



Whistleblower Policy



1. Introduction

GreenCollar is committed to the highest standards of conduct and ethical behaviour in all business activities, including providing a safe working environment for its employees, and to promoting and supporting a culture of honest and ethical behaviour, corporate compliance and good corporate governance.

GreenCollar encourages an environment where misconduct and serious wrongdoing that occurs as part of its operations is reported and the person reporting such conduct is protected against retaliation, victimisation, harassment or discriminatory treatment.

2. Scope

This Policy applies to:

- anyone who is employed by or works at GreenCollar, including board members, executives, employees, contractors under direct supervision and temporary staff of GreenCollar and its related bodies corporate (**GreenCollar Staff**),
- any individual who works with or has a commercial relationship supplying goods or services to GreenCollar (or employee of such an individual), such as a landholder, supplier, contractor or a member of the local indigenous community, and
- a spouse or relative of any such individual,

who wishes to report a concern or issue involving any suspected misconduct or serious wrongdoing by GreenCollar or its staff.

This Policy applies to any matter which is related to GreenCollar's business and does not relate to private acts of an individual that are not connected to the business of GreenCollar.

This Policy is available on GreenCollar's website.

3. Key Concepts

Who is a whistleblower?

A whistleblower under this Policy is any individual who makes, attempts to make, or expresses a desire to make a report regarding a practice or an action at GreenCollar that they reasonably believe constitutes misconduct or serious wrongdoing (**Disclosable Matter**).

What is a Disclosable Matter?

A Disclosable Matter arises if an individual has reasonable grounds to suspect that misconduct or serious wrongdoing has occurred in relation to GreenCollar's business. This includes fraud, breaches of the law and engaging in an improper state of affairs.

What is not a Disclosable Matter?

Personal work-related grievances are not considered Disclosable Matters and are not protected under this Policy or Whistleblower legislation. These include interpersonal conflicts between employees, decisions related to suspension or termination of engagement, or dissatisfaction with terms and conditions of engagement, pay or promotion that do not involve any breach of workplace laws such as discrimination.

What process will be followed for reports?

This Policy includes the following attachments that provide information on the processes that are to be followed for reports made under this Policy:

Attachment 1: Whistleblower Information Sheet	Contains further details on who is a whistleblower, what is a disclosable matter, the statutory requirements, protections and the procedures that apply to whistleblower reports under this Policy that are also protected disclosures under the Corporations Act.
Attachment 2: Making a report flowchart	Provides a high level overview of the process for the making and handling of a report on suspected misconduct or serious wrongdoing, noting that this Policy only applies to matters related to GreenCollar operations and does not relate to the private acts of an individual unconnected to GreenCollar.

4. Objectives

The objectives of this Whistleblower Policy are to:

- Outline the options available to report suspected misconduct or serious wrongdoing both internally and externally.
- Outline the procedure that GreenCollar will follow for all reports of suspected misconduct or serious wrongdoing.
- Encourage whistleblowers to feel confident about reporting by ensuring that there are appropriate mechanisms in place to maintain objectivity, confidentiality and independence.
- Outline the measures in place to protect whistleblowers against reprisal or adverse action.

5. Key Requirements

The key requirements of the framework established under this Policy are as follows:

- Establishment and maintenance of a channel for reports to be made directly to a Whistleblower Protections Officer or an externally managed disclosure service (Disclosure Service Provider) engaged as a separate independent means of reporting by anyone to whom this Policy applies.
- Communication of the various options available to potential whistleblowers to make a report, and that a report can be made confidentially and anonymously. Regardless of the reporting channel, the whistleblower can choose to remain anonymous throughout the process.
- Assessment of all reports for review and/or investigation.
- Establishment of a process for all reviews or investigations to be conducted confidentially and in a timely manner.
- Establishment and maintenance of protections so that a person will not be subject to any retaliation by reason of having made a report. This may include minimising access to reports to ensure confidentiality, assessing whether anyone may have a motive to cause detriment and taking reasonable action to protect the whistleblower from that detriment.
- Having processes to ensure any review or investigation is fair and objective to all parties involved, and any person who is the subject of the report is informed at an appropriate time and afforded procedural fairness.
- Regular communication with the whistleblower to ensure they are kept informed to the extent practicable.
- The provision of regular reporting by the Compliance Team to the Audit and Risk Committee on whether any reports have been received under this Policy and summarising activities undertaken with respect to any such report.

