



# Whistleblower Policy

OneVue Holdings Limited

ACN 108 221 870

June 2020

*Strength in numbers*

## Document history

Version number	Reviewed date	Author	Approval
v 0.1	October 2015	Head of HR	-----
v.1.0	June 2015	Head of HR	Approved by the Board of OneVue Holdings Limited June 2015
v 2.0	November 2017	Senior Legal Counsel	Approved by the Board of OneVue Holdings Limited December 2017
v 3.0	June 2019	Head of HR & Procurement and EGM Group Risk & Compliance	Approved by the Board of OneVue Holdings Limited June 2019
v 4.0	June 2020	Head of People & Culture and Group Chief Risk Officer	Various amendments made to reflect changes to the ASX corporate governance principles and recommendations (4 <sup>th</sup> Ed) and to ensure it is consistent with best practice

**Policy owners:** Head of People & Culture and Group Chief Risk Officer

**Policy approver:** Board of OneVue Holdings Limited

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## 1. Definitions

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Specific terms and abbreviations have the following meaning:

<b>ASIC</b>	means the Australian Securities and Investments Commission
<b>APRA</b>	means the Australian Prudential Regulation Authority
<b>ATO</b>	means the Australian Taxation Office
<b>Auditor</b>	means an auditor of OneVue or any of its subsidiary companies
<b>Actuary</b>	means an actuary appointed to a superannuation entity
<b>OneVue or Company</b>	OneVue Holdings Limited and its subsidiary companies
<b>Director</b>	A Director of OneVue or any of its subsidiary companies
<b>Discloser</b>	A person making a report of Improper Conduct
<b>Contractor</b>	a person (individual or entity) that has contracted to supply goods or services to OneVue, other than under a contract of employment and includes: <ul style="list-style-type: none"><li>▪ a custodian or investment manager of a superannuation entity; and</li><li>▪ any employee of a Contractor, as defined in this Policy.</li></ul>
<b>Corporations Act</b>	means the Corporations Act 2001, as amended from time to time.
<b>Employees</b>	executives, management and other personnel engaged by OneVue on a contract of employment or a salaried basis
<b>Improper Conduct</b>	means the conduct described in Section 3 of this Policy
<b>Officer</b>	has the same meaning as in the Corporations Act, and includes, but is not limited to, a person who is a Director, Secretary or senior manager of OneVue or any of its subsidiary companies

## 2. Purpose and Scope

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This Policy applies to all Directors and Employees of OneVue. OneVue has a strong commitment to ensuring that all its business activities are carried out in a way that is both ethical and compliant. With this in mind, and, to promote OneVue's core values as set out in the Statement of Values (in the Staff Code of Conduct), Directors and Employees are encouraged to report any Improper Conduct they encounter.

This policy outlines:

- the process for reporting Improper Conduct
- how OneVue will respond to reports of Improper Conduct
- guidance for persons receiving a report of Improper Conduct
- the ways in which OneVue will protect those who report Improper Conduct.

**Table A** provides a summary of the types of reports of Improper Conduct that are protected disclosures under the Corporations Act and also defines eligible whistleblower and eligible recipients in details.

OneVue is committed to protecting and supporting the dignity, wellbeing, career and good name of anyone who reports Improper Conduct in good faith.

To the extent practicable, the Company has adopted the recommendations provided in the *ASX Corporate Governance Council's Corporate Governance Principles and Recommendations* (4<sup>th</sup> Edition, 2020) (ASX Corporate Governance Principles).

## 3. Improper Conduct

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### 3.1 What is Improper Conduct?

For the purpose of this policy, 'Improper Conduct' is defined as the conduct of:

- OneVue; or
- An Officer, Employee or contractor of OneVue,

which, in the view of the Employee reporting the conduct on reasonable grounds is, without limitation:

- dishonest or unethical;
- fraudulent;
- bribery;
- corrupt;
- illegal;
- bullying or harassing;
- involves a misuse of sensitive or confidential information;
- involves misconduct or an improper state of affairs or circumstances, in relation to a superannuation entity of which a OneVue subsidiary is the trustee, or in relation to the trustee;
- is a danger to health, safety or the environment;
- any activity, which may cause a loss to OneVue or may damage OneVue's interests or reputation;
- directly or indirectly causing, or threatening to cause, disadvantage to a person or any third person as a result of the first person making a report of Improper Conduct;
- an attempt to conceal any of the above.

