

Whistleblower Policy

The Bradnam Group (**'the Group'**), which comprises Bradnam's Windows and Doors Pty Ltd, National Glass Pty Ltd, QLDPLAS Pty Ltd and National Aluminium Pty Ltd, is committed to the highest standards of legal, ethical and moral behaviour. We are committed to maintaining an environment in which any person who believes serious instances of wrongdoing are occurring is able to report these without fear of retaliatory action.

This policy complements normal reporting and communication channels within the Group and provides an alternative means of reporting alleged or suspected wrongdoing where the usual channels appear to have failed or are inappropriate.

1. SCOPE

- 1.1 This Policy applies to all employees of the Group as well as to suppliers, contractors, Board Members and any other person having dealings with the Group and any relative, dependent or spouse of the aforementioned.

2. PURPOSE

- 2.1 To encourage and support the reporting of reportable conduct by assuring whistleblowers that it is safe for them to do so.

3. DEFINITIONS

Reportable conduct – in the context of this Policy, reportable conduct is any action that could be considered illegal, fraudulent, damaging to the reputation of the Group or contrary to the Code of Conduct. These include, but are not limited to:

- unlawful conduct – this includes conduct or practices that are illegal or breach any law, regulation, code, guideline and other regulatory instruments, e.g. corruption or fraud;
- conduct that significantly breaches the terms of any contract by which the Group is bound;
- misleading or deceptive conduct, including improper or misleading accounting or financial reporting, either by, or affecting the Group;
- misuse of the Group funds or assets;
- conduct that jeopardises the health or safety of the public generally, personnel or of the environment in which they are working;
- wasteful conduct;
- an abuse of authority; and
- suppression or concealment of any information relating to any of the above types of actions.

Whistleblowing – Whistleblowing means the disclosure of information from a person who has reasonable grounds to suspect that the information they have concerns misconduct, or an improper state of affairs or circumstances in relation to the Group. This may include if that person has reasonable grounds to suspect that the information indicates that the Group, or an officer or employee of the Group has engaged in:

- conduct that constitutes an offence against, or contravention of any of the following:
 - the Corporations Act;

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- the ASIC Act;
- the Bankruptcy Act;
- the Financial Sector (Collection of Data) Act;
- the Insurance Act;
- the Life Insurance Act;
- the National Consumer Credit Protection Act; or
- the Superannuation Industry (Supervision) Act;
- conduct that constitutes an offence against any other Commonwealth law that is punishable by imprisonment for a period of 12 months or more; or
- conduct that represents a damage to the public or financial system.

This policy must not be used for trivial or vexatious matters and is strictly applicable to matters that satisfy the above definition. Any disclosure of information that concerns a Personal Work-Related Grievance of an employee is not a disclosable matter under this policy. Personal Work-Related Grievance must be dealt with through the companies Grievance Policy.

4. POLICY PRINCIPLES

The Group has adopted the following principles concerning their whistleblowing program:

- 4.1 The Group will support and protect whistleblowers who intend to, or who actually report Reportable Conduct, acts as a witness or participates in any way with respect to the report of improper conduct genuinely suspect that they have reasonable grounds to report conduct from reprisals that stem from making a disclosure;
- 4.2 The Group will conduct investigations in an objective, independent and confidential manner as detailed in clause 6 of this policy. Appropriate corrective action will be taken as warranted by the investigation;
- 4.3 The Group will not take any disciplinary action against a whistleblower where disclosure is unable to be substantiated or is found to be untrue when the disclosure was made with a genuine or reasonable belief regarding the reportable conduct;
- 4.4 The Group may pursue legal or disciplinary action against a whistleblower acting with malicious intent or who knowingly provides any part of false disclosure. In such circumstances, The Group may not extend protection or indemnify a whistleblower against reprisals (including but not limited to civil actions);
- 4.5 The Group will not prevent (whether through confidentiality agreement or otherwise) a prospective, current, or former company officer, employee or contractor (including professional service providers) in disclosing to a regulator.

5. POLICY REQUIREMENTS

The minimum standards required to meet the policy principles are set out below:

- 5.1 All disclosures are to be treated as being submitted on a confidential basis, subject to any regulatory or legislative requirements or where the reportable conduct involves a threat to life, property or may involve, or potentially involve, illegal activities;

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- 5.2 Disclosures may be made from anyone with a connection to any of the Group entities which include employees, contractors, consultants, suppliers, third-party providers, secondees, advisers, auditors and former employees;

Whistleblowers will be supported and protected. It is not permissible to terminate, demote, suspend, threaten, harass, discriminate against, damage the reputation, business or financial position of, or threaten any of these acts against a whistleblower. Any such retaliatory action or victimisation in reprisal for a report being made under this policy is an offence, and it will also be treated as serious misconduct and will result in disciplinary action, which may include dismissal or in the case of suppliers and contractors termination of contract; If after making a report you believe retaliatory action or victimisation has occurred or been threatened, you have the right to make a submission to the Internal or Group Appointed External Whistleblower Protection Officers to report this conduct.

You will not be subject to any civil, criminal, administrative liability, enforcement of any contractual or other remedy for making a disclosure under this policy. It should be noted, however, that if you have been involved in the wrongdoing that you are reporting, making a report will not necessarily shield you from the consequences of those actions. Your liability for your own conduct is not affected by reporting that conduct under this policy and the disclosure will not be admissible in any proceedings, except in respect of the falsity of the information. In some circumstances an admission may be a mitigating factor when considering disciplinary or other action.