- Escalation pathway to the Audit and Risk Committee for high risk or significant matters and direct escalation for any reports where a member of the Executive Leadership Team is the subject of the report.

6. Roles and Accountabilities

Role	Accountabilities
GreenCollar Staff	<ul style="list-style-type: none"> - Awareness of the GreenCollar Whistleblower Policy. - Identifying and reporting any misconduct, unethical behaviour, or policy breaches in a timely manner. - Seeking guidance from the Compliance Team regarding whistleblower processes. - Making reports in accordance with the Whistleblower Policy.
Whistleblower Protections Officer / Disclosure Service Provider	<ul style="list-style-type: none"> - Receiving and conducting initial review of the whistleblower report to ensure all relevant information has been provided. - Providing the report to a Whistleblower Investigations Officer. - Ensuring whistleblower protections are maintained. - Keeping whistleblowers updated on the status of their report. - Ensuring confidentiality is maintained throughout the process.
Whistleblower Investigations Officer	<ul style="list-style-type: none"> - Conducting or coordinating independent review and/or investigations into the disclosures. - Ensuring compliance with legal and regulatory requirements during the investigation. - Issuing final reports into findings, including any recommendations on corrective actions. If a member of the Executive Leadership Team is the subject of the whistleblower report, the final report is to be issued directly to the Audit and Risk Committee for action (rather than the Executive Leadership Team).
Compliance Team	<ul style="list-style-type: none"> - Responsibility for implementing corrective measures as directed by the GreenCollar Executive Leadership Team arising out of final reports. - Overseeing the whistleblower management framework under this Policy. - Annual review of the Policy to ensure effectiveness and compliance with laws. - Providing compliance advice on whistleblower matters generally. - Establish and maintain a register of whistleblower reports and any actions taken in response. - Regular reporting to the Audit and Risk Committee on any reports received under this Policy and summarising activities undertaken with respect to any such report.
Executive Leadership Team	<ul style="list-style-type: none"> - Decision making on recommendations arising out of final reports - Escalating final reports containing high risk or significant whistleblower matters to the Audit and Risk Committee for review and input on the response, noting that if a member of the Executive Leadership Team is the subject of the whistleblower report, the Whistleblower Investigations Officer will issue the final report directly to the Audit and Risk Committee for action instead of the Executive Leadership Team. - Addressing systemic issues arising from whistleblower disclosures.
Audit and Risk Committee	<ul style="list-style-type: none"> - Providing oversight on all whistleblower matters by receiving notification of any reports received under this Policy. - Providing input on the responses to: <ul style="list-style-type: none"> - all high risk or significant whistleblower matters; and - any whistleblower report where a member of the Executive Leadership Team is the subject of the report. - Reviewing and approving updates to this Policy.

7. Management Responsibilities

GreenCollar managers and executive leadership will be trained on this Policy and GreenCollar's prohibition against retaliation against whistleblowers acting in accordance with this Policy.

It is important that GreenCollar management be part of fostering a whistleblower culture which involves creating a positive and open environment so that GreenCollar Staff feel they can come forward to make a disclosure without fear of retribution.

8. Training and Awareness

All GreenCollar Staff will receive a copy of this policy, and it is available for access in GreenCollar's internal repository of policies and procedures.

In addition, GreenCollar will provide periodic training to make GreenCollar Staff aware of the process for making and handling reports under this policy and the protections that are available to whistleblowers.

9. Review and amendments to this Policy

This Policy will be reviewed annually by the Compliance Team to ensure compliance with ASIC RG 270 and other regulatory requirements. GreenCollar may review and update this Policy at any other time as required to ensure effectiveness and compliance with laws.

