



# Whistleblower Policy (External)

Version 1.1  
April 2020

# Contents

Whistleblower Policy .....	3
Purpose .....	3
What is this policy for? .....	3
Application .....	3
Who does this Policy apply to? .....	3
Reportable Conduct .....	3
What matters should be reported? .....	3
How, who and when do you report? .....	4
What should you do? .....	4
Reporting anonymity .....	4
Protection for Whistleblowers .....	4
What is the protection? .....	4
Prohibition on Detrimental Treatment? .....	5
False or frivolous reports .....	5
There must be reasonable grounds to report .....	5
Investigations .....	5
Miscellaneous .....	6
Other .....	6
Review .....	6

# External Whistleblower Policy

## Purpose

### What is this policy for?

illion's External Whistleblower Policy has been put in place to ensure that all eligible Whistleblowers can raise concerns regarding **Reportable Conduct** which may amount to breaches of statutory or regulatory obligations, and that these can be raised without being subject to retribution, victimisation, harassment or discriminatory treatment.

This Policy will be published and accessible on illion's external website.

This Policy does *not* cover matters that are generally regarded as customer complaints or personal work-related grievances. Such issues should be reported to your relevant illion contact point to address the matter or via the on-line complaint [form](#).

## Application

### Who does this Policy apply to?

This policy applies to all past illion workers, including directors, officers, employees, past or current contractors, sub-contractors, service providers (such as consultants) and their employees, as well as their relatives and dependants (**Whistleblowers**).

Any Whistleblower may raise concerns regarding Reportable Conduct under this Policy.

## Reportable Conduct

### What matters should be reported?

Any matter which a Whistleblower suspects, on reasonable grounds, concerns misconduct or an improper state of affairs or circumstances in relation to illion or its related bodies corporate (or the conduct of their officers or employees), should be reported in accordance with this Policy (**Reportable Conduct**).

Examples of Reportable Conduct may involve:

- fraudulent activity
- unlawful, corrupt or inappropriate use of company funds or practices
- improper or misleading accounting or financial reporting practices
- a breach of any legislation relating to illion's operations or activities
- a significant risk to public safety
- tax avoidance behaviour and other taxation-related impropriety

## How, who and when do you report?

### What should you do?

A Whistleblower can report a matter 24/7 in the following ways:

- by sending an e-mail (identifiably or anonymously) to the following restricted e-mail address:  
[whistleblowing@illion.com.au](mailto:whistleblowing@illion.com.au)

The ability to report a matter is available to all Whistleblowers irrespective of which jurisdiction they may be located in.

A report must clearly set out the nature of the issue. Once received an Eligible Recipient will take such steps as are practicable in the circumstances to support the Whistleblower and ensure the Eligible Recipient understands the nature of the issue prior to having the matter investigated.

While reports can be made to external parties (such as ASIC / APRA / ATO / Journalists or Parliamentarians (where a public interest exists) etc), illion encourages any potential Whistleblower to use the internal process in the first instance. This will allow illion to receive and address matters promptly and provide reasonable assistance which may not be possible if the matter is referred externally.

### Reporting – anonymity

A report can be made anonymously - Eligible Recipients will keep the identity of a Whistleblower confidential (subject to applicable laws). Please note, however, it may be difficult for illion to properly investigate anonymous reports where additional information may be required.

If authorities take further legal action in relation to a reported matter, it may become necessary for a Whistleblower to identify themselves to those authorities.

Anonymous reporters will qualify for protection under the Corporations Act and illion will continue to take all reasonable steps to ensure that the Whistleblower is treated fairly and protected against detrimental treatment in their engagement with illion.

## Protection for Whistleblowers

### What is the protection?

Subject to compliance with legal requirements, upon receiving a report under this Policy and that qualifies for protection, our Eligible Recipients are legally prohibited from disclosing any particulars that might identify, or are likely to lead to the identification of, the individual reporting the conduct, without first obtaining the relevant individual's express consent. Unless required by law, any disclosure will be done on a strictly confidential basis. However, the Eligible Recipient is able to disclose the complaint without the discloser's consent to ASIC, APRA or the Australian Federal Police, to an Australian legal practitioner for the purposes of obtaining legal advice, or otherwise as permitted by law.

In addition, further protections are available to eligible persons who make eligible disclosures under this Policy (namely, protection against civil, administrative and criminal liability or the enforcement of certain contractual

remedies in respect of those disclosures). It may be advisable for a Whistleblower to seek independent legal advice.

## Prohibition on Detrimental Treatment

It is a priority for illion that individuals who make a report under this Policy that qualify for protection do not suffer detrimental treatment as a result of making that report. Detrimental treatment may include actual or threatened:

- dismissal, demotion, suspension or alteration of an employee's position within illion
- inappropriate changes to an individual's manner of engagement with illion
- discrimination against Whistleblowers
- damage to property, reputation or financial position
- harassment, intimidation, harm or injury

illion does not tolerate any form of detrimental treatment against any individuals who have made or assisted in the making/or investigation of a report under this Policy. Any such treatment must immediately be reported to illion to investigate and address.

## False or frivolous reports

### There must be reasonable grounds to report

A report may have serious consequences, including potential damage to the career prospects and reputation of people who are the subject of allegations of Reportable Conduct. Therefore, it is imperative that Whistleblowers who make a report under this Policy do so with reasonable grounds to suspect that the Reportable Conduct has, or will shortly, take place, and that all underlying information and facts concerning the Reportable Conduct are true and correct.

illion takes reports made under this Policy very seriously – it is important to note that the protections afforded a Whistleblower do not apply where a report is made falsely or is frivolous without having reasonable grounds to suspect that the Reportable Conduct has, or will shortly, take place.

## Investigations

illion will investigate all Reportable Conduct reported under this Policy as soon as practicable after the matter has been reported.

The investigation will be conducted expeditiously, in an objective and fair manner and otherwise as is reasonable and appropriate having regard to the nature of the Reportable Conduct and the circumstances. Whistleblowers are entitled to seek compensation and other remedies for loss, damage or injury suffered as a result of a disclosure or if illion has failed to take reasonable precautions and exercise due diligence to prevent the detrimental treatment from occurring.

## Miscellaneous

### Other

This Policy is not intended to restrict a potential Whistleblower discloser from providing information to, or communicating with a government agency, law enforcement body or a regulator (i.e. ASIC, APRA or the ATO in Australia), in accordance with any relevant law or regulations.

illion will take appropriate steps to ensure its employees are aware of and have access to its Whistleblower process.

### Review

This Policy will be reviewed annually to ensure that it remains effective and relevant to illion, and that it continues to comply with all relevant legislative requirements.