



Whistleblowing Policy

1. BACKGROUND

Consistent with Lochard Energy's principles and values, we:

- recognise the value of transparency and integrity in our operations and management practices;
- are committed to creating and maintaining a supportive environment where our people feel comfortable and protected to make a disclosure of an alleged wrongdoing without detriment; and
- support a fair, impartial and timely process of investigating alleged wrongdoings, and proportionate actions are taken in response to the extent that such alleged wrongdoings are found to exist.

2. PURPOSE

The purpose of this Policy is to:

- encourage more disclosures of wrongdoing and help to deter wrongdoing;
- provide an understanding of what can be reported under this Policy;
- demonstrate the importance Lochard Energy places on ensuring a safe, secure and supportive environment where our people feel confident to raise breaches of internal rules or disclosable matters relating to the organisation, its officers or employees without detriment;
- assist to create and nurture a culture within Lochard Energy that encourages our people to speak up and raise breaches of internal rules or policy or disclosable matters;
- explain the processes and practical steps to take for reporting breaches of internal rules or policy or disclosable matters, including what happens when you make a report; and
- outline how you will be protected if you make a disclosure.

Further details of the purpose of this Policy and the protections available are set out in the Annexure.

3. RELATIONSHIP TO OTHER POLICIES

This Policy:

- forms a part of our risk management system and corporate governance framework;
- is one of the mechanisms in our risk management tool kit for identifying wrongdoing;
- is available to all employees as part of their employment information.

This Policy can be varied by Lochard Energy, from time to time, at its sole discretion.

4. SCOPE

This Policy applies to individuals who are, or have been:

- Employees
- Officers (directors and company secretaries)
- Service providers e.g. contractors, consultants, secondees.

This Policy also applies to the abovementioned individual's spouses, dependents and other relatives.

5. POLICY OWNER

This Policy is owned by the Chief Executive Officer.

6. WHAT ARE DISCLOSABLE MATTERS?

Disclosable matters involve information that the whistleblower has reasonable grounds to suspect concern misconduct, or an improper state of affairs or circumstances, in relation to a Lochard Energy company.

Information that indicates a significant risk to public safety or the stability of, or confidence in, the financial system is also a disclosable matter.

Examples of disclosable matters include:

- an unlawful or criminal offence, or a breach of law;
- a breach of Lochard Energy's Policies;
- misuse of the organisation's resources or opportunities, including fraud, money laundering or corruption or bribery;
- unauthorised payments being made or financial irregularities;
- conduct endangering health and safety (relating to Lochard Energy or the public) or causing unlawful damage to the environment;
- unauthorised use of Lochard Energy's confidential information.

Lochard Energy encourages those who are aware of wrongdoing to speak up.

There is no requirement for a whistleblower to identify themselves in order for a disclosure to qualify for protection under this Policy and the Corporations Act.

Disclosures about matters that are not 'disclosable matters' do not qualify for protection under this Policy or the Corporations Act.

Personal work-related grievances

In particular, matters that are solely personal work-related grievances are not disclosable matters which can be reported under this Policy and are not given whistleblower protections under the Corporations Act.

Personal work-related grievances relate to current or former employment and have implications for the whistleblower personally, but do not have any other significant implications for the organisation or do not relate to conduct 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;
- a decision to suspend or terminate the engagement of the whistleblower, or otherwise to discipline the whistleblower.

Personal work-related grievances should be raised internally using Lochard Energy's Grievance Policy.

7. HOW TO MAKE A DISCLOSURE UNDER THIS POLICY

A disclosure may be made:

- A. internally to our organisation;
- B. to our independent whistleblower service provider – Your Call;
- C. to certain regulatory bodies and other external parties.

Disclosures must be made in one of these three ways to be eligible for protection under this Policy.

Disclosures can be made anonymously and/or confidentially, securely and either inside or outside business hours.

A. Making a Disclosure Internally to our Organisation

We support openness and teamwork. This Policy is not intended to replace our first obligation to resolve issues quickly and internally where appropriate. If you consider making an internal disclosure is appropriate for the circumstances and you do not wish to remain anonymous, you are encouraged to raise misconduct as early as possible with your supervisors and managers and to resolve misconduct informally and internally.