However, Improper Conduct does not include personal work-related grievances, unless the concern is about victimisation, breach of laws punishable by imprisonment for a period of 12 months or more.

### 3.2 Personal work-related grievances

Personal work-related grievances are grievances relating to a discloser that has personal implications rather than for the Company. Examples of personal work-related grievances are an interpersonal conflict between the Discloser and another Employee or a decision about the disclosure's employment status. These personal work-related grievances can be raised directly to the Discloser's manager or the People and Culture team.

## 4. How to report Improper Conduct

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Depending on the nature of the Improper Conduct, there are a number of different persons to whom Improper Conduct may be reported (see below).

A report of Improper Conduct may be made verbally (in person or by telephone) or in writing (including by email). Employees are encouraged to first discuss their concern with either their senior manager, the Head of People and Culture, the Group Chief Risk Officer, or the Managing Director, as appropriate. Their contact details are set out in Section 12 of this Policy. A report of Improper Conduct should contain sufficient information for the Company to assess and investigate the concerns raised in the report.

If the Employee is not satisfied that their concern will be properly dealt with by management they can raise it in confidence with:

- the Chairperson of the Company Board;
- the Chair of the Company's Audit, Risk Management and Compliance Committee; or
- the Chair of the Human Resources Nomination and Remuneration Committee

A report of Improper Conduct can be made anonymously. A Discloser may be encouraged to disclose their identity, however, they have no obligation to disclose their identity. A Discloser may maintain anonymity until the investigation is finalised. However, they should acknowledge that the anonymity will limit the effective investigation of the matter or OneVue's ability to provide a response to them directly.

Pursuant to the ASX Corporate Governance principles, OneVue will ensure that any material Improper Conduct reported to the individuals and groups listed below which includes the Company's Board and the Audit, Risk Management and Compliance Committee.

If the Improper Conduct concerns a contravention or suspected contravention of the Corporations Act, it may be reported to:

- a director, secretary or senior manager of the Company;
- the Company's auditor or a member of an audit team conducting an audit of the Company;
- the Company's Board;
- the Company's Audit, Risk Management and Compliance Committee;
- ASIC; or
- A member of the Australian Federal Police.

If the Improper Conduct concerns misconduct or an improper state of affairs or circumstances, in relation to a superannuation entity of which a OneVue subsidiary is the trustee, or in relation to the trustee, it may be reported to:

- The Company's Board;
- The Company's Audit, Risk Management and Compliance Committee;
- APRA (for APRA-regulated superannuation entities);
- ATO (the regulator of self-managed superannuation entities);
- the actuary or auditor of the superannuation entity;
- an individual who is a trustee of the superannuation entity; or
- a director of the body corporate that is the trustee of the superannuation entity.

## 5. How OneVue will respond to a report of Improper Conduct

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### 5.1 Protecting Confidentiality

All disclosures under this policy will be treated as confidential. This applies also to those reports of Improper Conduct made anonymously. OneVue will not disclose such information to anyone not connected with the investigation without the consent of the person raising the Improper Conduct, or unless the Managing Director and/or Chief Financial Officer are obliged to do so by law.

Information coming into the possession of a person from a Discloser, the identity of a Discloser or information which may lead to the Discloser's identity becoming known, must not be released to anyone who is not involved in the investigation or resolution of the matter without authority from the Managing Director.

OneVue may request (but cannot require) the Discloser to consent in writing to disclosure to a limited number of people to do any of the following:

- enable a proper investigation to be made;
- enable OneVue to keep the person making the report informed of the progress or outcome of the investigation of the Improper Conduct;
- enable OneVue to seek appropriate professional advice in relation to the subject matter of the report; or
- enable appropriate remedial action to be taken in relation to the subject matter of the report.

A **consent form** is at **Appendix 1**.

The Discloser is entitled to decline to give their consent to disclosure. However, this may limit the action which OneVue is able to take to investigate or address the Improper Conduct.