10. Related documents

This policy should be read in conjunction with the following GreenCollar Policies:

- Code of Conduct
- Anti-Bribery, Corruption & Fraud Policy
- Incident Management Policy
- Conflicts of Interests Policy

11. External resources

- Regulatory Guide 270: Whistleblower policies (RG 270)
- Information Sheet 238: Whistleblower rights and protections (INFO 238)
- Information Sheet 239: How ASIC handles whistleblower reports (INFO 239)
- Lodge a Report of Misconduct to ASIC:
<https://compliance ASIC.gov.au/#/form/583b77dc397bbc319837ea2a/app/67d0de9b853b6e87f1f31f20>
- Information Sheet 153 How ASIC deals with reports of misconduct (INFO 153)
- Information Sheet 151 ASIC's approach to enforcement (INFO 151)

12. Breach of this Policy

Any breach of this Policy including:

- Deliberately making a false report,
- Retaliation in reprisal for a report regarding a Disclosable Matter made under this Policy, or
- Breach of any requirement to maintain confidentiality under this Policy,



will be taken extremely seriously and investigated promptly. If confirmed, a breach may be treated as misconduct and may result in disciplinary action such as dismissal or termination of employment.

Document History		
1.0	2020	Original policy
1.1	August 2025	Rewrite to reflect new policy template, introduction of external reporting service and updates to reflect regulatory and corporate requirements
2.0	September 2025	Approved by GreenCollar Board for implementation

Next scheduled review date: September 2026

Attachment 1: Whistleblower Information Sheet

1. Who is a Whistleblower?

A whistleblower under this Whistleblower Policy is any individual who makes, attempts to make, or expresses a desire to make a report regarding a practice or an action at GreenCollar that they reasonably believe constitutes misconduct or serious wrongdoing (**Disclosable Matter**). This can be done either anonymously or openly. A whistleblower may or may not be directly affected by the matter they wish to report.

It is noted that the whistleblower protection provisions under the Corporations Act (**Whistleblower legislation**) provide rights and protections to a broader range of persons under the statutory definition of 'Eligible Whistleblower', which covers most people with a connection to a company or organisation but also includes former employees or contractors who are or may have been in a position to observe or be affected by misconduct and may face reprisals for reporting it. These statutory protections also extend to the spouses and relatives of these people.

2. What is a Disclosable Matter?

A Disclosable Matter arises if an individual has reasonable grounds to suspect that misconduct or serious wrongdoing has occurred in relation to GreenCollar's business. This includes fraud, breaches of the law and engaging in an improper state of affairs.

Some examples of misconduct or serious wrongdoing which should be reported under this Policy are listed below:

Type of misconduct or serious wrongdoing	Examples
Dishonest or fraudulent activity	Fraudulent preparation of offsets reports under the <i>Carbon Credits (Carbon Farming Initiative) Act 2011</i> (Cth), bribery or money laundering
Unlawful, corrupt or irregular use of company funds or financial practices	Misuse or improper use of accounting, internal controls, falsifying audit results, tax-related misconduct
Contravention of legislation applicable to GreenCollar's operations and activities	Bullying, sexual harassment, unsafe work practices, breaches of health and safety laws and regulations, unlawful discrimination in the workplace
Deliberate breach of GreenCollar policies	Deliberate and/or repeated breaches of GreenCollar Code of Conduct or other internal policies

GreenCollar Staff are expected to report all such issues to uphold the company's culture of ethical behaviour.

3. Matters That Are Not Covered Under This Policy

Personal work-related grievances are not considered Disclosable Matters and are not protected under this Policy or Whistleblower legislation. A personal work-related grievance is a grievance regarding an individual's employment with GreenCollar that may have personal implications. These include interpersonal conflicts between employees, decisions related to suspension or termination of engagement, or dissatisfaction with terms

and conditions of engagement, pay or promotion that do not involve any breach of workplace laws such as discrimination.

However, while whistleblower protections are not available for a personal work-related grievance, other employment law protections may be available. Please contact Head of Human Resources, the [Fair Work Ombudsman](#) or [Fair Work Commission](#) for information about workplace rights and obligations.

