing matters with an external party. Therefore, Lifeline Australia has authorised KPMG to provide FairCall - a 24/7 independently monitored whistleblower hotline. Disclosures to FairCall can be made anonymously, however it may not be possible to fully investigate anonymous reports.

To report a disclosure to FairCall:

Telephone:	1800 500 965
Online web report:	<a href="https://www.kpmgfaircall.kpmg.com.au/Lifeline">https://www.kpmgfaircall.kpmg.com.au/Lifeline</a>
Post:	FairCall Manager KPMG Forensics PO Box H67 Australia Square Sydney NSW 1213

## 5.8. What happens to the Whistleblower Report once it is made?

All Whistleblower Reports made under this Policy will be:

- received and treated seriously and with the utmost sensitivity;
- assessed to ensure it is a qualifying disclosure and warrants investigation;
- investigated, internally or externally, as appropriate depending on the nature of the reported wrongdoing; and
- dealt with fairly and objectively, in a timely manner.

### 5.8.1. Acknowledgement

The Delegate will endeavour to provide the Whistleblower with written acknowledgement of the Whistleblower Report as soon as practicable, and where possible, no later than 3 business days after it is received.

### 5.8.2. Investigation

The Delegate will consider the information provided in the Whistleblower Report and determine whether an investigation should occur.

The Delegate has the discretion not to investigate a Whistleblower Report if they consider:

- (a) the Whistleblower Report is frivolous or vexatious;
- (b) it is impracticable for the Whistleblower Report to be investigated;
- (c) the same information that was disclosed in the Whistleblower Report is being investigated through another process;
- (d) the Whistleblower does not wish for an investigation to be pursued, and the Delegate is satisfied that there are no matters raised in the Whistleblower Report that warrant investigation; or
- (e) there is not enough information provided to undertake an investigation (particularly in the case of Whistleblower Reports made anonymously).

If the Delegate decides that an investigation should not occur, they will inform the Whistleblower.

If the Delegate decides that an investigation will occur, they are required to observe the rules of natural justice in conducting an investigation, including giving a person a reasonable opportunity to respond to any allegations against them and ensuring that the investigation is conducted independently and without bias.

Whistleblowers will be kept informed of the general progress and outcome of an investigation (subject to considerations of the privacy of those against whom allegations are made). A Whistleblower must not disclose and must keep confidential any details of the investigation, its progress, or its outcome.

An investigation may not be possible if the Whistleblower cannot be contacted or further details cannot be obtained (for example, if a report is made anonymously and no contact details are provided). The Delegate may appoint an objective third party Investigator to assist in conducting the investigation. The Investigator may be an employee or a person external to Lifeline Australia. The Delegate must keep detailed records of steps taken in the conduct of an investigation, including file notes, correspondence, meeting minutes and any other relevant supporting documentation.

### 5.8.3. Findings of Investigation

The Delegate may refer any findings of an investigation to appropriate functional areas or individuals within Lifeline Australia for further consideration.

The Delegate, where possible, will inform the Whistleblower who made the Whistleblower Report of any outcome of an investigation within 14 business days after the investigation has been conducted and reached a conclusion.

### 5.8.4. Health and safety

If the Delegate becomes concerned about the health and safety of a Whistleblower during the investigation, they may discuss with the Whistleblower a range of measures which can be taken to ensure the ongoing welfare of that Whistleblower (or other employees) in the workplace. This includes consideration of any reports of actual or anticipated Detriment against a Whistleblower and whether such Detriment is affecting the Whistleblower's continued health and safety.

## 5.9. Confirming the identity of Whistleblowers

When a Whistleblower makes a Whistleblower Report, their right to anonymity will be fully respected at all times. In some instances, for a Whistleblower Report to be progressed and appropriate action taken, the Whistleblower will need to provide their identity to the Delegate. If the Whistleblower does not wish to do this, the report may be archived if further action is contingent on the Whistleblower coming forward.

## 5.10. Will my identity be protected?

The identity of any Whistleblower who makes a Whistleblower Report will be kept confidential to the extent that it is possible to do so.

All files and information received by the Delegate that relates to a Whistleblower Report will be stored securely and has appropriately restricted access.

Information provided by a Whistleblower will be held in the strictest confidence and will only be disclosed to a person not connected with the investigation of the matters raised:

- if the Whistleblower has been consulted and consents in writing to the disclosure;
- for the purpose of seeking legal or financial advice; or
- where the Delegate or Investigator are compelled by law to do so.

## 6. Immunity from disciplinary action

### 6.1. Protection from Detriment

Lifeline Australia will take all reasonable steps to protect a Whistleblower from detrimental treatment (or Detriment, as defined in section 4 above) and will take appropriate action where any such detrimental treatment is identified.

If a Whistleblower believes they have suffered Detriment because they made a report under this Policy, the Whistleblower should inform an HR Business Partner immediately.

If a Whistleblower considers the matter has not been appropriately addressed, they can refer it directly to the Delegate.

Detriment does not include administrative action that is reasonable to protect the Whistleblower from any Detriment (for example, a temporary transfer), or reasonable management action in relation to managing an employee's work performance, if the action is in line with Lifeline Australia's performance management framework.

### 6.2. Immunity

If an employee makes a Whistleblower Report which involves their own conduct or of which they may be implicated, Lifeline Australia will consider providing that employee with immunity from disciplinary proceedings and immunity against civil liability, to the extent permitted by law.

### 6.3. Liability for own conduct

An employee who is found to have provided false information to a Delegate in an investigation or who has made a Whistleblower Report vexatiously or in bad faith, may be subject to disciplinary action, including and up to termination of employment.

