



# SPEAK-UP (Whistleblowing) POLICY

## 1 Purpose

The **Speak-Up (Whistleblowing) Policy** formally sets out Forico’s commitment to conducting business with integrity and describes the process for individuals to confidentially raise concerns of misconduct without fear of retaliation.

The purpose of this Policy is to encourage reporting of misconduct that is of legitimate concern by providing convenient and safe reporting mechanisms and protection for individuals who make serious misconduct disclosures.

We will not tolerate corrupt, illegal or other undesirable conduct nor condone victimisation of anyone who intends to disclose or has disclosed misconduct.

## 2 Scope

The scope of this Policy is to:

- Encourage and allow persons to disclose misconduct;
- Ensure disclosures are properly and lawfully dealt with;
- Support and protect everyone involved in the disclosure from victimisation and retaliation; and
- Ensure the identity of those making a disclosure (Whistleblower) and the content of the disclosure are kept confidential.

Nothing in this Policy is intended to change or take away any other protections which may be available at law.

Under the Corporations Act 2001, section 1317A(2) all large proprietary companies such as Forico **MUST** have a Whistleblowing Policy.

In addition to legislative requirements, Forico believe that strong protections for whistleblowers supports good governance outcomes and are therefore in the interests of business, whistleblowers and the broader public.

Grievances made by competitors, customers or clients of Forico are not covered by this Policy or the whistleblowing legislation.

This Policy applies to all (past and present) Forico employees, directors, contractors, consultants, volunteers, work-experience students, suppliers, their relatives and dependents, collectively referred to as Disclosers.

Any person defined as a discloser above may make a disclosure under this Policy.

Every person to whom this Policy applies has a responsibility to:

- Remain alert to misconduct;
- Report known or suspected misconduct in accordance with this Policy;
- Act in a way that reduces, prevents or stops misconduct;

- Support (and not victimise) those who have made or intend to make a disclosure; and
- Ensure the identity of the Discloser and the person/s who is/are the subject of the disclosure are kept confidential (unless required to disclose under law).

### 3 Procedural Principles

#### 3.1 Organisational Commitment

Forico is committed to the highest standards of legal, ethical and moral behaviour. The organisation is committed to acting with integrity in the conduct of its operations, in accordance with the key values which underpin Forico’s Code of Conduct.

Having an organisation where Disclosers are confident in speaking up is essential to conducting business with integrity. This Speak-up (whistleblowing) Policy is designed to provide a framework to raise issues that are sensitive in nature and the Discloser does not wish to raise the issue during the normal course of business or has residual concerns after doing so.

Forico is therefore dedicated to maintaining an environment where any conduct that challenges the organisation’s values and integrity can be reported, investigated and resolved ethically without fear of retaliation or retribution.

Forico is committed to ensuring:

- Disclosers feel comfortable and confident reporting matters of actual or suspected illegal or unacceptable conduct through their direct Leader, Forico Leadership Team (FLT) or the People & Culture function;
- Support and protection are provided for whistleblowers who act honestly, reasonably and with genuine belief about the reportable conduct;
- Investigations are conducted in a fair, objective, independent and confidential manner;
- Appropriate corrective actions are implemented as warranted by the investigation;
- Disciplinary action will not be taken against a whistleblower where a 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;
- Legal or disciplinary action may be pursued against a whistleblower acting with malicious intent or who knowingly provides any part of a false disclosure; and
- A prospective, current, or former company officer, employee or contractor (including professional service providers) will not be prevented from making a disclosure to a regulator.

#### 3.2 What is Reportable Conduct or Misconduct?

Misconduct may include (*note the below list is not exhaustive, but provides examples*):

Serious breach/es of Forico’s Code of Conduct, Policies or Procedures
<ul style="list-style-type: none"> <li>• <b>Theft</b> – taking of property without permission i.e. fuel from site for the lawnmower, taking wood home for personal use, stationery supplies for the home office.</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Breach of legal or regulatory requirements</b> – failure to report a significant safety or environmental incident, failing to promote an employee due to pregnancy, knowingly paying below award wages.</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Dishonesty</b> – failure to report a regulatory violation; Manager aware of but fails to address a regulatory/Policy breach; and accepting a gift from a supplier without any declaration.</li> </ul>

