

Whistleblower Policy

Service Stream



Be accountable. You are safe to speak up.

Service Stream's vision is to be Australia's leading essential network service provider across transport, telecommunications and utilities industries. Our values of **Safety, Delivery, People and Accountability** are what we are accountable for at an individual, team and company level. We can't achieve our vision if we don't do the right thing. Our people must fulfil their responsibilities with honesty and integrity. We expect you to speak up if you reasonably suspect any illegal, unethical or improper conduct. This policy explains how to speak up as a protected whistleblower.

Whistleblowing at Service Stream

If you do or have in the past had a working relationship with Service Stream, or you are a spouse or dependant of someone who has or previously had such a working relationship, and you reasonably suspect misconduct or improper circumstances in connection with Service Stream, we encourage you to report it to us. We will protect you in line with this policy and the law. This policy details who can be a protected whistleblower, what situations you should report, how to report and how you will be protected.

How to make a whistleblower report

We have several channels that welcome whistleblower reports, so you can choose the method you're most comfortable with. These include **Stopline**, our external, confidential and independent reporting channel. Stopline can be contacted 24 hours per day, 7 days per week in these ways:

Phone	1300 30 45 50 (Australia)	
Online	https://servicestream.stoplinereport.com/	
Post	ServiceStream, c/o Stopline, PO Box 403, Diamond Creek VIC 3089 Australia	
Email	servicestream@stopline.com.au	
QR Codes		

Protection

Serious penalties can apply to anyone who breaches a whistleblower's confidence or retaliates against actual or suspected whistleblowers. This conduct is not tolerated by Service Stream.

Please read this policy for more information about protected whistleblowing.

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Our Whistleblower Policy on a Page



Read the full Whistleblower Policy for more information.

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1. PURPOSE AND SCOPE

1.1. Introduction

Service Stream is committed to maintaining a high standard of corporate governance through a culture of strong ethical behaviour and compliance. Our people must fulfil their responsibilities with honesty and integrity, and in line with our values. The purposes of this policy are to:

- encourage the reporting of misconduct, or illegal, unethical or other improper conduct;
- to provide options for the safe reporting of concerns; and
- explain how individuals will be protected in reporting these concerns.

The processes established under this policy are important tools in helping Service Stream uncover inappropriate conduct and wrongdoing that otherwise might not come to our attention.

1.2. Who does this policy apply to?

The expectations contained in this policy apply to all directors, officers and employees of Service Stream and anybody making a disclosure under this policy. These people are required to comply with any reasonable and lawful directions made by Service Stream in relation to this policy.

This policy is not intended to be contractually binding and does not form part of any employment contract with Service Stream. Service Stream may amend this policy at any time in its sole discretion.

1.3. Who can be a protected whistleblower?

When any of the following people disclose reportable conduct in accordance with this policy, they are a “**Whistleblower**” under the policy:

- all current and former Service Stream team members including;
 - employees and officers (including a director or company secretary);
 - consultants, secondees and volunteers; and
 - contractors, suppliers and their employees; and
- a relative, dependant or spouse of any of these people.

1.4. How do Whistleblowers access legal protections?

Service Stream does not tolerate victimisation or retaliation against any person who raises, may raise or is suspected to have raised any misconduct they reasonably suspect is occurring in relation to Service

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Stream's business, operations or people. In Australia, there is federal legislation that protects such a person from negative treatment. In the private sector, the main whistleblower protection laws are the *Corporations Act 2001* (Cth) and *Taxation Administration Act 1953* (Cth) (**Whistleblower Laws**).

To be protected under the Whistleblower Laws, disclosers, the concerns they are disclosing and the way they disclose those concerns must meet certain requirements. This policy is designed to help ensure the way you report relevant concerns meets these requirements. In summary, they are:

- the report must be made by a Whistleblower – noting you can stay anonymous if you wish;
- the report must be about Reportable Conduct (defined below); and
- the report must be disclosed using one of the reporting channels described in section 3 of this policy.