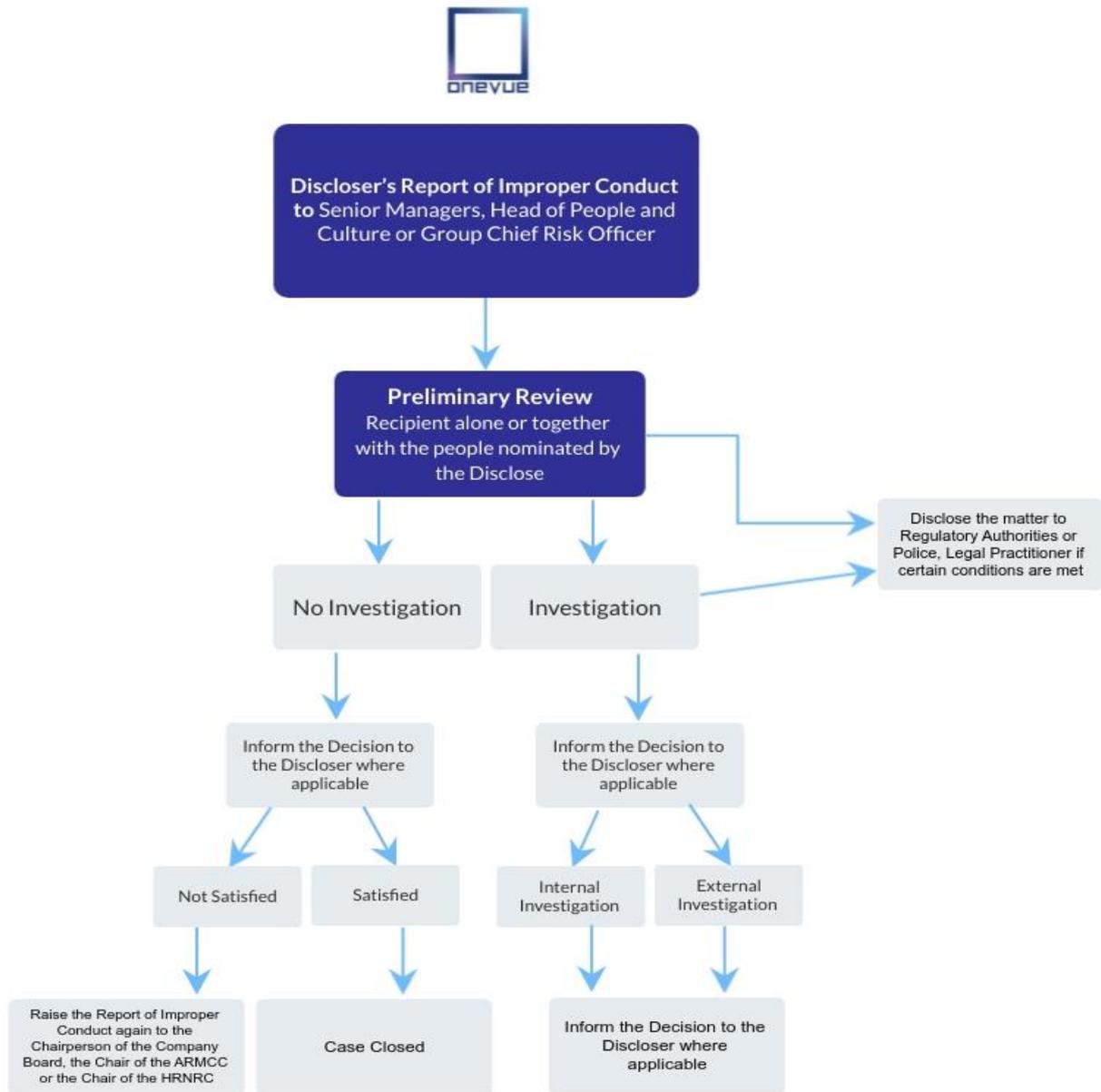
The Corporations Act authorises disclosure (i.e. consent is not required) of the above information where the report is a protected disclosure under the Corporations Act (see **Table A**), and the disclosure is made to ASIC, APRA, a member of the Australian Federal Police or a legal practitioner for the purpose of obtaining legal advice or legal representation.