Conduct of an individual in their personal capacity that is not connected to the business of GreenCollar is not a Disclosable Matter.

4. Report Handling Process

To qualify for protection under this Policy and Whistleblower legislation, the report must be made by an individual within the scope of this Policy regarding a Disclosable Matter to an '**Eligible Recipient**'.

Who can receive a report – Eligible Recipients

A report about a Disclosable Matter can be made to either:

- (a) A Whistleblower Protections Officer, or
- (b) The Disclosure Service Provider.

A **Whistleblower Protections Officer** is a member of GreenCollar Staff with responsibility for receiving reports, protecting Whistleblowers, and keeping the Whistleblower up to date on its progress and outcome.

The Whistleblower Protection Officers are the Head of Human Resources and the Senior Compliance Manager.

The **Disclosure Service Provider**, Stopline, is a specialist organisation independent of GreenCollar with staff trained in receiving reports from whistleblowers. Stopline has been authorised by GreenCollar to act under this Policy. Their details are set out below:

Phone: 1300 304 550

Email: makeareport@stopline.com.au

Web: <https://makeareport.stopline.com.au/portal/landing/greencollar>

Post: GreenCollar, c/o Stopline, PO Box 403, Diamond Creek VIC 3089

If any individual has a reasonable belief that GreenCollar or a member of GreenCollar Staff has engaged in an action or practice that constitutes a Disclosable Matter, they are expected to immediately report such information to a Whistleblower Protections Officer or the Disclosure Service Provider through the *Make a Report* Portal at <https://makeareport.stopline.com.au/portal/landing/greencollar>. Both are 'Eligible Recipients' as defined under the Corporations Act, meaning that any disclosures of a Disclosable Matter to them will be protected by law.

Other 'Eligible Recipients' under the Corporations Act include external entities and persons such as:

- the Australian Securities and Investments Commission (**ASIC**),
- the Australian Prudential Regulation Authority (**APRA**),
- a lawyer, for the purpose of obtaining legal advice or legal representation about whistleblower protections, and
- journalists and members of Commonwealth, state or territory parliaments (parliamentarians), under certain circumstances – please see provisions in the Corporations Act relating to public interest and emergency disclosures. It is recommended that independent legal advice be sought before making a

public interest or emergency disclosure to ensure the disclosure qualifies for protection under the Corporations Act.

Note that Australian tax law also contains specific whistleblower protections for reports about tax avoidance behaviour and other tax issues to the Australian Taxation Office (**ATO**).

Protections relating to the Whistleblower's identity

Whistleblowers can choose to make a disclosure anonymously. For example, they may do so because of concerns about their identity becoming known. If such concerns exist, they may prefer to adopt a pseudonym for the purposes of their disclosure (not their true name) – or to create an anonymous email address to submit their disclosure.

However, even if a Whistleblower chooses to disclose their identity, GreenCollar will strive to keep the identity of the Whistleblower confidential while conducting the review and/or investigation of the incident.

In all cases, GreenCollar will not disclose the Whistleblower's identity to any individuals implicated in the Disclosable Matter being reviewed and/or investigated.

It is the responsibility of the relevant Whistleblower Protections Officer or Disclosure Service Provider to ask whether the Whistleblower consents to their identity being disclosed to other persons involved in the review and/or investigation of the Disclosable Matter. The Whistleblower is under no obligation to provide his or her consent, but is encouraged to do so as it will best enable the review and/or investigation of the Disclosable Matter and appropriate action to be taken. Otherwise, it is possible that GreenCollar may not be able to fully review and/or investigate a Disclosable Matter due to a Whistleblower choosing to remain anonymous or refusing to give consent to GreenCollar disclosing their identity as part of the review and/or investigation.

Please note that GreenCollar may disclose information identifying the Whistleblower without their consent, such as their name, contact details and other identifying information, where required by law (for example, to a regulator or other authority) or a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to applicable laws.