<ul style="list-style-type: none"> <li>• <b>Bribery or corruption</b> – accepting a benefit in exchange for preferential treatment, misuse of power, fraud/embezzlement, sharing confidential company information with a competitor.</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Unreported conflicts of interest</b> – taking advantage of a situation, i.e. not declaring that you know an applicant that has applied for a role in your team, authorising payment to a friend/family member for goods or services, obtaining information or using company assets for personal advantage (including financial).</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Improper tendering or awarding of contracts</b> – not following delegation of authority, not ensuring a competitive process to ensure best value, awarding contracts based on personal preference/relationships not business requirements.</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Company records being falsified</b> – purchase order/credit card submitted with false information, incorrect odometer reading submitted for vehicle, forging signature on document, intentionally providing inaccurate dates/information.</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Loss of confidential information, intellectual property or misuse of information</b> – accessing information without authority i.e. using a colleague’s login to access secured information, removing/destroying information to conceal an issue or problematic incident, sharing a customer/supplier details list with an external party, copying or taking company documents into personal possession prior to exiting the business.</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Illegal/Unethical financial practices</b> – including fraud, money laundering or misappropriation of funds causing substantial financial or non-financial loss or detriment to Forico, ie. Tax avoidance, defrauding investors through inaccurate financial statements, diverting company funds to make personal purchases or gain.</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Substantial waste of company resources</b> – failure to reuse, recycle or repair assets.</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Unacceptable behaviour</b> – harassment, discrimination, bullying, victimisation, sexual harassment, violence or threatened violence, security or firearm violations.</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Illegal Activity</b> – any action or behaviour that is in breach of governing legislation.</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Detrimental action towards a Whistleblower</b> – engaging or threatening to engage in conduct against a person who has made a disclosure or is suspected to have made, or be planning to make, a disclosure.</li> </ul>

**Can I make a disclosure about a personal work-related grievance?**

Personal work-related grievances **are not** matters of misconduct which can be reported under this Policy and are not matters which provide specific whistleblower protections to the discloser under Australian law.

Personal work-related grievances relate to current or former employment and have implications for the discloser personally and have significant implications for the organisation, but do not relate to misconduct disclosable under this Policy.

Examples of personal work-related grievances include:

- An interpersonal conflict between the whistleblower and another employee;
- A decision that does not involve a breach of workplace laws;
- A decision relating to the engagement, transfer or promotion of the whistleblower;
- A decision relating to the terms and conditions of engagement of the whistleblower; and
- A decision to suspend or terminate the engagement of the whistleblower, or otherwise to discipline the whistleblower.

Personal work-related grievances should be internally raised using the **Forico Grievance / Complaint Handling Procedure** – see section 3.3 1. a) of this Policy for further information.



process. This may include introducing additional support for the whistleblower, such as a dedicated support person or counselling support (if required and consent provided from the whistleblower).

The WPO will determine the next steps of the investigation required to explore the allegations further and substantiate the information provided. This may involve an internal investigation or the engagement of an external investigative resource.

The WPO may engage a confidential Whistleblowing Review Committee, if necessary, to administer the investigation process. This Committee would consist of members of the Forico Leadership Team and Company Secretary who are not associated with the area of alleged misconduct.

## 2. Making a disclosure internally to Forico – External Parties

Forico values the input of parties external to the organisation, including contractors, consultants, volunteers, suppliers (past or present), their relatives and dependents. Forico welcomes the opportunity to resolve situations of misconduct or business practice that do not align with Forico's values.

Forico encourages individuals/external parties to make contact directly with their Forico Representative to discuss the issue of concern.

Contractors are urged to contact their Forico Representative, or alternatively follow the applicable grievance process as detailed in their Contract/Agreement. Forico is committed to ensuring these concerns are followed up and corrective actions determined as soon as is practicable.

If after reviewing the reporting channels above it is felt that the matter is of a sensitive or highly confidential nature, this Speak Up Policy allows an alternative mechanism to report and escalate the concern. by:

- Contacting the Whistleblower Protection Officer (WPO) as per b) above;
- Making a disclosure to independent service provider *Your Call*; and
- Disclosure to external authorities and entities

## 3. Making a disclosure to independent service provider

If an employee or party external to the organisation feels unable or uncomfortable reporting misconduct through the above internal disclosure methods (including the [Grievance / Complaint Handling Procedure](#) or the internal WPO) they may do so using Forico's external disclosure provider, **Your Call**.

