

Whistleblower Policy

Alcidion Group Limited
ACN 143 142 410

BOARD APPROVED

V01 24 October 2019

1 Purpose

- 1.1 Alcidion Group Limited (**Alcidion** or **Company**) 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.
- 1.2 The Company encourages the reporting of any instances of unethical, illegal, fraudulent or undesirable conduct involving the Company's businesses and will ensure that those persons who make a report shall do so without fear of intimidation, disadvantage or reprisal.

2 What is Reportable Conduct

- 2.1 You may make a report under this Whistleblower Policy (**Policy**) if you believe that a Company director, officer, employee, contractor, supplier, tenderer or other person who has business dealings with the Company has engaged in conduct (Reportable Conduct) which:
- is dishonest, fraudulent or corrupt activity, including bribery;
 - is illegal activity (such as theft, drug sale or use, violence, harassment or intimidation, criminal damage to property or other breaches of state or federal law);
 - is unethical or in breach of the Company's policies (such as dishonestly altering company records or data, adopting questionable accounting practices or wilfully breaching the Company's Code of Conduct or other policies or procedures);
 - is potentially damaging to the Company, a Company employee or a third party, such as unsafe work practices, environmental damage, health risks or abuse of the Company property or resources;
 - amounts to an abuse of authority;
 - may cause financial loss to the Company or damage its reputation or be otherwise detrimental to the Company's interests;
 - involves harassment, discrimination, victimisation or bullying; or
 - involves any other kind of serious impropriety.

3 Who can I make a report to?

- 3.1 Alcidion has a number of channels for making a report if a person becomes aware of any issue or behaviour which he or she considers to be Reportable Conduct:

(a) Alcidion employees or contractors working within an Alcidion team:

You may raise the matter with your immediate supervisor, manager or another senior supervisor within your division/business unit. A supervisor in receipt of a report must take the matter to a Protected Disclosure Officer or a senior executive within the division/business unit in accordance with the protocols regarding confidentiality set out in clause 5 below.

Alcidion employees or contractors working within an Alcidion team may also report directly to a Protected Disclosure Officer, as outlined below:

(b) Any person may make a report to any of the following Protected Disclosure Officers:

Melanie Leydin	Phone:	+61 (3) 9692 7222
Company Secretary	Email:	melanie@leydinfreyer.com.au
Address:		Level 4, 100 Albert Road, South Melbourne, Vic, 3205

Kate Quirke	Phone:	+61 3 9692 7222
Managing Director	Email:	kate.quirke@alcidion.com
Address:		Level 10, 9 Yarra Street South Yarra, Vic, 3141

4 Investigation of Reportable Conduct

- 4.1 Alcidion will investigate all matters reported under this Policy as soon as possible after the matter has been reported. A Protected Disclosure Officer may appoint a person to assist in the investigation of a matter raised. Where appropriate, the Company will provide feedback to the whistleblower regarding the investigation's progress and/or outcome (subject to considerations of the privacy of those against whom allegations are made).
- 4.2 The investigation will be conducted in an objective and fair manner, and otherwise as is reasonable and appropriate having regard to the nature of the Reportable Conduct and the circumstances.

5 Protection of Whistleblowers

- 5.1 Alcidion is committed to ensuring confidentiality in respect of all matters raised under this Policy, and that those who make a report in good faith are treated fairly and do not suffer any disadvantage.

(a) Protection of your identity and confidentiality

Subject to compliance with legal requirements, upon receiving a report under this Policy, the Company will not disclose any particulars that would suggest or reveal your identity as a whistleblower, without first obtaining your consent.

Any disclosure that you consent to will be disclosed on a strictly confidential basis.

(b) Protection of files and records

All files and records created from an investigation will be retained under strict security and 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 your consent as a whistleblower will be a breach of this Policy.

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 the Company's disciplinary procedures.

(c) Fairness

An Alcidion employee or contractor within an Alcidion team who is subjected to detrimental treatment as a result of making a report in good faith under this Policy should inform the Company Secretary immediately. If the matter is not remedied, it should be raised in accordance with clause 3 of this policy.

Detrimental treatment includes dismissal, demotion, harassment, discrimination, disciplinary action, bias, threats or other unfavourable treatment connected with making a report.

The Corporations Act 2001 (Cth) (Act) also provides special protection to disclosures about breaches of that Act, as long as certain conditions are met – refer to Annexure A for further details.

6 Duties in relation to Reportable Conduct

- 6.1 It is expected that employees or contractors of the Company who become aware of known, or potential cases of Reportable Conduct will make a report under this Policy or under other applicable policies.

7 Reporting Procedures

- 7.1 Protected Disclosure Officers will report to the Board on the number and type of whistleblower incident reports annually, to enable the Company to address any issues.
- 7.2 These reports will be made on a ‘no names’ basis, maintaining the confidentiality of matters raised under this Policy. The Board will receive copies of all whistleblower reports, and whistleblower reports from Protected Disclosure Officers (as appropriate). In addition, serious and/or material Reportable Conduct will be considered by the Protected Disclosure Officers for immediate referral to the Chairman of the Board.

8 Policy Review

- 8.1 This Policy cannot be amended without approval from the Company’s Board. This Policy will be reviewed from time to time to ensure that it remains effective and meets best practice standards and the needs of the Company.

9 Further assistance

- 9.1 Any questions regarding this Policy should be referred to a Protected Disclosure Officer in the first instance.

10 Approved and adopted

- 10.1 This Policy was approved and adopted by the Board on 24 October 2019.