

WHISTLEBLOWER POLICY & PROCEDURE

TJW# POL-GOV16

1) General	
1.1 Rationale	The Junction Works is committed to upholding the highest standards of integrity, accountability and corporate compliance. This policy and procedure complement our Code of Conduct by outlining the ethical standards, values, and behaviours expected of all individuals associated with our organisation, particularly regarding participant and participant care, regulatory compliance and professional conduct.
1.2 Establishment and Maintenance	<ol style="list-style-type: none"> 1. All employees, volunteers, directors, suppliers and contractors must read and agree to this policy and procedure. 2. This document will be audited annually and updated as needed.
2) Policies	
2.1 Overview	<p>This policy and procedure is designed to provide a safe and confidential mechanism for reporting unethical, illegal, corrupt, fraudulent, or inappropriate conduct. The Junction Works ensures that individuals who raise concerns in good faith are protected, and their identity will be kept confidential unless required by law. We prioritise maintaining a safe and respectful workplace, encouraging all individuals to speak up without fear of victimisation, retaliation, or any form of personal disadvantage.</p> <p>This document establishes a secure reporting mechanism for eligible persons, providing whistleblowers with the assurance that their concerns about illegal, unethical, or improper conduct will be addressed in a safe, reliable, and confidential manner, as required under the <i>Corporations Act 2001 (Cth)</i> and other relevant legislation.</p>
2.2 Reportable Conduct	<p>The Junction Works encourages all individuals to report any witnessed or suspected unethical, fraudulent, illegal or undesirable conduct. Individuals making a disclosure can be assured that their information will be treated confidentially, and they will not face retaliation, disadvantage, or any form of detriment as a result of their disclosure, provide the report is made in good faith.</p> <p>All disclosures should be made by individuals acting with honest intent and a reasonable belief that the information being reported concerns wrongdoing. The following types of conduct may be disclosed under this policy and procedure, but are not limited to:</p> <ul style="list-style-type: none"> • Dishonest conduct

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	<ul style="list-style-type: none"> • Fraudulent activities • Corrupt practices • Illegal conduct, including but not limited to theft, drug sale/use, violence or threatened violence and criminal damage against property • Gross mismanagement, serious and substantial waste, or repeated breaches of administrative procedures • Breaches of Commonwealth or State legislation or local authority by-laws • Unethical breaches of The Junction Works' Code of Conduct • Other serious improper conduct or improper state of affairs • Unsafe work practices • Any other conduct which may cause financial or non-financial loss to The Junction Works or otherwise harm its interests
2.3 Whistleblower Protection	<p>Eligible persons who make a report of 'Reportable Conduct' under this policy and procedure are entitled to protections under the <i>Corporations Act 2001 (Cth)</i>. Reports unrelated to 'Reportable Conduct', such as work-related grievances, are not covered by these protections.</p> <p>The Junction Works is committed to supporting whistleblowers throughout the investigation process and beyond. No adverse action will be taken against a whistleblower who makes a report in good faith, regardless of whether the allegations are substantiated or not. However, disciplinary action, including termination, may be taken against individuals who knowingly make false, misleading, malicious, or vexatious allegations.</p> <p>While every effort will be made to protect the whistleblower's anonymity, there may be circumstances where confidentiality cannot be guaranteed. In such cases, the whistleblower will be fully informed. It may be necessary to share the details of the complaint with relevant parties, including other Junction Works personnel, external investigators, or law enforcement agencies.</p> <p>The Junction Works will take all reasonable measures to ensure the identity of the whistleblower is protected. Whistleblowers with concerns about their anonymity are encouraged to discuss this with the investigator.</p>
3) Procedure Breakdown	
3.1 How to make a report	<p>In the first instance, the Whistleblower is encouraged to follow normal reporting channels and discuss the matter with their supervisor/manager. Refer to the <i>Staff</i></p>