### What is Your Call?

**Your Call** is Forico's external, confidential whistleblowing provider.



It is available for use when someone suspects or is aware of illegal, unsafe or inappropriate activity (misconduct) at work and they do not feel comfortable speaking with their direct Leader, Forico Leadership Team (FLT) leader, a member of the People and Culture team or the Whistleblower Protection Officer.

**Your Call** provides an avenue for employees and parties external to the organisation to report misconduct confidentially and anonymously. It enables Forico to effectively deal with reports from whistleblowers in a way that will protect their identity and security and facilitate secure storage of the information provided.

The **Your Call** service is not designed for use in emergencies such as imminent threats to personal health or safety, the environment or company assets. Emergencies should be

immediately reported to local authorities and senior management as per company policies and procedures.

The process for lodging a report through **Your Call** is explained in **section 3.4** of this Policy.

#### **4. Disclosure to external authorities and entities**

##### **a) Concerning misconduct under the Act**

If the misconduct relates to the Corporations Act 2001 Section 1317AA (1) you may make a disclosure to:

- ASIC – <https://compliance.asic.gov.au/#/form/583b77dc397bbc319837ea2a/app/5de48f4c8c212107b4c13f22>
- APRA – <https://www.apra.gov.au/become-a-whistleblower-and-make-a-public-interest-disclosure>
- A Commonwealth authority prescribed for the purposes of Section 1317AA (1)

##### **b) Taxation Administration Act**

A discloser may make a disclosure to the Australian Taxation Office (ATO) and qualify for whistleblower protection if the information they intend to supply indicates misconduct in relation to the tax affairs of the entity.

##### **c) Concerning disclosures made to legal practitioner**

If you make a disclosure to a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of Part 9.4 of the Act (which includes the whistleblower protections and confidentiality of a whistleblower's identity) the disclosure will be protected under the Act.

##### **d) Concerning public interest disclosures**

You may make a disclosure in the public interest to a member of the Parliament of the Commonwealth, the Parliament of a State or the legislature of a Territory or a journalist if:

1. You have previously made a disclosure of that misconduct, and
2. At least 90 days have passed since the previous disclosure was made; and
3. You do not have reasonable grounds to believe that action is being, or has been, taken to address the misconduct to which the previous disclosure related; and
4. You have reasonable grounds to believe that making a further disclosure of the misconduct would be in the public interest; and
5. After the end of the 90-day period you give the person to whom you made the previous disclosure a written notification that:
  - Includes enough information to identify the previous disclosure; and
  - State that you intend to make a public interest disclosure; and
6. The public interest disclosure is made to:
  - A member of the Parliament of the Commonwealth, the Parliament of a State or the legislature of a Territory; or
  - A journalist; and
7. The extent of the information disclosed in the public interest disclosure is no greater than is necessary to inform the recipient of the misconduct or the improper state of affairs or circumstances.

### e) Concerning emergency disclosures

You may also make an emergency disclosure to a member of the Parliament of the Commonwealth, the Parliament of a State or the legislature of a Territory or a journalist if:

1. You previously made a disclosure that qualifies for protection under the Act – Part 9.4 under subsection 1317AA(1); and
2. You have reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment; and
3. You give the body to which the previous disclosure was made a written notification that:
  - Includes sufficient information to identify the previous disclosure; and
  - State that you intend to make an emergency disclosure; and
4. The emergency disclosure is made to:
  - a member of the Parliament of the Commonwealth, the Parliament of a State or the legislature of a Territory; or
  - a journalist; and
5. The extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the recipient of the substantial and imminent danger.

### *Where can I get information and advice?*

If you need information or advice about making a disclosure or the support and protection available, you may discuss the matter in confidence with your direct Leader, Forico Leadership Team or a member of the People and Culture Team.

The Whistleblower Protection Office (WPO) is available to assist discuss confidentiality and protection requirements.

Please be aware in the event you do not formally make a disclosure, Forico may nevertheless be compelled to act on the information provided during the discussion if the information reasonably suggests misconduct has or may occur.

## 3.4 How do I lodge a report with Your Call?

**Your Call** operates under a Service Agreement with Forico and acts as the intermediary, providing the means for a whistleblower to retain anonymity. Disclosures received by **Your Call** are reported to Forico in accordance with this Policy.

**Your Call** also enables Forico to obtain further information if required and enables the whistleblower to receive updates.