2. REPORTABLE CONDUCT

2.1. What is Reportable Conduct?

To access protection under this policy and the Whistleblower Laws, the information you disclose must be information you have reasonable grounds to suspect concerns Reportable Conduct. **Reportable Conduct** means misconduct or an improper state of affairs or circumstances in relation to Service Stream or any of its related bodies corporate. These are very broad concepts, and we can't provide a complete list of all such conduct. Examples of Reportable Conduct include information you have reasonable grounds to suspect concerns the following in relation to Service Stream entities, officers or employees:

- Dishonesty, fraud or corruption, negligence, bribery or corruption, breach of trust or duty, or abuse of authority;
- conduct that is illegal, including theft, drug sale or use, violence or criminal damage to property;
- an offence against or breach of particular federal laws such as the *Corporations Act 2001* (Cth), the *Australian Securities and Investments Commission Act 2001* (Cth), or conduct that is otherwise an offence against any Commonwealth law punishable by at least 12 months' jail;
- breach of Commonwealth or State / Territory legislation or local authority by-laws;
- material breach of Service Stream's Code of Conduct or other Service Stream policies;
- conduct that is potentially damaging to Service Stream, a Service Stream employee or a third party, or represents a danger to the public or the financial system, such as unsafe work practices, environmental damage, material health risks or substantial wasting of company resources;

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- any misconduct or improper state of affairs or circumstances concerning our tax affairs where this information might help someone with their relevant tax functions or duties; or
- victimising, harming or threatening any person (taking or threatening Detrimental Action as defined below) in connection with actual, potential or suspected whistleblowing.

2.2. Personal grievances may not be Reportable Conduct

Reportable Conduct does not include complaints relating to **personal work-related grievances**. These are matters that concern your current or former employment, and which tend to have implications for you personally and do not separately have significant implications for Service Stream. Generally, these will be concerns which relate to your individual working arrangements, such as:

- an interpersonal conflict between you and another team member;
- a decision relating to whether to engage, transfer or promote you;
- a decision about your terms and conditions of employment; and
- a decision to suspend or terminate your employment or to discipline you.

Personal work-related grievances are not protected disclosures and should be raised:

- if you are a Service Stream employee or officer - with Human Resources, by contacting PeopleDirect at <https://servicestrn.sharepoint.com/sites/People/SitePages/PeopleDirect.aspx>; or
- if you are a Service Stream contractor or consultant - with your Line Manager.

If you experience bullying, discrimination or harassment, we encourage you to raise a grievance directly with your people leader or report it through PeopleDirect. These grievances are protected from victimisation and adverse action under other workplace legislation.

This policy is not designed to replace normal communication between management and employees to address questions, concerns, suggestions or complaints in the ordinary course of business. In most instances, your immediate supervisor is in the best position to address general workplace issues, and serious or unresolved matters can be escalated through appropriate management channels.

However, if your concerns about any personal work-related grievances, including bullying or harassment, relate to actual or threatened detriment in connection with your actual, potential or perceived involvement in a whistleblower matter, or if the grievance has significant implications for Service Stream and otherwise meets the definition of Reportable Conduct, you should report it under this policy. If in doubt, blow the whistle.

Remember, you can raise whistleblower concerns anonymously, and still be eligible for protection.

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2.3. Other kinds of concerns

In addition to our PeopleDirect, Service Stream provides reporting channels for other matters that aren't eligible for whistleblower protection:

- To report a health and safety incident or hazard, please contact your supervisor immediately. If you are not a Service Stream employee, contact us at info@servicestream.com.au or phone: +61 3 9677 8888.
- For general complaints about Service Stream, please go to info@servicestream.com.au.

3. HOW TO MAKE A WHISTLEBLOWER REPORT

Disclosures of Reportable Conduct are only eligible for protection under this policy and the Whistleblower Laws if made to an authorised reporting channel described in this section. These include reporting directly to one of our authorised “eligible recipients” (including Stopline), and reporting directly to regulators or other external parties set out in section 3.3.

Service Stream seeks to identify and address potential wrongdoing as early as possible, and to encourage and maintain a culture where people feel safe and protected to speak up directly to us. Accordingly, we encourage you to report any suspected Reportable Conduct to Stopline or one of our internal eligible recipients in the first instance. These channels are set out in sections 3.1 and 3.2.