## 7. Ensuring fair treatment

Where Lifeline Australia employees are mentioned in or are related to any Whistleblower Report, Lifeline Australia will take reasonable steps to ensure appropriate and fair treatment of those named employees. This will include:

- keeping the matter as confidential as possible, even if the Whistleblower has consented to the disclosure of their identity;
- only informing Investigators, managers and officers of Lifeline Australia who have a need to know the information for the proper performance of their functions under this Policy, or for the proper investigation of the disclosure;
- advising the employee or officer who is the subject of a disclosure about any allegations against them,



and allowing them the opportunity to respond to those allegations and provide additional information, if relevant, in the course of an investigation into those allegations (subject to the Whistleblower's right to anonymity);

- extending support and protection to individuals who are implicated in the disclosure until the investigation has concluded and claims have been proven or dismissed. However, an employee or officer who is implicated may be temporarily transferred to another department or workplace, if appropriate in the circumstances; and
- notifying the employee or officer implicated in a report of the outcome of any investigation.

## 8. Support

Lifeline Australia will take appropriate measures to support the wellbeing of and protection of a Whistleblower and/or persons implicated in a disclosure. This support may be in the form of:

- Lifeline Australia's Employee Assistance Provider, Benestar which is an employee confidential service, by contacting them on 1300 360 364 or [www.benestar.com](http://www.benestar.com);
- considering whether the Whistleblower can or should be allocated alternative duties;
- considering whether the Whistleblower can or should be permitted paid time off work;
- appointing an independent support person from the People and Culture Team to deal with any ongoing concerns;
- connecting the person with third party support provider such as Beyond Blue (1300 22 4636 or [www.beyondblue.org.au](http://www.beyondblue.org.au)); and/or
- Lifeline's crisis support services (call 13 11 14 or text 0477 13 1114, or chat) and support toolkit are also available at [www.lifeline.org.au](http://www.lifeline.org.au).

Use of these support services may require the Whistleblower to consent to disclosure of their identity or information that is likely to lead to the discovery of their identity.

## 9. Reports to other bodies

If a Whistleblower makes a 'protected disclosure' under the law that does not comply with this Policy, they may still be entitled to legal protections.

Disclosures can be made to ASIC or another Commonwealth body prescribed by regulation and qualify for protection under the Corporations Act.

A 'public interest disclosure' and 'emergency disclosure' can be made to a journalist or parliamentarian under certain circumstances and qualify for protection. A Whistleblower should contact an independent legal adviser before making a public interest disclosure or an emergency disclosure. It is important for a Whistleblower to understand the criteria for making a public interest or emergency disclosure. In particular:

- a disclosure must have previously been made to ASIC or a prescribed body and written notice provided to the body to which the disclosure was made; and
- at least 90 days must have passed since the previous disclosure.

## 10. Review and Availability of Policy

This Policy will be made available to employees via Lifeline Australia's Policy Repository.

This Policy will be reviewed annually to ensure relevant legislative changes are appropriately reflected within the Policy.

## 11. Roles and Responsibilities

### 11.1. Approval Authority

Lifeline Australia's Board is the approval authority for this Policy.

### 11.2. Governing Authority

The Governance & People Board Subcommittee is the governing authority for this Policy.

### **11.3. Policy Owner**

The Executive Director - People & Corporate Services (or equivalent position) is the policy owner. The policy owner is accountable for regularly reviewing and maintaining this Policy. The Policy is retained in the Lifeline Australia's Policy Repository.

## **12. Variations**

Lifeline Australia reserves the right to vary, replace or terminate this Policy at any time.

## Annex 1 to Whistleblower Policy: Whistleblower Report Form

Please provide the following details for any suspected serious misconduct or any breach or suspected breach of law or regulation that may adversely impact the Company. Please note that you may be called upon to assist in the investigation, if required.

Identifying details may be left blank if the whistleblower wishes to remain anonymous, however this may limit the scope/efficacy of any subsequent investigation.

*Note: Please review Lifeline Australia's Whistleblower Policy prior to filling out this report.*

WHISTLEBLOWER'S CONTACT INFORMATION	
NAME	
ROLE	
BUSINESS UNIT	
CONTACT NUMBER	
E-MAIL ADDRESS	
INFORMATION OF THE PERSON ASSOCIATED WITH THE SERIOUS BREACH	
NAME	
ROLE	
BUSINESS UNIT	
CONTACT NUMBER	
E-MAIL ADDRESS	
WITNESSES'S INFORMATION (if any)	
NAME	
ROLE	
BUSINESS UNIT	
CONTACT NUMBER	
E-MAIL ADDRESS	
<p><b>Complaint Information:</b></p> <p>Briefly describe the serious breach and how you know about it. Specify what, who, when, where and how. If there is more than one allegation, number each allegation and use as many pages as necessary.</p>	
1. What serious breach occurred? <i>Required to investigate</i>	
2. Who committed the serious breach? <i>Required to investigate</i>	
3. When did it happen and when did you notice it? <i>Required to investigate</i>	
4. Where did it happen? <i>Required to investigate</i>	

5. Is there any evidence that you could provide us? (If possible, attach the evidence to the email that you will send to the delegate)	
6. Are there any other parties involved other than those who have been identified above?	
7. Do you have any other details or information which would assist us in the investigation?	
8. Any other comments?	
Date:	Signature:

Once this report has been completed, please send it to one of the following addresses:

- Email: [whistleblower@lifeline.org.au](mailto:whistleblower@lifeline.org.au)  
 or upload: <https://www.kpmgfaircall.kpmg.com.au/Lifeline>  
 or via post: FairCall Manager  
 KPMG Forensics  
 PO Box H67  
 Australia Square  
 Sydney NSW 1213

**The whistleblower report will be acknowledged within 3 business days after being received.**