- 5.3 The identity of whistleblowers who wish to remain anonymous must be omitted from all reports relating to the disclosure;
- 5.4 Investigations of reportable conduct are to be treated in a manner that is confidential, fair and reasonable;
- 5.5 All records relating to whistleblower disclosures are to be retained in secure storage for a minimum period of 7 (seven) years unless local requirements specify a more significant retention period. Access to the stored disclosures and investigation information will be permitted to authorised persons only. Unauthorised disclosure of information relating to a report, your identity or information from which your identity could be inferred will be regarded seriously and may result in disciplinary action, which may include termination of employment or contract.

6. WHISTLEBLOWING AND INVESTIGATION PROCESS

- 6.1 Disclosures of reportable conduct must be based on information that is directly known to the person making the disclosure. That person must have reasonable grounds to suspect the alleged conduct has occurred;
- 6.2 Reports may be made through to the following individual who has been appointed by the Group as the Internal Whistleblower Protection Officer:

Name: Petta Robertson
E-mail: petta.robertson@me.com
Phone: 0419 737 141

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The internal Whistleblower Protection Officer may appoint an external Whistleblower Protection Officer if it is deemed necessary due to the nature of the issue(s).

You may also report the information to any other Officer or Senior Manager of the company (hereafter referred to as “Eligible Recipient”), who will then refer the matter to the Whistleblower Protection Officer for further action under this policy. The Eligible Recipient will only disclose your identity to the Whistleblower Protection Officer with your consent. If you do not consent to the disclosure of your identity to the Whistleblower Protection Officer, the Eligible Recipient will correspond with the Whistleblower Protection Officer on your behalf throughout the investigation.

Alternatively, you may also report the information to an auditor or actuary of the company, ASIC or APRA.

A disclosure that relates to tax avoidance behaviour can also be reported directly to the ATO (Australian Taxation Office). Information is available on the [ATO website](http://www.ato.gov.au/general/gen/whistleblowers/) at www.ato.gov.au/general/gen/whistleblowers/

- 6.3 All reports are treated in confidence, and the option to remain anonymous is available, however it should be noted that in remaining anonymous it may be more difficult for the alleged wrongdoing to be fully investigated if further information cannot be sought from the whistleblower.
- 6.4 Disclosures received will be assessed as to whether further investigation is appropriate, and a decision will be made as to whether the investigation will be handled internally or externally;
- 6.5 The whistleblower will be informed of the Investigator’s appointment, and the Investigator will contact the whistleblower to acknowledge receipt of the disclosure and to establish a process, including expected timeframes, for reporting to the whistleblower on the progress of dealing with the disclosure. If a whistleblower wishes to remain anonymous, the whistleblower will be required to contact the Investigator to request an update;
- 6.6 The whistleblower will be contacted by a Group representative as soon as practicable, to discuss their welfare and to discuss a communication process, if required;
- 6.7 If it is determined that there is insufficient information or evidence to warrant further investigation, the whistleblower will be informed at the earliest possible opportunity. No other action will be taken;
- 6.8 Where a formal investigation is initiated, this will be a fair and independent process, without bias. Inquiries will be independent of the business unit in respect of which allegations have been made, the person who has made the disclosure, or any person who is the subject of the reportable conduct;
- 6.9 The Investigator or a Group representative will inform the whistleblower of the outcome of the investigation, where appropriate. A copy of this policy will be made available to the Investigator;
- 6.10 Individuals against whom a whistleblowing report is made or who are mentioned in a report will be treated fairly and supported through the assessment and investigation process. This will involve the investigation being handled as confidentially as possible and ensuring that the individual has the opportunity to respond to the allegations during the investigation process. Where investigations substantiate an allegation arising from the disclosure, the

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matter will be dealt with following established administrative or disciplinary procedures, which may result in disciplinary action, including termination of employment;

- 6.11 Any issues of a criminal nature will be reported to the police and, if appropriate, other appropriate regulatory authorities;
- 6.12 If a person who makes a disclosure considers that their disclosure has not been dealt with in accordance with this Policy, or that they have been subject to retaliation as a result of making the disclosure, the matter can be escalated internally through Senior Management. Management will determine the most appropriate course for handling the issue, which may include informal resolution options or a formal investigation.
- 6.13 If you have made a Whistleblowing disclosure under this policy that qualifies for protection under applicable laws, and 90 days has passed since you made the disclosure and you have reasonable grounds to believe that action is not being or has not been taken to address the matter and you have reasonable grounds to believe that further disclosure would be in the public interest or that the information concerns a substantial and imminent danger to the health or safety of one or more persons or the natural environment, you may make a Public Interest Disclosure.

Prior to making a Public Interest Disclosure you must notify the Group in writing, providing details of the previous disclosure and stating that you intend on making a Public Interest Disclosure.

7. REVIEW

- 7.1 This policy will form part of the induction information provided to all employees of the company. A copy of this policy will also be made available as part of the Company's Policy Framework, which is accessible to all employees, as well as on the Company website.
- 7.2 This Policy will be reviewed by the CEO and Board of Directors at least every three (3) years.