## 5.2 Investigation procedure

Due to the varied nature of these sorts of matters, which may involve an internal or external investigator and/or the police, it is not possible to lay down precise timelines for investigations. Investigations are to be undertaken in timely manner without affecting the quality and depth of those investigations. Regardless of the nature of each matter and the estimated investigation time, the Discloser will be informed of the status of the report of Improper Conduct within 60 calendar days from the date first disclosure was made, where applicable ("Initial Status Update").

As set out in the flowchart below, the person receiving the report of Improper Conduct shall undertake a preliminary review of the concern raised and determine if the matter should be investigated further or not.

If the person determines that the matter needs to be investigated, the Company will follow a confidential, fair and objective process. The Company will form an investigation panel comprised of persons the Discloser selected in the Consent Form to have the matter disclosed to. If none selected or the report of Improper Conduct was raised anonymously, the Company shall form a panel comprised of adequate number of people listed in Section 12 of this Policy, depending on the nature of the matter, and that is independent from the individuals about whom the report of Improper Conduct was raised. The investigation processes will vary depending on the nature of the Improper Conduct and the amount of information provided.



For a report to be investigated it must contain sufficient information to form a reasonable basis for investigation. Thus, Disclosers of any matters are encouraged to provide as much information as possible so as not to compromise the ability to fully investigate the disclosure.

The Discloser should be kept informed of the progress of the investigations and, if appropriate, of the final outcome.

Notwithstanding Section 4 which allows the Company to disclose content of a report of Improper Conduct involving a contravention of the Corporations Act or the Company's superannuation entity, if a report of Improper Conduct contains any material incidents, the matter will be addressed to the Board or the Audit, Risk Management and Compliance Committee.

If appropriate, a copy of the outcomes maybe provided to external service providers to enable a review of the procedures.

If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the Employee is not satisfied with the outcome, OneVue may seek legal advice.

## 5.3 Protection for Disclosers

A Discloser who reports Improper Conduct, on reasonable grounds, will not receive all forms of detrimental conduct as a result of having made the report.

Detrimental conduct includes, but is not limited to, any of:

- Dismissal or suspension or demotion
- Any form of harassment, including being threatened
- Discrimination
- Physical or psychological harm.

Where a Discloser who has made a report of Improper Conduct considers that a detrimental conduct has been taken against them, their colleagues or relatives, which results in them or that person being personally disadvantaged, they should contact the Managing Director or Chairperson of the Board.

### 5.3.1 Statutory Protections – the Corporations Act and the Taxation Administration Act

The Corporations Act and the Taxation Administration Act provide additional protections in relation to the reporting of a possible contravention of the Corporations Act and other laws specified in the Act<sup>1</sup>, if the disclosure of Improper Conduct by a person qualifies for protection under the Corporations Act and Taxation Administration Act where the Discloser is an eligible whistleblower.

A Discloser is an eligible whistleblower when:

- a) the Discloser is:
  - (i) an Officer or Employee of OneVue,
  - (ii) a contractor (who has a contract for the supply of services or goods to OneVue) or an employee of such a contractor;
  - (iii) an associate of OneVue
  - (iv) an individual, or officer of a body corporate (or an employee of the body corporate), that is a trustee, custodian or investment manager of the superannuation entity;
  - (v) an employee of a person that supplies services or goods to a person referred to in (iii); or
  - (vi) a relative or dependent of the persons referred to in (i) - (iv); and
- b) the report of Improper Conduct is made to a relevant regulator or an "eligible recipient"<sup>2</sup>:
  - (i) a legal practitioner for the purposes of obtaining legal advice or legal representation;
  - (ii) OneVue's Auditor, or a member of the audit team;
  - (iii) OneVue's Actuary;

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<sup>1</sup> Refer to Table A

<sup>2</sup> Refer to Table A.

- (iv) an individual, or a director of a body corporate, that is a trustee, custodian or investment manager of the superannuation entity; or
  - (v) a director, secretary or senior manager of OneVue (for example, the immediate manager of the Discloser); and
- c) the Discloser has reasonable grounds to suspect that the information:
- (i) indicates that there has been a contravention of the Corporations Act or any of the Relevant Legislation by OneVue or any of its officers or employees; or
  - (ii) concerns misconduct, or an improper state of affairs or circumstances, in relation to the superannuation entity or a trustee of the entity, and the Discloser considers that the information may assist a person referred to in (a) to perform the person's functions in relation to the superannuation entity or trustee.