If you do not feel comfortable or consider it inappropriate to raise misconduct with your supervisor or manager, you may make a disclosure to an officer or senior executive of Lochard Energy, including any of the Disclosure Officers listed below:

Lochard Energy's Disclosure Officers are:

- GM People & Safety (Jenny Smith, jenny.smith@lochardenergy.com.au or (03) 8646 0503)
- Chief Financial Officer (Steve Brent, steve.brent@lochardenergy.com.au or (03) 8646 0520).

B. Making a disclosure to independent service provider - Your Call

If for any reason you do not feel comfortable or able to make a disclosure internally, you may do so to our independent whistleblower service provider, Your Call.

Your Call operates under a Service Agreement with Lochard Energy and acts as the intermediary, providing the means for a whistleblower to remain anonymous. Disclosures received by Your Call are reported to us in accordance with this Policy. Your Call also enables us to obtain further information if required and enables the whistleblower to receive updates from us.

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 you to:

- communicate with Your Call and/or Lochard Energy without revealing your identity;
- securely upload any relevant documentation and/or material that you wish to provide;
- receive updates; and
- request support or report detrimental acts.

This option allows you to:

- remain completely anonymous if you wish;
- identify yourself to Your Call only; or
- identify yourself to both Your Call and Lochard Energy.

Your Call reporting options include:

- **Website:** <https://www.yourcall.com.au/report>
(Available 24/7; our organisation's unique identifier code is: "IONA"); or
- **Telephone:** 1300 790 228
(Available between 9am and 12am AEST on recognised Australian national business days).

In the event a disclosure received by Your Call relates to a Disclosure Officer, Your Call will exclude that Disclosure Officer from all communications when providing the disclosure to our organisation. The Disclosure Officers who are not named in the disclosure will then receive and determine how the matter

will be addressed or investigated as required. Your Call remains an independent intermediary at all times and will only communicate with those authorised within our organisation.

C. Making a disclosure to regulatory bodies and other external parties

Disclosures may also be made to regulatory bodies and other external parties in certain circumstances. Further details are provided in the Annexure to this Policy.

8. WHERE CAN I GET INFORMATION AND ADVICE?

If you need further information and advice about making a disclosure or the support and protection available, you may discuss the matter in confidence with your immediate supervisor, manager, the GM People and Safety, or the General Counsel. If you wish to receive any further information and advice beyond this Policy on an anonymous basis, you will need to contact Your Call (details provided in section 7B above) or contact an independent, external lawyer (further information on this is set out in the Annexure).

Note: In the event you do not formally make a disclosure, but you provide information to Lochard Energy personnel about a matter in the course of seeking further information and advice, the Lochard Energy personnel that you have spoken to may nevertheless be compelled to act on the information provided during the discussion if the information reasonably suggests misconduct has or may occur.

9. PROTECTIONS UNDER THE LAW

To qualify for protection as a whistleblower under the Corporations Act and this Policy you must meet all three of the following requirements:

- you must be an eligible whistleblower (as set out in section 4 of this Policy)
- disclose a 'disclosable matter' (as set out in section 6 of this Policy)
- make the disclosure through an appropriate reporting channel and recipient (as set out in section 7 of this Policy)

A whistleblower who has reasonable grounds to suspect a disclosable matter can still qualify for protection even if the disclosure turns out to be incorrect.

10. DO I HAVE TO DISCLOSE MY IDENTITY?

Disclosures can be made anonymously and still be protected under the Corporations Act and this Policy.

Anonymity can only be achieved by a whistleblower by making all disclosures through Your Call, not by making a disclosure to Lochard Energy personnel. Through the Your Call service, a whistleblower 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.

Whistleblowers who wish to remain anonymous via the Your Call service are encouraged to maintain ongoing two-way communication via the Your Call Message Board described above, so that follow-up questions can be asked and any feedback can be provided to you.

11. WILL MY IDENTITY BE PROTECTED?

Lochard Energy has legal obligations to protect the confidentiality of a whistleblower's identity. If you choose to utilise the Your Call service on an anonymous basis, this will provide you the highest confidentiality protection.

Lochard Energy is permitted to disclose information about a matter to others, provided that all reasonable steps have been taken to reduce the risk that the whistleblower will be identified and it is reasonably necessary for investigating the issues raised in the disclosure, and so long as it does not include the whistleblower's identity,

Lochard Energy can only disclose the identity of a whistleblower or information that is likely to lead to the identification of the whistleblower (obtained because the whistleblower made a disclosure that qualifies for protection) if:

- you consent to disclosing your identity;
- to ASIC or the Australian Federal Police;
- to a lawyer for the purposes of obtaining legal advice about the Corporations Act whistleblower protections.