This is done via the use of an online anonymous Message Board which the whistleblower will have access to after making a disclosure.

The Message Board allows the disclosing individual to:

- Communicate with **Your Call** and/or Forico without revealing their identity;
- Securely upload any relevant documentation and/or material they wish to provide;
- Receive updates; and
- Request support or report detrimental acts.

The Whistleblower can determine their preferred level of anonymity from the following:

- Remain completely anonymous to both **Your Call** and Forico;
- Identify themselves to **Your Call** only; or
- Identify themselves to both **Your Call** and Forico.

**Your Call** enables disclosures to be made anonymously and confidentially. Whilst we prefer whistleblowers to disclose their identity to facilitate an investigation, whistleblowers are not required to identify themselves and will not be named in any report to Forico unless they have consented to their identity being disclosed.

A confidential report may be submitted to **Your Call** through the following methods:

1. **Online** - Reports can be submitted via the internet 24/7 from anywhere in the world through **Your Call's** secure web intake form at <https://www.whistleblowing.com.au/>

The disclosing individual (whistleblower) will be required to enter a unique identifier code **FORICO** (all uppercase) for Forico. The individual has the opportunity to upload any relevant documentation and/or material they wish to provide.

The system will generate a unique confirmation number and prompt the whistleblower to create a password. The confirmation number and password will then allow the individual to return to the web site at a later date to follow up on the progress of the case or to provide additional information.

**Your Call does not track visitors to their web site. The reporting individual can choose to provide their name or remain anonymous.**

2. **Telephone Hotline – 1300 790 228** (9:00am – 12:00am Monday to Friday)

The Telephone Hotline is answered by a trained **Your Call** Disclosure Officer who will provide a written report of the disclosure to Forico. The whistleblower can choose to receive correspondence via phone after the initial report if they choose.

3. **Email** – this service is available 24/7

Individuals who choose to provide a report of potential or actual misconduct can disclose via the following email address:

**[forico@yourcall.com.au](mailto:forico@yourcall.com.au)**

### 3.5 What happens to the information provided to Your Call?

A **Your Call** disclosure officer will review the report provided and submit further questions to the whistleblower if further clarity is required. This will either occur via the online portal (message board) or phone if the whistleblower has confirmed this method of contact.

**Your Call** has strict protocols regarding the handling of confidential information which they can provide to Whistleblowers at the time of the disclosure.

### 3.6 Protections under the law

To qualify for protection as a whistleblower under the Act and to receive specific legal rights you must meet all three of the following requirements:

- You must be an eligible discloser (as defined in **Section –2 – Objectives**)
- Disclose reportable conduct subject to the personal work grievance exemptions (as defined in **Section 3.2 – What is reportable conduct or misconduct?**)
- Make the disclosure through an appropriate reporting channel and recipient (as defined above)



### 3.7 Do I have to disclose my identity?

There is no requirement for a whistleblower to identify themselves for a disclosure to qualify for protection under the Act. A discloser can:

- Choose to remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised, and
- Refuse to answer questions that they feel could reveal their identity at any time, including during follow-up conversations.

Forico encourages disclosers who wish to remain anonymous to maintain ongoing two-way communication with either **Your Call** or the Whistleblower Protection Officer (if authorised) to allow follow-up questions and/or feedback to be provided (as per authorised channels to protect identity).

### 3.8 Will my identity be treated confidentially?

The identity of the whistleblower may be kept anonymous if desired by the whistleblower. However, in certain circumstances, the law may require disclosure of the identity of the whistleblower in legal proceedings.

The whistleblower's identity will not be disclosed by **Your Call** or Forico unless:

- The whistleblower consents to disclosing their identity;
- The disclosure is required by law;
- It is necessary to prevent a serious threat to a person's health or safety; and
- It is reasonably necessary for investigating the issues raised in the disclosure.

Forico has in place the following measures and mechanisms for protecting the confidentiality of a discloser's identity:

#### 1. Reducing the risk of being identified from the information contained in a disclosure

- All personal information or reference to the discloser witnessing an event will be redacted;
- The discloser will be referred to in a gender-neutral context;
- Where possible, the discloser will be contacted to help identify certain aspects of their disclosure that could inadvertently identify them; and
- Disclosures will be handled and investigated by qualified staff.