If these conditions are met, the Corporations Act and Taxation Administration Act provide the following protections to the eligible whistleblower.

- a) the eligible whistleblower's identity will be protected.
- b) The eligible whistleblower is not subject to any civil, criminal or administrative liability (including disciplinary action) for making the disclosure. The Discloser is not, however, protected from civil or criminal liability for any of its conduct which may be revealed by the report.
- c) The information provided by the eligible whistleblower is not admissible in evidence against the eligible whistleblower in any criminal proceedings or in proceedings for the imposition of a penalty, other than proceedings in respect of the falsity of the information.
- d) No contractual or other remedy may be enforced or exercised against the eligible whistleblower on the basis of the disclosure, and a contract to which the eligible whistleblower is a party may not be terminated on the basis that the disclosure constitutes a breach of the contract.
- e) If OneVue purports to terminate the employment of the eligible whistleblower on the basis of the disclosure, a court may reinstate the eligible whistleblower to the same position or a position at a comparable level.
- f) The eligible whistleblower is protected from actual or threatened detriment because of the report and may receive compensation for any damage caused by such detriment.
- g) Subject to limited exceptions, the person to whom the disclosure is made must not disclose the substance of the report, the eligible whistleblower's identity or information likely to lead to identification of the eligible whistleblower.

OneVue is committed to full compliance with these protective provisions. Refer to Table A for a summary of the requirements relating to protected disclosures.

## 6. Public interest and emergency disclosures

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### 6.1 Public Interest Disclosure

Where an eligible whistleblower has made their first disclosure at least 90 days ago and reasonably believes that the concern raised has not been adequately addressed even after receiving the Initial Status Update (where applicable), and further disclosure is necessary, the eligible whistleblower may make a further disclosure to members of Commonwealth, state or territory parliaments or a journalist.

### 6.2 Emergency Disclosure

Where an eligible whistleblower has made a first disclosure and believes that the information concerns a substantial and imminent danger to the health and safety of one or more persons or to the natural environment, the eligible whistleblower can make an emergency disclosure to members of Commonwealth,

state or territory parliaments or a journalist provided that the eligible whistleblower has made a written notice to whom the first disclosure was made to.

## 7. Employees mentioned in a disclosure

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Where an Employee is mentioned by a Discloser in a disclosure, that Employee will be advised that they have been mentioned, without disclosing the identity of the Discloser or any detail that may allow a reasonable person to identify the Discloser.

The Employee concerned will be advised of the proposed timeline for investigation and the outcome of that investigation.

These Employees will not suffer a detriment whilst the investigation is being undertaken, however may be stood-down on pay where OneVue determines it is appropriate to do so.

## 8. False reports of Improper Conduct

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OneVue takes deliberate or malicious false disclosures of Improper Conduct very seriously. Any Employee found to have made a false disclosure will be subject to disciplinary action, which may include termination of employment.

It is a criminal offence under the Corporations Act to make a statement that is intentionally false or misleading.

## 9. Guidance for persons receiving a report of Improper Conduct

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If you receive a report of Improper Conduct, it is prudent to first request the consent of the person making the report, **before you disclose to anyone else:**

- the information disclosed in the report, or
- the person's identity or information which would lead to the identification of the person making the report.

The Discloser is entitled to decline to give their consent.

If the report is a protected disclosure under either the Corporations Act (**see Table A**), it is a criminal offence to disclose the above information without consent except in the limited circumstances where disclosure is authorised under that legislation:

- The Corporations Act authorises disclosure (i.e. consent is not required) of the above information where the report is a protected disclosure under the Corporations Act (see Table A), and the disclosure of the information is made to ASIC, APRA or a member of the Australian Federal Police.

## 10. Training

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OneVue provides mandatory trainings to all staff on the Whistleblower Policy and this content is also included in new employee's induction program through OneVue's Legal and Compliance Team. OneVue's Legal and Compliance team also provides a separate training for those who may receive a report of Improper Conduct.

## 11. Breach of this Policy

Deliberate breach of this Policy will be taken very seriously and may result in disciplinary action, up to and including the termination of employment.