3.1. Stopline

Our preferred channel for protected disclosures is **Stopline**, our secure, external, confidential and independent reporting channel. Stopline can be contacted 24 hours per day, 7 days per week in these ways:

Phone	1300 30 45 50 (Australia)	
Online	https://servicestream.stoplinereport.com/	
Post	ServiceStream, c/o Stopline, PO Box 403, Diamond Creek VIC 3089 Australia	
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Stopline will direct disclosures to the Whistleblower Program (described below) by sending it to any member of the Whistleblower Program, or another person the Chairman of the Service Stream Board or Board Audit and Risk Committee appoints to be a member of the Program (for example, to deal with a conflict of interest).

This means that by making your report to Stopline, you consent to Stopline providing details of the report to members of the Whistleblower Program for purposes of this policy.

If you don't want Stopline to provide details of your report to a particular member of the Whistleblower Program, please state this when making your report.

Stopline will not disclose your identity to any person, including the Whistleblower Program, without your consent.

Stopline is a service specifically designed to facilitate confidential, and if you choose, anonymous, reporting. If you provide contact details to Stopline, you can remain anonymous while still communicating with the Program about your disclosure (e.g., to enable follow-up questions or to provide updates and feedback).

3.2. Other internal reporting channels

While we prefer that you disclose Reportable Conduct through Stopline, you can report your concerns using any of the other channels outlined in this section, and still be eligible for protection under this policy and the Whistleblowing Laws.

Report to Whistleblowing Program

You can report concerns about Reportable Conduct directly to our Whistleblower Program. The Program has been set up to implement our Whistleblower Framework, including managing disclosures made under this policy through any of our internal reporting channels. The membership of the Whistleblower Program may change at the discretion of the Chairman of the Board or Board Audit and Risk Committee, to ensure any perceived or actual conflicts of interests are effectively managed (i.e., by removing any conflicted individual from involvement in the handling of the disclosure).

The Whistleblower Program comprises one or more of the following people, each of whom is an "Eligible Recipient" of protected disclosures under the Whistleblower Laws and is trained on their responsibilities:

Program member	Contact details
Chris Chapman General Counsel & Company Secretary	Email: Chris.Chapman@servicestream.com.au
Sarah Bottomley Chief People Officer	Email: Sarah.Bottomley@servicestream.com.au
Ian McDonald General Manager Group Risk	Email: Ian.McDonald@servicestream.com.au

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When you disclose Reportable Conduct to any Program member, please clearly state that you are seeking protection under this policy. Don't report to a person who you think could be implicated in the matter.

Your identity will not be disclosed to any person unless you consent to this.

Report to Service Stream officers, senior managers and other “eligible recipients”

You may alternatively choose to make a disclosure about Reportable Conduct to any of the following, each of whom is an “eligible recipient” of protected disclosures under this policy and the Whistleblower Laws:

- a director or company secretary of any Service Stream company;
- any member of our Executive Management Team;
- auditors, or a member of our internal audit team conducting an audit, of Service Stream or a related body corporate; and
- if the disclosure relates to tax affairs, any other employee or officer who has functions or duties relating to our tax affairs, or a registered tax agent or BAS agent providing services to the entity.

The person you disclose to will then consult with the Whistleblower Program as to how your report will be addressed under this policy.

Your identity will not be disclosed to any person unless you consent to this.

3.3. External reporting options

Reports eligible for protection under the Whistleblower Laws may also be made to relevant regulators, including ASIC, APRA, or another regulatory body prescribed by the regulations. More information about whistleblowing at ASIC is available at: <https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/how-asic-handles-whistleblower-reports/>.

For Reportable Conduct in relation to tax, you can make protected disclosures to the Australian Taxation Office, the Commissioner of Taxation or to a registered tax agent providing services to Service Stream. More information about whistleblowing about tax is available at <https://www.ato.gov.au/general/gen/whistleblowers/>.

The Whistleblower Laws also protect disclosures made in the public interest and emergency disclosures to a journalist or a member of parliament in limited circumstances:

- for **public interest disclosures**, you must previously have made a whistleblower report about the matter to a relevant regulator (such as ASIC), at least 90 days must have passed, you must not have reasonable grounds to believe action is being or has been taken to address the matter and you must have reasonable grounds to believe making a further report would be in the public interest; and

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- for **emergency disclosures**, you must previously have made a whistleblower report about the matter to a relevant regulator (such as ASIC), and you must have reasonable grounds to believe the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the environment.