#### 2. Secure record-keeping and information-sharing processes

- All paper and electronic documents and other materials relating to disclosures will be stored securely.
- Access to all information relating to a disclosure will be limited to those directly involved in managing and investigating the disclosure;
- Only a restricted number of people who are directly involved in handling and investigating a disclosure will be made aware of a discloser's identity (subject to the discloser's consent) or information that is likely to lead to the identification of the discloser;
- Communications and documents relating to the investigation of a disclosure will not be sent to an email address or to a printer that can be accessed by other staff; and
- Each person who is involved in handling and investigating a disclosure will be reminded about the confidentiality requirements, including that an unauthorised disclosure of a discloser's identity may be a criminal offence.

An unauthorised disclosure of the identity of a whistleblower, or information that is likely to lead to the identification of the whistleblower where the information was obtained because of the disclosure,

will be regarded as a disciplinary matter and will be dealt with in accordance with Forico's disciplinary procedures.

It is also an offence/contravention under the Act which carries serious penalties for individuals and companies. If you are a discloser of a reportable matter and your identity is revealed without your consent, you may also be eligible to claim compensation and remedies under the Act.

As a discloser you should be aware that in practice, people may be able to guess your identity if:

- you have previously mentioned to other people that you are considering making a disclosure;
- you are one of a very small number of people with access to the information; or
- your disclosure relates to information that you have previously been told privately and in confidence.

You can lodge a complaint if you believe a breach of your confidentiality as a discloser has occurred by contacting the Forico Whistleblower Protection Officer (see above) or to a Disclosure Officer at **Your Call**. You can also lodge a complaint with a regulator including ASIC, APRA or the ATO if you believe a breach of your confidentiality as a discloser has occurred.

Should the Whistleblower choose to have their identity disclosed, no details of the whistleblower's participation in this process will be included in their personnel file. Files created on whistleblower reports will be kept securely by Forico.

### 3.9 How is an investigation conducted?

Forico will investigate and record all concerns confidentially, fairly and objectively.

#### 1. Disclosure is received

The disclosure is not anticipated to include absolute proof of misconduct, however where possible it should include:

- the name, job title and workplace address of the person the subject of the disclosure;
- details of the misconduct including dates and places;
- names of anyone who may substantiate the disclosure;
- any other evidence that supports the disclosure such as email, documents, CCTV; and
- These details will assist us in deciding how best to deal with and resolve the disclosure.

#### 2. Review of the Disclosure

Necessary investigative actions are determined after consideration of the disclosure. The disclosure will be given prompt and serious attention.

The appointed individual receiving the disclosure (ie. Whistleblower Protection Officer or **Your Call** Disclosure Officer) will carefully assess and use the information provided in the disclosure to decide the best action to take, including whether an investigation is required and, if so, determine the appropriate investigation process, including:

- The nature and scope of the investigation;
- Who will conduct the investigation and whether that person should be external to our organisation;
- The nature of any technical, financial or legal advice that may be required; and
- A timeframe for the investigation (considering the level of risk).

#### 3. The Investigation of the Disclosure

Any investigation will be conducted in an objective, constructive, impartial, lawful and fair manner and otherwise as is reasonable according to the principles of natural justice and procedural

fairness having regard to the nature of the Reportable Conduct and the circumstances. All efforts will be made to meet investigation best practices. While any investigation is ongoing, measures will be taken to keep the details of any employee / party mentioned in a disclosure, in whatever capacity, secure.

The Investigator will:

- Gather information, material and documentation concerning the disclosure as quickly as possible. (This may involve taking steps to protect or preserve documents, materials and equipment);
- Focus on the substance of the disclosure and will not focus on the motives of the discloser;
- Not assume that disclosures about conduct or behaviour that appear to have had a personal impact on a discloser are somehow less serious;
- Keep information gathered in the investigation securely;  
*Unauthorized release of information to someone not involved in the investigation (other than in confidence to obtain professional advice, or to implement appropriate action, or if required by law) without the whistleblower’s consent may be considered a breach of this policy and will be dealt with under [Forico’s Disciplinary Procedure](#).*
- Take all reasonable steps to protect the identity of the Whistleblower;
- Complete the investigation and provide a report of their findings as soon as is reasonably practical; and
- All files and records created from the investigation will be securely retained for the duration of 5 years and extended for a further 5 years from a subsequent investigation.