## 12. Review and publication

- This Policy will be reviewed regularly, having regard to the changing circumstances of the Company.
- All new management or other relevant Employees will be provided with a copy of this Policy as part of their induction into the Company. Any updates or amendments as approved by the Board will be notified to appropriate officers and Employees by the OneVue Company Secretary.
- The current Policy can also be accessed on the OneVue Holdings Limited website [www.onevue.com.au](http://www.onevue.com.au).

## 13. Contact Details if you would like to discuss a potential whistleblowing event:

<b>Managing Director:</b> Connie Mckeage	Details removed	Contact number: Details removed
<b>Head of People &amp; Culture:</b> George Ribar	Details removed	Contact number: Details removed
<b>Group Chief Risk Officer:</b> Stephen Blood	Details removed	Contact number: Details removed
<b>Chair of OneVue Holdings Limited:</b> Ron Dewhurst	Details removed	Contact Number Details removed
<b>Chair of Audit Risk &amp; Compliance:</b> Garry Wayling	Details removed	Contact number: Details removed
<b>Chair of the Human Resources Nomination and Remuneration Committee:</b> Stephen Knight	Details removed	Contact number: Details removed

**Table A – OneVue Holdings Limited Whistleblower Policy**

Disclosures which qualify as protected disclosures under the Corporations Act 2001 (“Corps Act”) <sup>3</sup>		
Question	Legislative reference	Requirement
What is a disclosure qualifying for protection?	S 1317AA	<ul style="list-style-type: none"> <li>▪ <b>Eligible Whistleblower:</b> When a Discloser is an eligible whistleblower in relation to a regulated entity; <b>and</b></li> <li>▪ <b>Recipients:</b> A disclosure is made to ASIC, APRA or a Commonwealth authority prescribed in relation to the regulated entity; or to an eligible recipient; <b>and</b></li> <li>▪ <b>Disclosable Matter</b></li> </ul>
Who is an Eligible Whistleblower?	S 1317AAA Corps Act	<p>A person who is:</p> <ol style="list-style-type: none"> <li>1. an officer of the regulated entity<sup>4</sup>; or</li> <li>2. an employee of the regulated entity; or</li> <li>3. an individual who has a contract for the supply of services or goods to a regulated entity; or</li> <li>4. an individual who is an associate<sup>5</sup> of the regulated entity; or</li> </ol> <p>For a regulated entity that is a <b>superannuation entity</b>:</p> <ol style="list-style-type: none"> <li>5. an individual who is a trustee, custodian or investment manager;</li> <li>6. an officer of a body corporate that is a trustee, custodian or investment manager of the superannuation entity;</li> <li>7. an employee of 1 or 2;</li> <li>8. A supplier of 1 or 2;</li> <li>9. An employee of 4;</li> </ol> <p>Or;</p> <ol style="list-style-type: none"> <li>10. A relative or a dependent of 1 to 9</li> </ol>
Who is an Eligible Recipient?	S 1317AAC Corps Act	<p>In order to be a protected disclosure in relation to a regulated entity that is a body corporate, the disclosure must be made to either an individual listed below in the regulated entity that is a body corporate or a related body corporate:</p> <ul style="list-style-type: none"> <li>▪ an officer or senior manager</li> <li>▪ An auditor; or a member of an audit team conducting an audit;</li> <li>▪ An actuary;</li> </ul>

## Strength in numbers

<sup>3</sup> Corporations Act 2001 (No. 50, 2001), Compilation No. 98 (25 March 2020), Includes amendments up to Act No. 22, 2020

<sup>4</sup> Section 1317AAB defines “Regulated Entity” as (a) a company; (b) a corporation to which paragraph 51(xx) of the Constitution applies; (c) an ADI (within the meaning of the Banking Act 1959), an authorised NOHC (within the meaning of that Act) or a subsidiary of an ADI or an authorised NOHC; (d) a general insurer (within the meaning of the Insurance Act 1973), an authorised NOHC (within the meaning of that Act) or a subsidiary of a general insurer or an authorised NOHC; (e) a life company (within the meaning of the Life Insurance Act 1995), a registered NOHC (within the meaning of that Act) or a subsidiary of a life company or a registered NOHC; (f) a superannuation entity or a trustee (within the meaning of the Superannuation Industry (Supervision) Act 1993) of a superannuation entity; (g) an entity prescribed by the regulations for the purposes of this paragraph.