What to include in a report

Whistleblowers are encouraged to provide a report in writing with as much detail as possible to ensure it can be fully and promptly reviewed and/or investigated. Whistleblowers should include as much information about "who, what, where, when, how and why?", as well as any other information that may assist with the review and/or investigation of the Disclosable Matter.

Note that whilst protection is provided to Whistleblowers under this Policy, deliberate false reports will not be tolerated.

How will the Disclosable Matter be reviewed and/or investigated?

Upon receipt of a report under this Policy, the Whistleblower Protections Officer or Disclosure Service Provider is to:

- conduct an initial review and follow up with the Whistleblower where necessary to ensure that all relevant information has been provided, and
- provide the report and all relevant information obtained from the Whistleblower (including relevant consents) to the **Whistleblower Investigations Officer**.

A **Whistleblower Investigations Officer** is a member of GreenCollar Staff with responsibility for conducting or coordinating a review and/or investigation into the Disclosable Matter. The Whistleblower Investigations Officer is the GreenCollar General Counsel.

GreenCollar is committed to taking all Disclosable Matters seriously, and as such all reports will be followed up promptly, reviewed and/or investigated in a timely manner. On occasion, there may be circumstances such as the complexity of the Disclosable Matter and other compelling reasons that may justify an extended period for the completion of the review and/or the investigation. Should that be the case, the Whistleblower will be kept updated by the relevant Whistleblower Protections Officer or Disclosure Service Provider who will determine with the Whistleblower Investigations Officer an appropriate time to provide that information so as to not compromise the effectiveness of the review and/or investigation.

The Whistleblower Protections Officer and Disclosure Service Provider are otherwise independent of the review and/or investigations process being conducted by the Whistleblower Investigations Officer.

The Whistleblower Investigations Officer will review and/or investigate the Disclosable Matter impartially, and without bias or prejudice against the Whistleblower or any other person involved in, or any witness to, the Disclosable Matter. The specific steps and methodology that will be taken to conduct review and/or the investigation will be determined on a case by case basis by taking into account factors such as:

- the nature of the Disclosable Matter;
- whether it relates to a potential breach of law;
- the potential consequence and/or exposure for GreenCollar;
- whether the alleged misconduct or serious wrongdoing is ongoing or not, and/or
- whether any technical, financial or legal advice may be required to support the review and/or investigation of the Disclosable Matter.

Depending on these factors, the Disclosable Matter will either be reviewed and/or investigated:

- by the Whistleblower Investigations Officer (with or without assistance from other GreenCollar Staff who are clear of any conflict), or
- by independent external specialists with coordination and oversight by the Whistleblower Investigations Officer, if it is of a particularly serious nature or requires specialist technical, financial or legal advice.

Individuals involved in the review and/ or investigation of a Disclosable Matter will not share any information relating to matter that is likely to lead to the Whistleblower's identification without his or her consent, unless:

- the Whistleblower has already given their consent to disclosing his or her identity to persons involved in the review and/or investigation, or
- it is necessary to pass on such information for the purposes of the review and/or investigating the Disclosable Matter in which case they will take all reasonable steps to reduce the risk that the Whistleblower will be identified as a result.

Review and/or Investigation Process

Depending on the methodology chosen, the review and/or investigation may involve examining evidence, such as relevant documents, records or data, to determine whether there is credible information indicating whether or not the Disclosable Matter has occurred. Interviews with relevant people may also be conducted to obtain relevant testimonial evidence.

All evidence and records of the review and/or investigation, including any final report by the Whistleblower Investigations Officer or external specialists containing their findings upon conclusion of the review and/or investigation (**Final Report**), will be kept in accordance with the law and consistent with the need for confidentiality.

Recommendations on corrective actions may be identified following the review and/or investigation of the Disclosable Matter. This may include changes to processes or controls or disciplinary action. These should be documented in the Final Report.

Upon the conclusion of the review and/or investigation, GreenCollar is not obliged to provide the Final Report to the Whistleblower or reopen the matter. The information which the Whistleblower receives at the end of the process will depend on the circumstances. There may be circumstances where it is not appropriate to provide full details of the outcome to the Whistleblower.

