

# **WHISTLEBLOWER POLICY**

## **Introduction & Purpose**

The Melrina Group of companies (**Melrina**) is committed to the highest standards of conduct and ethical behaviour in all of our business activities and to promoting and supporting a culture of honest and ethical behaviour, corporate compliance, and good corporate governance.

Melrina encourages the reporting of any instances of suspected unethical, illegal, fraudulent, or undesirable conduct involving Melrina's businesses and/or operations and provides protections and measures so that those persons who make a report may do so confidentially and without fear of intimidation, disadvantage, or reprisal.

Melrina will adopt a consistent policy and in such other way as it will ensure the Whistleblower Policy (**Policy**) is available to Melrina's employees and other eligible whistleblowers wishing to use it.

## **Scope of the Whistleblower Policy**

### **Applicable entities**

This Policy applies to Melrina, which includes the following entities:

- Melrina Pty Ltd;
- Melrina Wholesale Meats Pty Ltd;
- Dick Stone Pty Ltd;
- Melrina Brisbane Pty Ltd;
- Melrina Melbourne Pty Ltd;
- Nano Bubble Technologies Pty Ltd; and
- Auswide Meat Wholesalers trading as The Morningside Meat Market.

### **Eligible Whistleblowers**

This Policy applies to all current and former:

- board members (officers) and employees of the Melrina Group;
- contractors (including the contractor's employees) of the Melrina Group;
- suppliers (including the supplier's employees) of the Melrina Group; and
- labour hire staff employed by an entity within the Melrina Group,

including a relative, spouse and/or dependent of an individual mentioned in the bullet points above,

(Collectively referred to in this Policy as an "**Eligible Whistleblower**").

## **Making a Protected (Whistleblower) Disclosure**

### **What is Reportable Contact?**

An Eligible Whistleblower may make a report under this policy if they have reasonable grounds to suspect that a Melrina director, employee, contractor, supplier, or other person who has business dealings with Melrina has engaged in conduct which:

- (a) is dishonest, fraudulent, or corrupt, including bribery or other activity in breach of the Melrina Anti-bribery Policy;
- (b) is illegal activity (such as theft, violence, harassment or intimidation, criminal damage to property, breach of competition and consumer law, breach of privacy law or other breaches of state or federal law);
- (c) is unethical or in breach of Melrina's policies (such as dishonestly altering company records or data, adopting questionable accounting practices or wilfully (in certain circumstances) breaching Melrina's Code of Conduct or other policies or procedures);
- (d) is potentially damaging to Melrina, a Melrina employee or a third party, such as unsafe work practices, environmental damage, health risks or abuse of Melrina's property or resources; amounts to an abuse of authority and/or a conflict of interest;

- (e) may cause financial loss to Melrina or damage its reputation or be otherwise detrimental to Melrina's interests;
- (f) involves harassment, discrimination, victimisation, or bullying, other than personal work-related grievances as defined in the Corporations Act; or
- (g) involves any other kind of misconduct or an improper state of affairs or circumstances,

(Collectively referred to in this Policy as “**Reportable Conduct**”).

Reportable Conduct does not include conduct solely relating to personal work-related grievances. Personal work-related grievances include but are not limited to interpersonal conflicts between a Melrina employee and another employee, work performance issues, or a decision relating to the engagement, and transfer or promotion of the employee. Conduct solely relating to a personal work-related grievance will be dealt with in terms of Melrina's Workplace Grievance Policy.

In limited circumstances, a personal work-related grievance may amount to Reportable Conduct under this Policy, such as where the grievance relates to conduct that has been taken against a person because they made a report under this Policy as an Eligible Whistleblower.

**Who can I make a report to?**

Melrina has several channels for making a report if you become aware of any issue or behaviour which you consider to be Reportable Contact:

**External Hotline Service Provider:**

All Eligible Whistleblowers can make a protected disclosure to Melrina's external and independent hotline provider, Grapevine, via any of the following means:

Reporting Channels	
Hotline Phone Number:	1300 933 977
Mail (postal address):	<b>PO Box 119 Carlton South, VIC, 3053.</b>
Weblink to reporting form:	<a href="https://melrina.grapevineonline.com.au/">https://melrina.grapevineonline.com.au/</a>

**Melrina's Whistleblower Officers**

Should you not wish to make a report through Melrina's hotline provider, in the first instance an Eligible Whistleblower should make a report to one of Melrina's Whistleblower Officers, listed below:

**Whistleblower Protection Officer:**

Name: Ardiana Selimi

Position: National HR & WHS Manager

Phone: 02 9795 2414

Email: [hr@melrina.com.au](mailto:hr@melrina.com.au)

**Whistleblower Investigation Officer:**

Name: Mike Gregory

Position: Chief Financial Officer

Phone: 02 9795 2422

Email: [mgregory@melrina.com.au](mailto:mgregory@melrina.com.au)

**Melrina's Eligible Recipients**

An Eligible Whistleblower may also make a report about Reportable Conduct with an “officer” or “senior manager” of Melrina. These include the following individuals within Melrina:

- For Dick Stone Pty Ltd - the General Manager
- For Melrina Melbourne Pty Ltd – the General Manager

- For Melrina Brisbane- the General Manager;
- For Melrina Adelaide – the General Manager; and
- For Nano Bubble Technologies – the Chief Executive Officer.

In addition to the above, reports relating to any entity within Melrina can also be made to the Managing Director or Director of the Melrina Group.

### **External Eligible Recipients**

In addition to the above, a report about Reportable Conduct can also be made to:

- ASIC or APRA;
- a legal practitioner for the purposes of obtaining legal advice or representation in relation to Whistleblower Laws;
- an auditor or member of an audit team conducting an audit on Melrina; and/or
- an actuary of Melrina.

### **Disclosures to Politicians and Journalists**

A report of Reportable Conduct to a journalist or member of State or Federal Parliament will be protected by Whistleblower Laws only if it qualifies for the public interest requirements or emergency requirements outlined below.

#### **Public interest disclosures**

A report of Reportable Conduct to a member of State or Federal Parliament or journalist will be protected by Whistleblower Laws if all of the following requirements are satisfied:

- the Eligible Whistleblower has previously made a report pursuant to this Policy;
- at least 90 days have passed since the previous report was made;
- the Eligible Whistleblower does not have reasonable grounds to believe that action is being or has been taken to address the previous report;
- the Eligible Whistleblower has reasonable grounds to believe that making a further report of the information to a member of Parliament or journalist would be in the public interest;
- the Eligible Whistleblower has given Melrina written notification that identifies the previous report and states that the Eligible Whistleblower intends to make a public interest disclosure; and
- the extent of information disclosed is no greater than is necessary to inform the journalist or member of Parliament of the relevant misconduct or improper state of affairs.

#### **Emergency disclosures**

A report of Reportable Conduct to a journalist or member of State or Federal Parliament will be protected by Whistleblower Laws if all of the following requirements are satisfied:

- the Eligible Whistleblower has previously made a report of the information pursuant to this policy;
- the Eligible Whistleblower has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment;
- the Eligible Whistleblower has given Melrina written notification that identifies the previous disclosure and states that the Eligible Whistleblower intends to make an emergency disclosure; and
- the extent of information disclosed is no greater than is necessary to inform the journalist or member of Parliament of the substantial and imminent danger.

### **What happens when I make a report?**

When making a report under this Policy, an Eligible Whistleblower will be requested to provide as much information as possible about the issue being raised. Information such as dates, times, location, individuals involved, other witnesses, physical evidence (e.g., documents, images) and any other general information may be sought.

This information is important as it enables Melrina to properly assess the concerns being raised and decide on the most appropriate course of action to be taken.

### **Can anonymous reports be made?**

Any Eligible Whistleblower making a report under this Policy can choose to remain anonymous. The identity of the Eligible Whistleblower making a report and the information provided in the report will be kept confidential unless the person making the report consents to the disclosure of their identity and/or the information contained within their report.

In addition, Melrina may need to disclose the identity of the Eligible Whistleblower and/or the information in the report if Melrina has been compelled or permitted by Law, regulatory obligations, or broader external requirement.

It is important to remember that anonymous reports can, at times, be more difficult to investigate and if an Eligible Whistleblower chooses to remain completely anonymous and does not provide any contact information, Melrina may be unable to make contact with them to ask further questions about the report or provide any updates on the investigation.

### **Protections provided to Eligible Whistleblowers**

If an individual makes a report under this Policy, they will have their details, and the information they provide, treated in the strictest of confidence.

Melrina is committed to ensuring that a person speaking up (an Eligible Whistleblower) is provided support and protection from personal or financial disadvantage as a result of making a report as an Eligible Whistleblower.