<sup>5</sup> Section 11 defines “Associate” of a body corporate as (a) a director or secretary of the body; and b) a related body corporate and (a) director or secretary of a related body corporate.

		<ul style="list-style-type: none"> <li>▪ A person authorised to receive disclosures that may qualify for protection under this part (Part 9.4 AAA – Protection for whistleblower)</li> </ul> <p>Eligible Recipients in relation to a regulated entity that is a listed individual below in a superannuation entity:</p> <ul style="list-style-type: none"> <li>▪ an officer</li> <li>▪ an auditor or a member of an audit team conducting an audit;</li> <li>▪ an actuary;</li> <li>▪ an individual or a director of a body corporate that is the trustee                             <ul style="list-style-type: none"> <li>▪ a person authorised by the trustee or trustees to receive disclosures that may qualify for protection under this Part.</li> </ul> </li> </ul>
<p>What is a disclosable matter?</p>	<p>S 1317AA(4) and (5)</p>	<ul style="list-style-type: none"> <li>▪ Information is a disclosable matter if:                             <ul style="list-style-type: none"> <li>a Discloser has reasonable grounds to suspect that the information concerns misconduct, or an improper state of affairs or circumstances in relation to (a) the regulated entity or (b) if the regulated entity is a body corporate, a related body corporate of the regulated entity (S1317AA(4)); or</li> <li>a disclosure has a reasonable ground to suspect that the information indicates (a) the regulated entity, or an officer or employee of the regulated entity or (b) if the regulated entity is a body corporate, a related body corporate of the regulated entity, or an officer or employee of a related body corporate of the regulated entity has engaged in conduct that constitutes an offence against or a contravention of the laws<sup>6</sup> or constitutes an offence against any other laws of the Commonwealth punishable by imprisonment for a period of 12 months or more or represents a danger to the public or the financial system (S1317AA(5)).</li> </ul> </li> </ul>
<p>What protection does the Corporations Act provide to the person making the disclosure?</p>	<p>S 1317AAE, AB, AC, ADA</p>	<p>If a person makes a disclosure that qualifies for protection under the Act:</p> <ul style="list-style-type: none"> <li>▪ the person's identity is protected</li> <li>▪ the person is not subject to any civil, criminal or administrative liability (including disciplinary action) for making the disclosure; and</li> <li>▪ no contractual or other remedy may be enforced, and no contractual or other right may be exercised, against the person on the basis of the disclosure.</li> <li>▪ A contract to which the person is a party may not be terminated on the basis that the disclosure constitutes a breach of contract.</li> </ul> <p><b>IMPORTANT NOTE:</b> This does not mean that the person is not subject to any civil or criminal liability for their conduct that is revealed by the disclosure. Qualified privilege applies.</p> <ul style="list-style-type: none"> <li>▪ If the person making the disclosure is employed under a contract of employment and their employer purports to terminate the</li> </ul>

<sup>6</sup> (i) the Corporations Act, (ii) the ASIC Act; (iii) the Banking Act 1959 (iv) the Financial Sector (Collection of Data) Act 2001; (v) the Insurance Act 1973, (vi) the Life Insurance Act 1995; (vii) the National Consumer Credit Protection Act 2009; (viii) the Superannuation Industry (Supervision) Act 1993; (ix) an instrument made under an Act listed (i) to (viii).

