

DOB ENTERPRISES PTY LTD

DOB Whistle Blowing Policy
IMS-536-01-POL

Revision History

Date	Rev	Modified By	Changes Made, Review History	Reviewed by	Approved by
19.02.19	0	Sunette Opperman	Creation	S Rupert	S Rupert
21.10.21	1	Kimarie Meyers	Reportable conduct, process and protections	S Rupert	S Rupert



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DOB is committed to the highest standards of conduct and ethical behaviour in all our business activities and to promoting and supporting a culture of honest and ethical behaviour, compliance and good governance.

DOB encourages the reporting of any instances of suspected unethical, illegal, fraudulent or undesirable conduct involving DOB's businesses 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.

Reportable Conduct:

Reportable Conduct includes any past, present or likely future activity which:

- Is dishonest, corrupt or unethical
- Involves theft, fraud, money laundering or misappropriation of funds
- Is a systemic, willful or serious breach of the law as it relates to DOB, or its internal policies or processes
- Involves offering or accepting a bribe from any person
- Is illegal (e.g. illicit drug sale or use, violence or threatened violence and criminal property damage)
- Presents a significant or serious threat to the health and safety of workers
- Involves a serious mismanagement of DOB's resources
- Involves victimisation of someone for reporting a Reportable Conduct
- Involves any instruction to cover up or attempt to cover up serious wrongdoing
- Interferes with any impending internal or external audit processes
- Presents a serious risk to the reputation or financial wellbeing of DOB.

What is Not Reportable Conduct:

This Policy is not intended to apply to disclosures relating to conduct concerning a person's individual employment (other than as set out in Reportable Conduct) such as :

- personal, work-related grievances such as those relating to harassment, discrimination or disciplinary matters;
- alleged workplace discrimination or bullying;
- personal disputes between staff; or
- decisions regarding the engagement, transfer or promotion of staff.

These matters will not be deemed to be reportable conduct and will typically be investigated or addressed separately under the grievance, feedback and complaints management policy.

Reporting 'Reportable Conduct'

DOB encourages a culture of speaking up and coming forward if a person is aware, has knowledge of, or reasonably suspects, that someone has, or will, commit Reportable Conduct.

All reports can be made anonymously and still receive the protection provided under this Policy. However, when deciding whether to make a report anonymously, please be aware that anonymity may limit DOB's ability to investigate the matters reported. DOB encourages you to disclose your identity when making a report under this Policy, as this will also enable us to monitor your wellbeing and protect you from any retaliation or detriment.



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Reports and disclosures can be made verbally or in writing. They should include as much information as possible, including the details of the misconduct, people involved, dates, locations and any other evidence that exists.

A person making a report must not make a false or vexatious claim.

A report can be made to DOB by:

Phone: 1300 854 622

Email: feedback@mbcrecruitment.com.au

Online form: www.mbcrecruitment.com.au/contact/

Post: PO Box 1405, Port Macquarie NSW 2444 (marked to the attention of Director, IMSR or a Manager)

Reports can be made to report to:

- DOB Director, IMSR, or a DOB Manager;
- an auditor or a member of an audit team conducting an audit of DOB;
- ASIC, APRA or any other reportable government agency, law enforcement body or regulator in accordance with legislation
- a legal practitioner for the purposes of determining if the protections will apply.

Responding to Reportable Conduct

The manager will assess all reports that are received and will determine whether the matter falls under this Policy.

If the manager determines a report does not fall under or relate to Reportable Conduct, they will advise the person making the report and advise them of how the report will be handled

Investigating Reportable Conduct

A report made that is assessed as falling within this Policy will be investigated:

- The manager will determine whether the investigation will be conducted by an internal or external investigator, depending on the nature of the report.
- The investigator will conduct the investigation as soon as practicable and will ensure it is fair and independent from any persons to whom the disclosure relates.
- The investigator will conduct the investigation promptly, and in an objective and fair manner, ensuring that every individual subject to the investigation is granted sufficient opportunity to reply to allegations before any findings are made.
- Issues identified from the investigation will be resolved or otherwise finalised.
- The manager will inform you of the outcome of the investigation.
- The details of investigation and the outcome will be informed, on a confidential and anonymous basis.

Protections:

- DOB prohibits any actual or threatened personal detriment against a Whistleblower for disclosing or proposing to disclose a Reportable Matter in accordance with this policy or applicable legislation. This includes but is not limited to:
 - dismissal;
 - alteration of the Whistleblower's position or duties to their disadvantage;
 - discrimination;
 - harassment or intimidation; or
 - enforcement of a contractual right or remedy (e.g. under an employment contract).



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- Whistleblowers are also protected from the following in relation to their disclosure:
 - civil liability – including legal action for breach of a contract;
 - criminal liability – including prosecution for unlawfully releasing information; and
 - administrative liability – including disciplinary action for making the disclosure.
- Any detrimental conduct against a person reporting Reportable Conduct will be treated as a serious wrongdoing. These protections will apply even where it is subsequently determined that a report was mistakenly made or not substantiated.
- DOB understands that there may also be some serious repercussions for individuals who are mentioned in a report. Accordingly, DOB will ensure their fair treatment and will extend the protections stated above to these individuals where appropriate.
- If the Whistle Blower wishes to remain anonymous, DOB will take every step possible to accommodate this
- If a Whistle Blower's identity needs to be made known for an investigation to proceed, or it is not possible to maintain anonymity, DOB will discuss how to handle this with them
- A whistle blower is not expected to provide evidence of their concerns if they do not have evidence

Breach of Policy

Any potential breach of this policy will be investigated in accordance with DOB policies on workplace conduct.

Disciplinary action may be taken where a current employee is found to have breached any of their obligations under this policy and/or relevant legislation - including in relation to confidentiality or threats of retaliation against a Whistleblower.



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