



SACGASCO LIMITED

WHISTLEBLOWER PROTECTION POLICY

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1. Policy purpose and application

The Directors of the Company are committed to the protection of those persons who disclose information about alleged illegal or improper conduct (including unethical, corrupt or other inappropriate conduct).

This policy has been adopted to provide formal and informal channels for employees and other disclosers to raise concerns with no fear of reprisal or detrimental treatment.

This policy sets out:

- Who is entitled to whistleblower protection
- What protections whistleblowers are entitled to
- How disclosures made by a whistleblower in accordance with this policy will be handled by the Company.

This policy must be complied with by all officers, employees, contractors or suppliers and consultants to the company. The policy also applies to any deemed associates of these people.

2. Who is eligible for whistleblower protection under this policy?

To be treated as a whistleblower under this policy you must:

- Be a current or former officer or employee of the company, a contractor or supplier of services to the company, a consultant to the company or an associate of these parties. The policy also applies to family members of the above parties.
- Disclose information regarding the type of matters this policy covers. Disclosure can be about improper conduct which you suspect on reasonable grounds has occurred or is occurring within the company, including conduct by an officer (including directors) or employees of the company. Disclosures cannot be made under this policy about solely personal work-related grievances. Such grievances should be reported to your direct manager, or human resources representative. Personal grievances do not include victimisation of an individual or where the matter could have significant implication to the company- these are covered by this policy.

Examples of disclosable matters include:

- Misconduct or an improper state of affairs or circumstances in relation to the company, including in relation to corporate governance, accounting or audit matters, tax affairs and substantial mismanagement of company resources.
- Illegal conduct at the company, or by an officer or employee of the company, such as fraud, corruption, bribery, theft, violence, harassment or intimidation, criminal damage to property or other breaches of applicable laws
- Conduct that is contrary to, or a breach of, company policies (including the code of conduct policy)
- Conduct at the company that represents a danger to the public, including public health, safety or the environment.
- Conduct which amounts to an abuse of authority

- Conduct which may cause financial loss to the company or damage to its reputation or be otherwise detrimental to the company's interests.

Who should I disclose to?

To ensure appropriate escalation and timely investigation of matters under this policy, employees should first report any matters of concern to their direct manager or the CEO. Where that is not appropriate, where the person making the report does not feel comfortable making an internal report, or where an employee has made an internal report but no action has been taken within a reasonable time, the report can be made to the Board of the company through the Company Secretary, who is deemed the whistleblower protection officer (WPO).

A report can be made directly to the WPO, and can be made in person, by phone or by email. The WPO will safeguard the interests of the discloser making a report and will ensure the integrity of the reporting mechanism.

The WPO will supervise the investigation of reports made under this policy.

The WPO reports directly to the Chair of the Board and to the Audit and Risk committee (if applicable). The WPO will have access to independent advisers if and when required.

3. Confidentiality

3.1 Whistleblower identity must be kept confidential

The identity of a whistleblower (or information that is likely to lead to their identity becoming known) must be kept confidential unless the whistleblower has consented to the disclosure.

3.2 Permitted exceptions

The identity of a whistleblower may be disclosed without the whistleblower's consent if the disclosure is made:

- to a lawyer for the purpose of obtaining legal advice or legal representation in relation to the operation of Australian whistleblower laws
- to the police
- to ASIC, ASX or the ATO.

3.3. Provision of whistleblower information to a court

No person at the company may disclose or produce to a court or tribunal any information or documents which disclose the identity of a whistleblower without legal advice from the company's legal counsel.

3.4 Support for disclosers

Support for disclosers will include connecting the discloser with access to external agencies when and if required, appointing an independent support person from the company to deal with any ongoing concerns they may have and connecting the discloser with third party support providers if required. Use of support services may entail the discloser consenting to disclosure of their identity.

4. Prohibition against victimisation

No person at the company may cause or threaten any detriment to any person for a reason which includes that they or any other person:

- Is or proposes to be a whistleblower, or
- Is suspected or believed to be, or could be, a whistleblower.

Detriment includes dismissal, injury to an employee, alteration to an employee's position or duties to their disadvantage, discrimination, harassment or intimidation, harm or injury including psychological harm, damage to property, reputation or financial position.

However, a whistleblower may be held liable for any personal misconduct revealed by their disclosure or an investigation following a disclosure.

5. Investigations of information disclosed under this policy

When a disclosure is made which may fall under this policy, the following steps must be followed except where, in the opinion of the WPO, it would be inappropriate or unreasonable in the circumstances to do so:

- Any person who receives the disclosable information must provide the information to the WPO as soon as practicable, removing any information which identifies or may identify the discloser of the information prior to doing so (unless the whistleblower has provided consent to that disclosure)
- As soon as practicable, the WPO must determine whether the disclosure falls within the scope of this policy and, if so, appoint an investigator with no personal interest in the matter to conduct an independent investigation into the matter disclosed.
- The investigator must conduct any investigation in an objective and fair manner, ensuring to provide any employee who has been adversely mentioned in information provided by the whistleblower an opportunity to respond to the allegations made in respect of them prior to any adverse findings being made
- The outcome of the investigation must be reported to the Board or its delegated subcommittee and may be reported to the whistleblower and any persons affected as the WPO considers appropriate.
- The identity of the whistleblower must be kept confidential at all times during and after the investigation, including in any reporting to the Board or to any person affected. All persons responsible for or involved in an investigation must take all reasonable steps to reduce the risk that a whistleblower will be identified.
- A whistleblower should raise any concerns or complaints regarding this policy or their treatment with the WPO.

Support for person implicated will be provided. No action will be taken against persons or parties who are implicated in a report under this policy until a full investigation has determined whether any allegations against them are substantiated. An employee or officer who is implicated may be temporarily stood down on full pay whilst an investigation is in process. An employee or officer who has been implicated in a disclosure has a right to be

informed of the allegations against them and must be given an opportunity to respond to those allegations and provide additional information, if relevant, in the course of an investigation into those allegations.

6. Reporting to the Board or its delegated committee and the discloser

Subject to the confidentiality obligations, the Company Secretary must provide the Board or its delegated subcommittee reports on all material whistleblower matters, including information on the status of any investigation underway and the outcomes of any investigations completed and actions taken as a result of those investigations.

Wherever possible, and assuming that the identity of the discloser is known, the discloser will be kept informed of the progress and outcomes of the investigation, subject to privacy and confidentiality considerations.

7. Australian whistleblower laws

By making a disclosure in accordance with this policy, you may be afforded protection under Australian whistleblower laws. While this policy principally deals with internal disclosures of information, Australian whistleblower laws also protect some types of disclosure made to external parties. Any person who is a whistleblower under Australian whistleblower laws must be treated in accordance with, and is entitled to, protections afforded by, this policy.

8. Consequences of non compliance

Any breach of this policy by an officer, employee, consultant or contractor will be taken seriously by the company and may be the subject of a separate investigation and/or disciplinary action. A breach of this policy may also amount to a civil or criminal contravention under Australian whistleblower laws, giving rise to significant penalties.

9. Policy review

This policy will be reviewed every two years to ensure it remains consistent with all relevant legislative requirements, as well as the changing nature of the company. This policy may be amended or replaced from time to time at the sole discretion of the company.

Approved by: The Board of the company

Last updated: 18 December 2019