		<p>contract of employment on the basis of the disclosure, the court may order that they be reinstated in that position or a position at a comparable level.</p> <ul style="list-style-type: none"> <li>■ It is a criminal offence to:             <ul style="list-style-type: none"> <li>– Engage in conduct with intent to cause detriment<sup>7</sup> to a person because that person or another person made a disclosure that qualifies for protection under the Act and the person actually suffers detriment.</li> <li>– Threaten to cause any detriment to another person because that person (or another person) makes, or may make, a disclosure that qualifies for protection under the Act. A threat may be express or implied, or conditional or unconditional.</li> </ul> </li> </ul> <p>(Note: If it is a company that causes or threatens to cause detriment, an officer or employee of the company that is involved in that offence also commits an offence. It is not necessary for the prosecution to prove that the person threatened actually feared that the threat would be carried out. It is sufficient if the person making the threat intended the person to fear, or was reckless as to whether the person would fear, that the threat would be carried out).</p>
<p>To whom can a person receiving a protected disclosure disclose the confidential information?</p>	<p>S 1317AE(2) Corps Act</p>	<p>A person to whom a protected disclosure is made, can disclose:</p> <ul style="list-style-type: none"> <li>■ the information that qualifies as a protected disclosure; or</li> <li>■ the identity of the Discloser or information that is likely to lead to the identification of the Discloser,</li> </ul> <p>to:</p> <ul style="list-style-type: none"> <li>■ ASIC; or</li> <li>■ APRA; or</li> <li>■ a member of the Australian Federal Police;</li> </ul> <p>a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operations of the Part<sup>8</sup> made to a person or body prescribed by the regulations for the purposes of the paragraph S1317AAE(2);</p> <ul style="list-style-type: none"> <li>■ someone else <b>with the consent of the Discloser</b>.</li> </ul> <p>To be clear, consent is <b>not</b> required if the disclosure is made to ASIC, APRA, or the AFP but consent <b>is required</b> to disclose to anyone else.</p>
<p>Compensation and other remedies</p>	<p>S 1317AD and AE Corps Act</p>	<p>A court may make any of the following orders in relation to a person who contravenes s 1317AC: (a) an order to compensate for loss, damages or injury suffered; (b) an order granting an injunction to prevent, stop, or remedy, (c) an order to apologise etc.</p>

## Strength in numbers

<sup>7</sup> Detriment includes (a) dismissal of an employee, (b) injury of an employee in his or her employment, (c) alteration of an employee's position or duties to his or her disadvantage; (d) discrimination between an employee and other employees of the same employer; (e) harassment or intimidation of a person; (f) harm or injury to a person, including psychological harm; (g) damage to a person's property; (h) damage to a person's reputation; (i) damage to a person's business or financial position; (j) any other damage to a person (S 1313ADA)

## Appendix 1: OneVue Holdings Limited Whistleblower Policy

Consent to disclosure of confidential information

By signing this form, I:

.....  
[Insert full name of person making the disclosure]

voluntarily consent to:

.....  
[insert name of person who has received the disclosure]

disclosing the following information to any or all of the nominated persons I have selected below for the purposes of investigating and/or taking any remedial action whatsoever and/or keeping me informed regarding the information I have disclosed:

**Information which can be disclosed (select by marking the box):**

- The facts and circumstances I have disclosed pursuant to the OneVue Holdings Limited Whistleblower Policy;
- My identity.

**The nominated persons I have selected to whom the information can be disclosed, and who may disclose the information to each other are the persons who hold these position(s):**

- The Managing Director of OneVue Holdings Limited
- The Chief Financial Officer of OneVue Holdings Limited
- The Group Chief Risk Officer of OneVue Holdings Limited
- The Head of People and Culture of OneVue Holdings Limited
- The Chairperson of the Board of OneVue Holdings Limited
- The Chair of the Audit Risk Management and Compliance Committee of OneVue Holdings Limited
- The Chair of the Human Resources Nomination and Remuneration Committee
- The Chairperson of the Board of  [insert name of OneVue subsidiary company]
- A director of  [insert name of OneVue subsidiary company]
- The auditor of OneVue Holdings Limited
- The auditor of  [insert name of OneVue subsidiary company]
- The auditor of  [insert name of relevant superannuation entity if the disclosure concerns that entity]
- The actuary of  [insert name of relevant superannuation entity if the disclosure concerns that entity]

OTHER:  [Insert position description or name of person]. If more than one, list them here:

## Declaration

- I understand that:
  - I cannot be required to give my consent to disclosure
  - The investigation of the facts and circumstances I have disclosed may be limited according to the consent to disclosure I have given
  - I may be asked on more than one occasion to provide consent to disclosure to other persons, as circumstances may require
- I declare that I have signed this consent to disclosure in the presence of the witness, entirely voluntarily and without any threat or undue influence exerted over me, or inducement held out to me, by anyone.

Signature

Name of witness

Signature of witness

Date

 /  /



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*Strength in numbers*