In both cases, you must also advise the regulator in writing that you intend to make the report to the journalist or member of parliament. We encourage you to seek independent legal advice before making any report to a journalist or member of parliament. Any disclosures you make to a lawyer for purposes of obtaining legal advice or representation about the operation of the Whistleblower Laws are also protected.

3.4. Reports made outside the authorised channels

Reports made to people or bodies not identified in section 3 as a reporting channel for protected disclosures are not eligible for protection as a whistleblower disclosure under this policy or the Whistleblower Laws.

If you are not an eligible recipient referred to in this section 3, and you receive a disclosure of Reportable Conduct from someone, you should explain to them that you are not an eligible recipient of protected disclosures, and encourage them to read this policy and make their report to one of the authorised reporting channels (preferably, Stoptline). You should be very cautious not to put the person's confidentiality at risk, and should contact the Whistleblower Program for guidance as soon as possible (being sure not to identify the person when you do so, without their consent). You must always keep the disclosure confidential, even if the discloser reports elsewhere and even after you refer the matter to the Whistleblower Program.

4. PROTECTIONS FOR WHISTLEBLOWERS

4.1. Protection from Detrimental Action

Service Stream takes protection of Whistleblowers extremely seriously. We take all reasonable steps to ensure that Whistleblowers can make reports under this policy without fearing retribution or victimisation.

A Whistleblower who discloses Reportable Conduct under this Policy must not be subjected to Detrimental Action. Detrimental Action must also not be taken or threatened against anyone because they are suspected to be a Whistleblower or to prevent them from becoming a Whistleblower, or because they are or are suspected to be otherwise associated with a whistleblowing matter. **Detrimental Action** includes:

- action causing injury or harm (including psychological harm);
- damaging a person's property, reputation, business or financial position or causing any other damage;
- intimidation, bullying or harassment;

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- discrimination or other adverse treatment in relation to the person's employment, career, profession, trade or business, including dismissal, demotion or the taking of other disciplinary action; and
- any conduct which threatens, or incites others, to subject a person to any of the above conduct.

Detrimental Action does not include reasonable administrative action, such as managing unsatisfactory work performance in line with our performance management framework.

Detrimental Action is a form of Reportable Conduct and should be reported through the reporting channels set out in this policy, and/or to a Whistleblower Protection Officer if one has been appointed to you.

4.2. Protection of confidentiality and anonymity

You can choose whether and the extent to which you would like to remain anonymous when disclosing Reportable Conduct under this policy. You can do this by, for example, naming in your report the people with whom you consent to share your identity and anyone you refuse to share your identity with. Even if you consent to sharing your identity in connection with your report, the Whistleblower Program will only share that information to the extent reasonably necessary to enable the Program to review and action your report and implement this policy, or as otherwise agreed with you.

Where your identity as a Whistleblower (or information likely to lead to your identification) is obtained by the Program in connection with a protected disclosure, it will be kept confidential, unless:

- you consent to this identifying information being disclosed;
- the information is disclosed to a lawyer for the purpose of obtaining legal advice or representation in relation to the operation of the Whistleblower Laws;
- Service Stream is required to disclose the information by law (for example, to an external regulator government agency or where we are ordered to do so by a court);
- the information is disclosed to ASIC, a member of the Australian Federal Police or APRA; or
- Service Stream needs to disclose the information to prevent or lessen a serious and imminent threat to the life, health or welfare of a person.

All other information provided by you as a Whistleblower will be treated as strictly confidential and maintained securely, with access limited to the Whistleblower Program and any other person the Program considers needs the information to implement this policy and our Whistleblower Framework, such as:

- members of the Whistleblower Program;
- a person engaged to assist with addressing your report or implementing this policy, such as professional advisors and appointed investigators (internal or external);
- a Whistleblower Protection Officer (if applicable);

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- persons involved in monitoring and/or overseeing this policy and the Whistleblower Framework; and
- as part of the information technology processes necessary to administer the Whistleblower Framework and this policy, and any third party hosting these records.

Any unauthorised disclosure of a Whistleblower's identifying information will be treated as a serious disciplinary matter. It is also an offence under the Whistleblower Laws attracting serious penalties including large fines and imprisonment.