**4. Investigator’s Report of the Disclosure**

At the conclusion of the investigation, the investigator will provide a written report to Forico’s Board or Chief Executive Officer and/or Whistleblower Protection Officer (if not the investigator) including:

- A finding of all relevant facts;
- Whether the disclosure is proven, not proven or otherwise; and
- Recommendation/s, timeframes, actions to be taken in respect of the findings.

Forico will use the report to determine the next steps action/s (if any) to be taken including disciplinary action as per the [Disciplinary Procedure](#).

The findings will be communicated to the relevant parties involved to the extent that it is legally permissible and appropriate to do so.

**Will the whistleblower be kept informed?**

Subject to privacy and confidentiality requirements the whistleblower will be kept informed of the following, to the extent that it is legally permissible and appropriate to do so:

- When the investigation process has begun;
- Relevant progress of the investigation; and
- The outcome of the investigation.

The whistleblower will not be provided with a copy of the Investigator’s report or be privy to confidential investigation documents, statements or the like.

**Avenues for Review**

A discloser may request a review of the investigation findings if the discloser is not satisfied with the outcome. The review will be conducted by an officer who was not involved in handling and



Examples of detrimental conduct, acts and omissions include but are not limited to:

- Dismissal of an employee;
- Alteration of an employee’s position or duties to his or her disadvantage;
- Harassment or intimidation of a person;
- Harm or injury to a person, including psychological harm; and
- Damage to a person’s reputation.

Examples of actions that are not detrimental conduct and omissions include but are not limited to:

- Administrative action that is reasonable for the purpose of protecting a discloser from detriment (e.g. moving a discloser who has made a disclosure about their immediate work area to another office to prevent them from detriment); and
- managing a discloser’s unsatisfactory work performance, if the action is in line with the entity’s performance management framework.

Forico has in place the following measures and mechanisms to protect disclosers from detriment:

- Processes for assessing the risk of detriment against a discloser and other persons which will commence as soon as possible after receiving a disclosure.
- Support services (including counselling or other professional or legal services) that are available to disclosers.
- Strategies to help a discloser minimise and manage stress, time or performance impacts, or other challenges resulting from the disclosure or its investigation.
- Actions for protecting a discloser from risk of detriment - for example, Forico may allow the discloser to perform their duties from another location, make other modifications to the discloser’s workplace or the way they perform their work duties, or reassign or relocate other staff involved in the disclosable matter.
- Processes for ensuring that management are aware of their responsibilities to maintain the confidentiality of a disclosure, address the risks of isolation or harassment, manage conflicts, and ensure fairness when managing the performance of, or taking other management action relating to, a discloser.
- Procedures on how a discloser can lodge a complaint if they have suffered detriment, and the actions we may take in response to such complaints (e.g. the complaint may be investigated as a separate matter by an officer who is not involved in dealing with disclosures and the investigation findings will be provided to the Board or Lead Team); and
- Interventions for protecting a discloser if detriment has already occurred – for example, Forico may investigate and address the detrimental conduct, such as by taking disciplinary action, allowing the discloser to take relevant leave, develop a career development plan for the discloser that includes new training and career opportunities etc.

Forico are committed to thoroughly investigating reports of detrimental acts. If proven, those who have victimised another will be subject to management action including disciplinary action up to dismissal. It is also an offence/contravention under the Act which carries serious penalties for individuals and companies.

If you are a discloser of a reportable matter and you suffer a detrimental act or detrimental acts, you may also be eligible to claim compensation and remedies under the Act. Nothing in this Policy is intended to change or take away any other protections which may be available at law.



- Forico Complaint and Dispute Resolution Procedure;
- Forico Conflict of Interest and Related Party Transaction Policy;
- Forico Disciplinary Procedure;
- Forico Grievance / Complaint Handling Procedure;
- Forico Privacy and Confidentiality Policy;
- Forico Supplier Code of Conduct; and
- Forico Work Health and Safety Policy

**Checked and Confirmed Compliance with Statutory Requirements**

<b>Authorisation:</b>	Board Approval <input checked="" type="checkbox"/> CEO Approval <input type="checkbox"/> Other <input type="checkbox"/>
<b>Name and Signature: Chief Executive Officer</b>	Name: Evangelista Albertini  Signature:  
<b>Date:</b>	21 February 2023
<b>Date to be Reviewed:</b>	February 2025

# Forico Speak Up Process – APPENDIX 1