However, if the Whistleblower has good reason to believe that the review and/or investigation was not conducted properly, or new information becomes available that was not considered previously, the Whistleblower is entitled to make a new report under this Policy.

Fair treatment of GreenCollar Staff that are subject of a disclosure

GreenCollar is committed to ensuring the fair treatment of GreenCollar Staff who are mentioned in reports of Disclosable Matters, or to whom such disclosures relate. Fair treatment includes the opportunity to:

- be 'heard' and respond to allegations made against them before any adverse findings are determined, and
- the opportunity to have their responses fully considered as part of the review and/or investigation.

During any review and/or investigation into the report of a Disclosable Matter, GreenCollar will extend support and protection as required to GreenCollar Staff who are implicated in the report until such review and/or investigation has concluded and claims have been proven or dismissed. Any suspected adverse or detrimental treatment in this regard should be reported to a Whistleblowing Protections Officer or Disclosure Service Provider so that these matters may be addressed.

External communications and disclosures

GreenCollar acknowledges that at any time:

- Whistleblowers have the right to engage and communicate with their legal advisors in respect of their concerns, and
- nothing in this Policy operates to prevent a Whistleblower from reporting to and communicating with regulators and certain third parties who are Eligible Recipients in relation to a Disclosable Matter. However, GreenCollar aims to create an environment where the Whistleblower would feel comfortable and protected in reporting a Disclosable Matter in accordance with the process under this Policy.

5. Whistleblower Protections

Under the Corporations Act:

- it is against the law for a person to victimise or retaliate against a Whistleblower for reporting a Disclosable Matter, and
- a Whistleblower is protected from all civil, criminal or administrative liability in relation to the reporting of Disclosable Matter.

Retaliation is any actual or threatened detriment (whether the threat is express or implied, conditional or unconditional) which a whistleblower may suffer because they have, or propose to, report a Disclosable Matter. Examples of retaliation include any of the following:

- Termination of employment,

- Adverse impact to employment or contractual arrangement,
- Alteration of duties to his or her disadvantage,
- Discrimination between the Whistleblower and other individuals,
- Harassment or intimidation,
- Taking legal action against the Whistleblower,
- Harm or injury, including psychological harm,
- Damage to property, reputation, business or financial position, or
- Any other damage.

GreenCollar will not retaliate against a Whistleblower who chooses to make a report under this Policy because that person:

- a) has made a report to an Eligible Recipient in good faith in relation to a Disclosable Matter; or
- b) participates in good faith in any resulting review and/or investigation of the Disclosable Matter, or
- c) exercises his or her rights under any law or regulation to pursue a claim or take legal action to protect their legal rights.

GreenCollar will also not tolerate any retaliation against any such person, and at its discretion may take disciplinary action (up to and including termination) against any member of GreenCollar Staff who in management's assessment has engaged in retaliatory conduct in violation of this Policy. Anyone engaging in retaliation may also face potential external consequences under applicable legislation or regulations.