As a whistleblower 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.

Further details on the measures and mechanisms for protecting the confidentiality of a whistleblower's identity are set out in the Annexure.

12. PROTECTION AGAINST DETRIMENTAL CONDUCT

Lochard Energy will do everything reasonably possible to support and protect anyone who:

- intends to or actually makes a disclosure of disclosable conduct under this Policy;
- is mentioned in the disclosure;
- acts as a witness; or
- otherwise assists with the investigation and resolution of the disclosure, from detrimental conduct, acts and omissions.

Examples of detrimental conduct, acts and omissions that are prohibited in this context 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;
- 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 whistleblower from detriment (e.g. moving a whistleblower who has made a disclosure about their immediate work area to another work area to prevent them from detriment); and
- managing a whistleblower's unsatisfactory work performance if the action is in line with the organisation's performance management framework.

Further information on how Lochard Energy assesses and controls the risk of detriment is set out in the Annexure.

13. SUPPORT AND PROTECTION

Whistleblowers

If necessary, Lochard Energy will appoint a Protection Officer to arrange or coordinate support and protection for any whistleblower who has or is in the process of making a disclosure.

The whistleblower can contact the GM People & Safety or Your Call to discuss how a Protection Officer may be able to provide support and protection.

The Protection Officer is appointed by Lochard Energy to:

- assess the immediate welfare and protection needs of a whistleblower;
- safeguard the interests of a whistleblower in accordance with this Policy and the law; and
- address any issues or concerns of detrimental acts/detrimental treatment.

We may appoint a person from within the organisation or a third party to be the Protection Officer for the whistleblower.

Parties against whom a disclosure has been made

An employee who is the subject of a disclosure will be advised about the subject matter of the disclosure as and when required by principles of natural justice and procedural fairness and prior to any actions being taken.

An employee who is the subject of a disclosure may contact the EAP provider for support (Converge International on 1300 687 327).

14. WHAT WILL WE DO WITH THE DISCLOSURE?

The Disclosure Officers have been appointed by Lochard Energy to receive the disclosure directly from you (if you make an internal disclosure to our organisation) or from Your Call (if you make an external disclosure to Your Call).

The Disclosure Officers will:

- carefully assess the information provided to decide the best action to take, including whether it qualifies for protection under this Policy and whether an investigation is required to determine whether the misconduct is substantiated or not;
- keep the information provided confidential in line with section 11 above;
- coordinate and oversee the investigation if an investigator has been appointed;
- appoint a Protection Officer to support and protect the whistleblower, if necessary, from detrimental acts;
- advise the whistleblower (through Your Call where anonymity is requested) of the progress of the matter to the extent it is legally permissible and appropriate to do so;
- take all reasonable steps to ensure fair treatment for and to ensure the identity of the whistleblower and the person/s who is the subject of the disclosure are kept confidential in line with section 11 above .

15. INVESTIGATION OF THE DISCLOSURE

If the Disclosure Officers consider an investigation to be appropriate, the Disclosure Officers will 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 to support the investigation; and
- a timeframe for the investigation.

The process for investigating disclosures may vary depending on the nature of the disclosure.

Further, in some cases, Lochard Energy may not be able to undertake an investigation if it is unable to contact the whistleblower (for example, if the disclosure is made anonymously to Your Call and the whistleblower has chosen not to provide a means of contacting them) and insufficient information has been provided.

16. HOW WILL THE INVESTIGATION BE CONDUCTED?

The investigation will be conducted in a constructive and impartial way.

The investigator will:

- gather information, material and documentation concerning the disclosure as soon as is reasonably practicable;
- focus on the substance of the disclosure;
- not assume that disclosures about conduct or behaviour that appear to have had a personal impact on a whistleblower are somehow less serious. The whistleblower's experience may indicate a larger or systemic issue;
- complete the investigation and provide a report of their findings as soon as is reasonably practical.

Unless the whistleblower consents, Lochard Energy cannot disclose information that is likely to lead to disclosure of the identification of the whistleblower as part of the investigation process. Information is allowed to be disclosed where the information does not include the whistleblower's identity, Lochard Energy removes identifying details from the information, and it is reasonably necessary for investigating the issues raised in the disclosure.