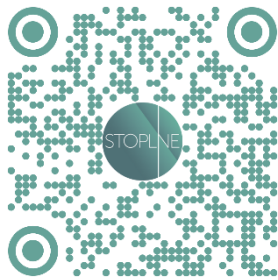
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	<p><i>Grievance Policy</i> for more information about other avenues available for resolving concerns or issues in the workplace.</p> <p>If the nature of the matter is such that it is not appropriate to report through normal channels, or if the Whistleblower has a reasonable concern about doing so, or if the matter has been previously reported under normal channels, but the Whistleblower believes no appropriate action has been taken, the Whistleblower contact the Whistleblower Protection Officer directly.</p>																		
3.2 Internal Reporting	<p>The Junction Works encourages all eligible persons to report any conduct that may fit with the terms above as soon as they become aware of it.</p> <p>Whistleblowers may raise concerns for issues with any of the following internal senior officers at The Junction Works via email, phone or in person as below:</p> <table><tr><th colspan="3">The Junction Works Whistleblower Protection Officers (WPO)</th></tr><tr><th>Name and position</th><th>Email</th><th>Phone</th></tr><tr><td>Jody Doualetas: Chief People Officer</td><td>jodyd@thejunctionworks.org</td><td>0404 871 732</td></tr><tr><td>Sarah Patterson: GM, People & Culture</td><td>sarahp@thejunctionworks.org</td><td>0438 949 417</td></tr></table> <p>In the event that any concerns relate to the People & Culture team, whistleblowers may raise their concerns with the Chief Executive Officer (contact details below) or the external reporting channel, Stopline – refer to section 2.2 for further details.</p> <table><tr><th>Name and position</th><th>Email</th><th>Phone</th></tr><tr><td>Terry Wilson: Chief Executive Officer</td><td>terryw@thejunctionworks.org</td><td>0432 691 538</td></tr></table>	The Junction Works Whistleblower Protection Officers (WPO)			Name and position	Email	Phone	Jody Doualetas: Chief People Officer	jodyd@thejunctionworks.org	0404 871 732	Sarah Patterson: GM, People & Culture	sarahp@thejunctionworks.org	0438 949 417	Name and position	Email	Phone	Terry Wilson: Chief Executive Officer	terryw@thejunctionworks.org	0432 691 538
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3.3 External Reporting	<p>If the matter is concerning a member of the Executive, to maintain independence from The Junction Works operations, any eligible person can report their concerns directly to StopLine via:</p> <p>Phone: 1300 30 45 50 Email: makeareport@stopline.com.au Or scan the QR Code below:</p>																		

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3.4 Investigation Procedure

All disclosures of reportable conduct will be thoroughly investigated by a Whistleblower Investigations Officer (WIO), who will be appointed by the Whistleblower Protection Officer (WPO). The WIO will act fairly and independently from the person making the report, the team involved, and the subject of the report.

1.1 Upon receiving information regarding suspected wrongdoing, the WPO or a qualified delegate (which may include an independent third-party investigator) will contact the whistleblower to confirm the details of the concern.

1.2 Based on the nature and severity of the allegations, the WPO will either investigate the matter themselves or appoint a WIO or third-party investigator. The choice of investigator is at the WPO's discretion.

1.3 The WPO will acknowledge the report in writing and keep the whistleblower informed of the investigation's progress, as reasonably possible.

1.4 If the investigation substantiates the allegations, disciplinary action may be taken against the person involved. In cases of serious misconduct, external bodies such as the NSW Police, ASIC, NDIS, or AHPRA may also be notified as appropriate. Whistleblowers will not face disciplinary action unless they knowingly make false or malicious claims.

In certain cases, such as suspected fraud, confidentiality may be maintained on a strict "need-to-know" basis until the investigation progresses.

1.5 If participant or employee safety is at risk, or the allegations are of a serious nature, the person under investigation may be suspended from duty while the investigation is ongoing. Suspension is a neutral act and should not be seen as an assumption of guilt.

1.6 Following the investigation, the WIO will prepare a report summarising the facts and findings (substantiated or unsubstantiated). This report will be provided to

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	<p>the WPO, who will take appropriate action, including notifying regulatory or enforcement agencies if necessary.</p> <p>1.7 The WPO will take all reasonable steps to protect whistleblowers from victimisation, harassment, or bullying.</p> <p>1.8 After the investigation concludes, the WPO will provide the whistleblower with a brief summary of the investigation's outcome and actions taken. Confidentiality may limit the specific details provided about any formal actions.</p>
Record Keeping	<ul style="list-style-type: none"> - StopLine - Sharepoint - People & Culture
Scope	<p>This policy and procedure applies to all current and former The Junction Works employees, volunteers, directors, suppliers, contractors (or their employees, subcontractors or family members) who have knowledge of or wish to report any suspected wrongdoing, unethical or improper behaviour related to the conducting of business of The Junction Works or its employees.</p> <p>This document does not apply to any personal work-related grievances which are dealt with under The Junction Works <i>Staff Grievance Policy</i>.</p>
Definitions	TJW - The Junction Works
Relevant Legislation	<ul style="list-style-type: none"> - Australian Standard (AS 8004-2003) (Whistleblower Protection Programs for Entities) - Corporations Act 2001 - The Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 - Taxation Administration Act 1953
Related Policy and Procedure	<ul style="list-style-type: none"> - Code of Conduct Policy - Staff Grievance Policy - Bullying and Harassment Policy - Fraud and Corruption Control Procedure - Risk Management Policy and Framework
TJW Forms	Complaints & Incident Report Form
Prepared by	Jody Doualetas - Chief People Officer