Confidentiality, anonymity and investigations

For purposes of investigating a matter related to a protected disclosure, it may be reasonably necessary to disclose information that may lead to a Whistleblower being identified. This is permitted under the Whistleblower Laws and this policy, provided their identity itself is not disclosed and all reasonable steps are taken to reduce the risk that the Whistleblower will be identified as a result of the disclosure. These steps could include removing or masking information (such as details about the person's work area or gender).

It is your right to choose to remain anonymous when disclosing Reportable Conduct under this policy, and you remain eligible for protection as a Whistleblower if you remain anonymous. This also means you may refuse to answer questions you believe could reveal your identity, including during follow-up conversations.

Note that in practice, others may be able to guess your involvement in a whistleblowing disclosure if you have previously mentioned that you are considering making a report, or if you are one of a small number of people with access to that information.

If you do remain anonymous, this might mean our investigation into matters you disclose will be limited, and we may not be able to provide you with other support, such as a Whistleblower Protection Officer. Even if you initially choose to remain anonymous, you can change your mind at any time and disclose your identity later in the process, for example, to an investigator or a Whistleblower Protection Officer if one is proposed to be assigned to you.

4.3. Additional support and protections

In addition to confidentiality and protection from Detrimental Action, Service Stream provides further protection and support to Whistleblowers who disclose Reportable Conduct under this policy, such as:

- undertaking an assessment of risk, and ways to control or mitigate and monitor risk, that a person may be subjected to actual or threatened Detrimental Action;
- for Whistleblowers who are current employees, and others at the discretion of Service Stream, access to our Employee Assistance Program provider LifeWorks (accessible 24/7 by phone: **1300 361 008**) for confidential counselling support; and
- for Whistleblowers who are current employees, additional support options including the opportunity to take leave and other workplace assistance.

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Whistleblower Protection Officer (WPO)

Where appropriate, the Whistleblower Program may appoint a WPO to monitor the wellbeing of a Whistleblower, to assist them to understand the process and protections and to receive reports of actual or threatened Detrimental Action. It may not be possible to appoint a WPO to a Whistleblower who remains anonymous.

If a person believes on reasonable grounds that any person has been, or is likely to be, subjected to whistleblowing-related Detrimental Action, they should report this to Stopline or another eligible recipient, or to the WPO, who will liaise with the Whistleblower Program about appropriate next steps. A discloser may also seek independent legal advice or contact regulatory bodies such as ASIC or the ATO if they believe they have suffered Detrimental Action.

4.4. Do Whistleblowers get immunity?

Employees will not be subject to disciplinary action for making a disclosure of reasonably suspected Reportable Conduct under this policy. They may, however, be subject to disciplinary action for misconduct that is revealed as a result of the disclosure, although we will take the disclosure into account when determining disciplinary or other actions.

Under the Whistleblower Laws, if you make a disclosure that qualifies for protection, you:

- cannot be subject to any civil, criminal or administrative liability, for making the disclosure; and
- no contractual or other remedy can be enforced, or right exercised, against you (such as a contractual breach of confidentiality) on the basis of the disclosure.

You may still be subject to civil, criminal or administrative liability for conduct by you that is revealed by your disclosure. Service Stream cannot provide immunity from civil penalties or criminal prosecution. However, if the disclosure is made to ASIC, APRA or the Commissioner of Taxation, or is a public interest or emergency disclosure under the Whistleblower Laws, the information you disclose is not admissible in evidence against you in criminal proceedings, or in proceedings for the imposition of a penalty, except for proceedings in respect of providing false information.

4.5. False reports

To be eligible for protections under this policy and the Whistleblower Laws, you must have reasonable grounds to suspect the Reportable Conduct you disclose. If you make a disclosure based on reasonable grounds that – after investigation – turns out to be mistaken, you will still be protected.

You must not make a false report, which is a baseless report or a report where you knowingly provide false or misleading information. Doing so may result in disciplinary action up to and including termination of employment.

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5. WHAT HAPPENS WHEN I SPEAK UP?

