



Whistleblower Policy

1. BACKGROUND

This policy supports the commitment of Peet in creating and maintaining a culture of proper conduct and fair and honest dealing in its business activities.

This policy should be read in conjunction with other Peet policies, including the Code of Conduct and Ethics, and the Equal Employment Opportunity Policy (Anti-discrimination, Harassment and Bullying).

This policy applies to all Employees who wish to report Improper Conduct in relation to Peet. It does not deal with staff grievances which are not Improper Conduct and for which separate procedures exist.

2. PURPOSE

The purpose of this policy is to:

- (a) maintain a working environment in which Employees are able to raise concerns regarding instances of Improper Conduct (where there are reasonable grounds to suspect such conduct) without fear of intimidation, disadvantage or reprisal;
- (b) outline the procedures for reporting and investigating reported matters; and
- (c) outline the measures in place to protect Whistleblowers.

Peet's Whistleblower Policy is governed by the Audit and Risk Management Committee, with day-to-day operation managed by the Group Company Secretary.

It is expected that Employees will report known, suspected or potential cases of Improper Conduct. Failure to raise issues could result in disciplinary action including termination of employment.

3. DEFINITIONS

In this Policy:

ASIC means the Australian Securities and Investments Commission.

Corporations Act means the *Corporations Act 2001* (Cth) as amended or modified from time to time.

Employee means any employee, director, contractor or consultant of Peet.

Improper Conduct means conduct that is illegal, unacceptable or undesirable, or the concealment of such conduct. It includes, but is not limited to, conduct that:

- (a) is against the law or is a failure by Peet to comply with any legal obligation;
- (b) is dishonest, fraudulent or corrupt;
- (c) is potentially damaging to Peet, an Employee or a third party, including unsafe work practices, environmental damage, health risks or substantial wasting of corporate resources;
- (d) is misleading or deceptive conduct of any kind, including questionable accounting or financial reporting practices;
- (e) involves bullying, harassment or discrimination; or
- (f) is unethical or breaches Peet's policies, protocols or codes of conduct.

Peet means Peet Limited and its subsidiary companies, syndicates and other managed entities.

Whistleblower means an Employee who alerts Peet and/or a regulatory authority to Improper Conduct within Peet.

Whistleblower Protection Officer means a person nominated by Peet whose key responsibilities include protecting Whistleblowers who report concerns under this policy. The current Whistleblower Protection Officers nominated by Peet are the Human Resources Manager, the Group Company Secretary and the Managing Director and CEO.

4. REPORTING PROCEDURE

Employees are encouraged to report Improper Conduct:

- (a) to their immediate manager; or
- (b) if the Employee is uncomfortable discussing, or unable to discuss, the matter with their manager, to a Whistleblower Protection Officer.

If an Employee wishes to remain anonymous, they may report Improper Conduct in writing to a Whistleblower Protection Officer or via a counsellor through the Company's Employee Assistance Program, who can report to Peet on the Employee's behalf.

Employees may report Improper Conduct to their immediate manager, a Whistleblower Protection Officer or the Company's Employee Assistance Program by:

- (a) post to c/- Level 7, 200 St Georges Terrace Perth WA 6000 (marked as private and confidential to the attention of the Employee's immediate manager or one of the Whistleblower Protection Officer); or
- (b) email; or
- (c) telephone.

Details of the Company's Employee Assistance Program can be found within the HR section of Sharepoint.

Reports, whether made directly or anonymously, must be made in good faith, and individuals making a report must provide available supporting details and evidence.

An Improper Conduct report that is made anonymously may hinder the ability to fully investigate the matter and may prevent the Whistleblower from accessing additional protection at law.

All non-anonymous notifications of Improper Conduct will be acknowledged in writing to the Whistleblower within a reasonable time after notification.

5. CONFIDENTIALITY AND ANONYMITY

Improper Conduct reports, whether made directly or anonymously, will be kept confidential and details of the report, or the Whistleblower, will only be released to those necessarily involved in the investigation, unless the Whistleblower consents or Peet is obliged to do so by law.

6. WHAT PROTECTION IS AVAILABLE FOR EMPLOYEES WHO REPORT?

Peet will protect Whistleblowers from any form of retaliation including:

- (a) dismissal;
- (b) demotion;

- (c) any form of harassment;
- (d) discrimination; or
- (e) bias.

Employees found to have taken any reprisal action against a Whistleblower may face disciplinary action, including the possibility of termination of employment.

Corporations Act

Whistleblowers who report a breach of the Corporations Act, with reasonable grounds to suspect the breach and make the report in good faith, have the benefit of the protections available under the Corporations Act. The Whistleblower must identify themselves when making the report, as anonymous reports are not protected under the Corporations Act.

Malicious or false allegations

Unsubstantiated Improper Conduct reports that are made maliciously or falsely will be viewed as a serious disciplinary offence and may result in termination of employment.

Whistleblowers who are involved in Improper Conduct

Reporting Improper Conduct does not necessarily protect the Whistleblower from consequences where he or she is involved in the Improper Conduct.

7. INVESTIGATION PROCEDURE

Whether an investigation is required, and the investigation processes undertaken, will vary depending on the precise nature of the alleged Improper Conduct. Any investigation will be conducted in a manner that is fair and objective to all people involved.

The Whistleblower Protection Officers are responsible for investigating reports made under the Whistleblower Policy. The Whistleblower Protection Officers have access to independent financial, legal and operational advisors as required, and for serious matters, will be assisted by the Audit & Risk Management Committee and/or the Board of Peet.

Feedback will be provided to the Whistleblower, if appropriate, on the progress of the investigation.

8. AMENDMENT OF THIS POLICY

This policy can only be amended with the approval of the Audit & Risk Management Committee of Peet.

**BRENDAN GORE
MANAGING DIRECTOR AND CEO
PEET LIMITED**