17. INVESTIGATOR'S REPORT

At the conclusion of the investigation, the investigator will provide a written report (bearing in mind any obligations of confidentiality) including:

- a finding of all relevant facts;
- whether the disclosure is substantiated, not substantiated or otherwise; and
- recommendation/s, when requested to do so, as to any action that may be taken in respect of the findings.

Lochard Energy will use the report to determine the action (if any) to be taken, including any disciplinary action. The findings will be communicated to the relevant parties involved to the extent that it is legally permissible and appropriate to do so.

18. WILL THE WHISLTBLOWER BE KEPT INFORMED?

A whistleblower will be provided with regular updates on the investigation, if the whistleblower can be contacted (including through anonymous channels). The frequency and timeframe for updates may vary depending on the nature of the disclosures.

In general, Lochard Energy will acknowledge a whistleblower after receiving the disclosure and, subject to confidentiality, privacy and other legal requirements, the whistleblower will be kept informed of:

- when the investigation process has begun;
- relevant progress of the investigation; and
- the outcome of the investigation.

19. WHAT HAPPENS IF THE MISCONDUCT IS SUBSTANTIATED?

If the misconduct is substantiated, Lochard Energy will decide what action to take, including disciplinary action up to dismissal. The disciplinary action will depend on the severity, nature and circumstance of the misconduct.

20. AVENUES FOR REVIEW

A whistleblower may request a review of the investigation findings if the whistleblower is not satisfied with the outcome. If that request is granted, the review will be conducted by a senior Lochard Energy employee or officer or a third party who is not involved in handling and investigating disclosures.

Lochard Energy is not obliged to reopen an investigation if it finds that the investigation was conducted properly, or new information is either not available or would not change the findings of the investigation.

21. WHAT ARE THE CONSEQUENCES OF MAKING A FALSE DISCLOSURE?

Lochard Energy discourages deliberate false reporting under this Policy. Anyone who makes a disclosure knowing it to be false or misleading may be subject to disciplinary action, including dismissal. The disciplinary action will depend on the severity, nature and circumstance of the false disclosure.

Lochard Energy however does not wish to deter staff from making disclosures. In cases where whistleblowers have reasonable grounds to suspect that there is a disclosable matter and have some information leading to a suspicion, but not all the details, staff are encouraged to speak up and report the misconduct and will not face disciplinary action in those circumstances.

22. MAKING THE POLICY AVAILABLE

Lochard Energy makes this Policy available to eligible whistleblowers by:

- posting the Policy on the staff intranet and Company website;
- making it available to all employees as part of their employment information; and
- incorporating the Policy in employee induction information packs and training for new starters.

23. TRAINING AND EDUCATION

The GM People & Safety will be responsible for conducting upfront and ongoing education and training on the Whistleblower Policy and procedures to all staff.

24. REVIEW OF THIS POLICY

The GM People & Safety will monitor and review this Policy and associated processes and procedures from time to time to ensure it meets its objectives.

Any amendments to this Policy shall be made known to employees and officers of our organisation by posting an updated version of the Policy on the intranet and website and providing training when necessary.

ANNEXURE – FURTHER INFORMATION

SECTION 2 – PURPOSE OF THIS POLICY

Under the Corporations Act and this Policy, eligible whistleblowers who report certain types of wrongdoing (which are known as 'disclosable matters') are granted 'whistleblower protection', that is they are protected from civil, criminal and administrative liability in relation to the disclosure.

This means they cannot be subject to any legal action against them for breach of an employment contract, duty of confidentiality or other contractual obligation, criminal action (for example, for unlawfully releasing information), or disciplinary action for making the disclosure. These protections, however, do not grant immunity for any misconduct a whistleblower has engaged in that is revealed in their disclosure.

SECTION 6 – WHAT ARE DISCLOSABLE MATTERS?

Personal work-related grievances

Note: a personal work-related grievance may still qualify for protection under this Policy and the Corporations Act in certain circumstances, including disclosures of matters covered by this Policy which also include a personal grievance, serious breaches of employment or other laws, or matters that represent a danger to the public.

SECTION 7 – HOW TO MAKE A DISCLOSURE UNDER THIS POLICY

C. Making a disclosure to regulatory bodies and other external parties

Disclosures may also be made to an external auditor or regulator (ASIC, ATO, APRA).

Further, in certain limited public interest and emergency situations, disclosures made to a journalist or parliamentarian can also receive protection under the Corporations Act.