Any reports made under this policy, including to Stopline, will be directed promptly to relevant member/s of the Whistleblower Program for assessment and action. The Whistleblower Program will assess whether the report includes matters that are Reportable Conduct, whether the discloser is a Whistleblower eligible for protection, and whether the report was disclosed through one of the required channels under this policy. When all three of these eligibility criteria are met, the report will be managed under this policy. If the eligibility criteria are not met, the Program will determine how best the matter is to be addressed, which may be under this policy or another resolution mechanism.

For eligible matters, the Program will use the information you provide in your disclosure to conduct a detriment risk assessment, and to decide what action to take, including whether an investigation is required, and if so, the investigation process and who will be appointed to investigate, which could be a person or entity internal or external to Service Stream.



Investigations will be conducted in a timely, confidential, objective and fair manner as is reasonable and appropriate having regard to the nature of the Reportable Conduct and the circumstances.

The Whistleblower (if they can be contacted) will receive updates on the progress of the investigation. The timing of those updates and the overall investigation will vary depending on the nature of the disclosure, the information available and how the Whistleblower communicates with the Program. It is recommended that a Whistleblower who wishes to remain anonymous maintain ongoing two-way communication with the WPO and/or Whistleblower Program to enable follow-up questions to be asked and/or to provide feedback.

The Program will seek to conclude the investigation promptly and to make findings as to whether on the balance of probabilities the allegations have been proven, not proven or otherwise.

In many cases the Whistleblower Program will notify the Whistleblower of the investigation outcome/s, except where it is not appropriate. The Whistleblower is expected to keep this information confidential. The findings of the investigation will be shared on a confidential basis with those responsible for implementation and oversight of the policy.

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Serious criminal and other matters may need to be reported to police or relevant regulatory authorities.

Where misconduct is revealed through the investigation, Service Stream will determine any applicable consequences, including disciplinary action. Disciplinary outcomes remain confidential to the individual concerned.

If a Whistleblower is not satisfied with the investigation outcome, this can be raised directly with the Whistleblower Program.

6. FAIR TREATMENT

Service Stream is committed to ensuring the fair treatment of any person mentioned in a disclosure made under this policy (including those who are the subject of a disclosure) by applying these general principles, subject to any limitations imposed by law or confidentiality requirements:

- maintaining the confidentiality of information contained in the report;
- handling information in accordance with this policy;
- handling any investigation in accordance with this policy and any applicable investigation guidelines Service Stream implements;
- providing the individual with an opportunity to respond to allegations made against them; and
- providing access to our Employee Assistance Program provider LifeWorks (LifeWorks can be accessed 24/7 by phone: **1300 361 008**).

If any Whistleblower has material concerns that this policy has not been adhered to in the handling of their disclosure, they may raise the concern with the WPO (if one has been appointed) or with any member of the Whistleblower Program. Service Stream is not obliged to re-open a completed investigation.

7. MONITORING AND OVERSIGHT

The Whistleblower Program will provide updates to the Service Stream Board on whistleblower matters as required. These reports will comply with confidentiality requirements. The Program will also provide periodic updates to the Audit & Risk Committee and/or the Board to enable monitoring and oversight of the effectiveness of this policy and the Framework. These reports may include, in aggregated / anonymous form, some or all of the following information:

- summary analytics of the types of reports made;
- results of investigations and relevant timeframes;
- feedback from Whistleblowers; and
- status of the Whistleblower Program and trends, concerns or emerging risks.

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8. BREACH OF THIS POLICY

A Service Stream employee or contractor who is found to have breached this policy, including by breaching confidentiality or subjecting or threatening to subject a person to whistleblowing-related Detrimental Action, will be subject to serious disciplinary action up to and including termination of employment or engagement, which may be without notice, and may also be guilty of an offence under the Whistleblower Laws.

If a court finds a breach of the protections concerning confidentiality or Detrimental Action, the court may order the person and/or Service Stream to:

- pay compensation to the person; and/or
- pay substantial fines and / or go to jail.

9. ACCESS TO AND REVIEW OF THIS POLICY

A copy of this Policy is available on our intranet and website (at www.servicestream.com.au/about/corporate-governance) or can be requested from a member of the Whistleblower Program.

This Policy will be reviewed periodically to ensure it remains effective, consistent with applicable standards and complies with the Whistleblower Laws. Material changes will be approved by the Board.