All Eligible Whistleblowers are afforded protection and Melrina will not tolerate any form of detrimental action, victimisation or retaliation against any person who makes a protected report as an Eligible Whistleblower under this Policy or legislation.

If an Eligible Whistleblower believes that they have been subjected to some form of reprisal or detrimental action as a result of them speaking up and making a report as an Eligible Whistleblower, the first point of contact should be to notify the Whistleblower Officers referenced above.

### **Investigations following receipt of a report of Reportable Conduct**

#### **Assessment of Reportable Conduct**

Once a report has been received and assessed, Melrina will determine the appropriate action required. Examples of actions could include:

- the report is forwarded for an investigation to take place;
- the report is recorded for information purposes; or
- no further action is taken.

#### **Conducting an investigation into Reportable Conduct**

If a report submitted is recommended for information purposes or no further action, where practicable, an Eligible Whistleblower will be contacted and advised of the determination.

If a report submitted is recommended for an investigation to take place, an assessment will be made by the relevant Whistleblower Officer.

The report may thereafter be assigned to an appropriate investigator for further action and the investigation may be conducted by the Whistleblower Investigation Officer, an employee from Melrina nominated by the Whistleblower Investigation Officer or by an external investigator appointed by Melrina.

All investigations will be conducted in a manner that is fair, confidential, with due process, objective (without bias) and in a timely manner. This includes respecting the confidentiality of all parties involved in the investigation (including persons named in a report).

At the conclusion of an investigation, an Eligible Whistleblower may be informed of the outcome of the investigation by the Whistleblower Investigation Officer, or the Eligible Whistleblower be provided with feedback on the report.

#### **Protection of files and records**

All files and records created from an investigation will be retained securely.

Unauthorised release of information to someone not involved in the investigation (other than senior managers or directors who need to know to take appropriate action, or for corporate governance purposes) without an Eligible Whistleblower's consent may be considered a breach of this Policy.

Eligible Whistleblowers are assured that a release of information in breach of this Policy will be regarded as a serious matter and will be dealt with under Melrina's disciplinary procedures.

### **Obligations on Melrina employees**

#### **Duties of employees in relation to reportable conduct**

It is expected that employees of Melrina, who become aware of actual Reportable Conduct, or suspect, on reasonable grounds, potential cases of Reportable Conduct, will make a report under this Policy or under other applicable policies.

#### **Group reporting procedures**

Melrina and its Whistleblower Officers (as appropriate) will report to the board on the number and type of whistleblower reports annually, to enable Melrina to address any issues and trends at a business unit and/or Group level.

These reports will be made on a 'no names' basis, maintaining the confidentiality of matters raised under this Policy.

In regard to serious and/or material Reportable Conduct, this will be considered by the Whistleblower Officers for immediate referral to the Chairman of the Board.

### **Employee Assistance Program (EAP)**

When an Eligible Whistleblower makes a report under this Policy, the Whistleblower Protection Officer will be responsible for overseeing the protection of the Eligible Whistleblower. Any Eligible Whistleblower who experiences any issues as a result of their disclosure, should in the first instance contact the Whistleblower Protection Officer.

Any employee or contractor seeking general welfare support or counselling should contact Melrina's Employee Assistance Program (EAP).

Melrina offers any employee or contractor access to confidential support and counselling through its EAP.

This is a free and confidential service provided by an independent and external provider, Associated Employee Assistance Providers, who can be contacted on (02) 8007 7474.

### **Policy Amendment**

This Policy cannot be amended without approval of the Melrina Group Director. It will be reviewed from time to time to ensure that it remains effective and meets best practice standards and the need of the Melrina Group.

### **Distribution of Policy**

This policy will be made available to all current and future employees within the Melrina Group of Companies and will be published on the Melrina Group's various websites as communication to suppliers, customers, contractors, and other external parties.



# grapevine

## How to make an anonymous disclosure report:

Call: 1300 933 977

Online report at:

<https://melrina.grapevineonline.com.au/>

Mail to: PO Box 119 Carlton South, VIC 3053

Grapevine Whistleblower is an external independent service, providing you with a safe environment, for anonymously reporting public interest disclosures about our company.

Public interest disclosures may include:

- General criminal behaviour
- Fraud
- Bribery
- Corruption
- WHS breaches
- Failure to declare conflict of interest
- Any/all illegal behaviour