It is important that the whistleblower understands the criteria for making a public interest or emergency disclosure, including that the disclosure must have first been raised with ASIC or another regulatory body, that timing requirements apply, and that written notice of the impending disclosure be given to Lochard Energy.

A whistleblower should contact an independent legal adviser before making a public interest or emergency disclosure. If a whistleblower does not follow appropriate procedure, the disclosure may not be protected by this Policy or the Corporations Act. Further information is outlined in a) and b) below.

a) 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 sufficient 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.

b) 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 Corporations 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
6. necessary to inform the recipient of the substantial and imminent danger.

There are also protections available in the tax whistleblower regime under the Taxation Administration Act.

SECTION 8 - WHERE CAN I GET INFORMATION AND ADVICE?

You also have the option of seeking information and advice from an external lawyer.

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 Corporations Act (which includes the whistleblower protections and confidentiality of a whistleblower's identity) the disclosure will be protected under the Corporations Act, even if the legal practitioner concludes that a disclosure does not relate to a 'disclosable matter'.

SECTION 11 – WILL MY IDENTITY BE PROTECTED?

Measures and mechanisms for protecting the confidentiality of a whistleblower's identity

Lochard Energy has in place the following measures and mechanisms for protecting the confidentiality of a whistleblower's identity:

Reducing the risk that the whistleblower will be identified from the information contained in a disclosure

- all personal information or reference to the whistleblower witnessing an event will be redacted

- the whistleblower will be referred to in a gender-neutral context
- where possible, the whistleblower will be contacted to help identify certain aspects of their disclosure that could inadvertently identify them; and
- disclosures will be handled and investigated by appropriately trained staff or officers.

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 whistleblower's identity (subject to the whistleblower's consent) or information that is likely to lead to the identification of the whistleblower
- communications and documents relating to the investigation of a disclosure will not be sent to an email address or printed in a way that is accessible 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 whistleblower'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, is illegal and will be regarded as a disciplinary matter and will be dealt with in accordance with Lochard Energy's disciplinary procedures.

You can lodge a complaint with us if you believe a breach of your confidentiality as a whistleblower has occurred by contacting the GM People & Safety or General Counsel. You can also lodge a complaint with a regulator including ASIC or the ATO if you believe a breach of your confidentiality as a whistleblower has occurred. You may also be eligible to claim compensation and remedies under the Corporations Act.

As a whistleblower 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.

SECTION 12 – PROTECTION AGAINST DETRIMENTAL CONDUCT

Lochard Energy has established processes for assessing and controlling the risk of detriment and keeps records of its risk assessments and risk control plans.

Measures and mechanisms for protecting whistleblowers from detriment

Lochard Energy has in place the following measures and mechanisms to protect whistleblowers from detriment:

- processes for assessing the risk of detriment against a whistleblower and other persons (e.g. other staff who might be suspected to have made a disclosure), 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 whistleblowers. If you are an employee, you may like to use the Employee Assistance Program ("EAP"). The EAP provides you with free help from experienced counsellors, psychologists and social workers. Lochard Energy's EAP provider is Converge International and can be contacted by calling 1300 687 327. Further information is available on the intranet;
- strategies to help a whistleblower minimise and manage stress, time or performance impacts, or other challenges resulting from the disclosure or its investigation;

- actions for protecting a whistleblower from risk of detriment—for example, we may allow the whistleblower to perform their duties from another location, reassign the whistleblower to another role at the same level, make other modifications to the whistleblower’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 whistleblower;
- procedures on how a whistleblower can lodge a complaint if they have suffered detriment, and the actions we may take in response to such complaints; and
- interventions for protecting a whistleblower if detriment has already occurred— for example, we may investigate and address the detrimental conduct, such as by taking disciplinary action, or we may allow the whistleblower to take extended leave, develop a career development plan for the whistleblower that includes new training and career opportunities, or offer compensation or other remedies.

We will thoroughly investigate 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 Corporations Act which carries serious penalties for individuals and companies. If you are a whistleblower of a disclosable matter and you suffer detrimental acts or detrimental acts, you may also be eligible to claim compensation and remedies under the Corporations Act. Nothing in this Policy is intended to change or take away any other protections which may be available at law. A whistleblower (or other employee) can seek compensation and other remedies through the courts if they suffer loss, damage or injury because of a disclosure and Lochard Energy failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

A whistleblower may seek independent legal advice or contact regulatory bodies, such as ASIC or the ATO, if they believe they have suffered detriment.