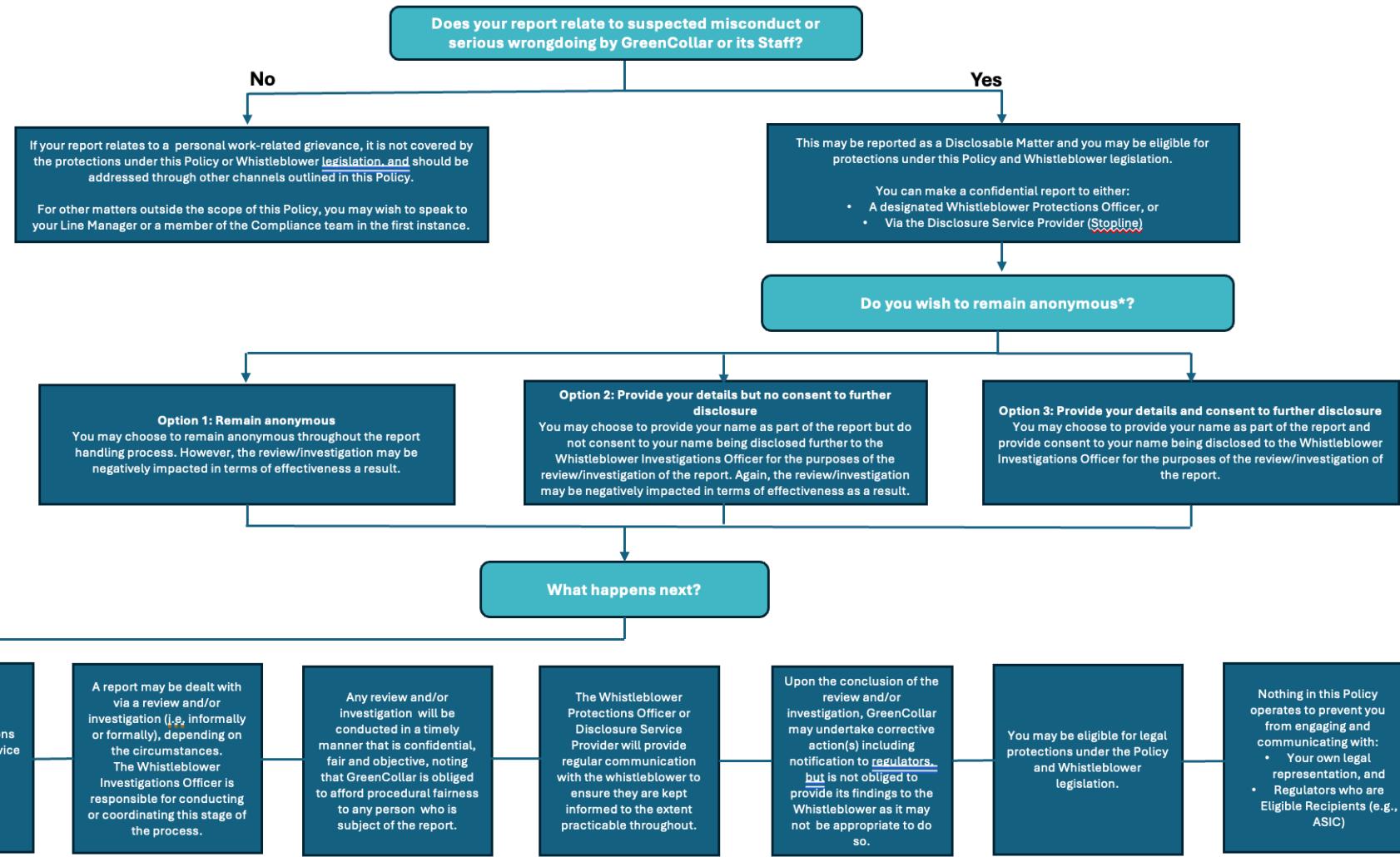
In addition, GreenCollar will not, with the intent to retaliate, take any action harmful to any Whistleblower who has provided to law enforcement personnel or a court truthful information relating to the commission or possible commission by GreenCollar or any member of GreenCollar Staff of a violation of any applicable law or regulation.

The protections under this Policy apply even if the Disclosable Matter is not substantiated, so long as the Whistleblower acted in good faith and did not knowingly make a false report.

Where the Whistleblower qualifies for protection under this Policy, the whistleblowing provisions of Corporations Act or any other law, the Whistleblower Protections Officer or Disclosure Service Provider is responsible for ensuring that this protection is provided.

Whistleblowers should also be aware that compensation and other remedies are available through the courts under the whistleblowing provisions of the Corporations Act in respect of loss, damage or injury suffered as a result of retaliation for reporting a Disclosable Matter. Whistleblowers are encouraged to either contact a regulatory body such as ASIC, APRA or the ATO and/or seek their own independent legal advice as GreenCollar cannot provide advice on such matters.

Attachment 2: Making a report flowchart



* Please note that GreenCollar may be required to disclose information identifying the Whistleblower without their consent where required by law (for example, to a regulator or other authority) or a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to applicable laws.