Policies & Procedures

Whistleblower Policy

Whistleblower Policy

Title

General Counsel

Policy Owner

4

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27 October 2022

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31 December 2023

Review Date

Kinrise.

Creating moments of joy through food.

1. Purpose of this Policy

Kinrise is committed to conducting its business ethically and in compliance with relevant legal and regulatory requirements. This Policy forms part of Kinrise's broader commitment to maintaining an open working environment. In line with this, Kinrise has created this Whistleblower Policy (**Policy**) to encourage individuals to make a report of any wrongdoing or misconduct in relation to Kinrise without fear of detriment.
This Policy is designed to operate consistently with the Kinrise Code of Business Conduct and Business Principles Policy (**Code**).

Kinrise is required to observe (and this Policy complies with) the requirements of any applicable legislation regarding the protection of whistleblowers, including those of the *Corporations Act* 2001 (Cth) (**Corporations Act**) and the *Taxation Administration Act* 1953 (Cth) (**Tax Act**).
This Policy also establishes a process to ensure that fair and independent investigation of any matters raised in accordance with this Policy is undertaken consistently and encourages appropriate responsive action where necessary.

To achieve this, Kinrise will endeavour to maintain good corporate governance practices and have proper arrangements in place (including via this Policy) to:

- provide a supportive working environment in which individuals feel comfortable to raise issues of legitimate concern to them and to Kinrise;
- enable individuals, including but not limited to Eligible Whistleblowers, to raise concerns about any misconduct or an improper state of affairs or circumstances;
- safeguard against the detriment of any person who makes a report of misconduct or an improper state of affairs or circumstances on reasonable grounds;
- outline how Kinrise will ensure fair treatment of employees mentioned in the disclosures;
- provide for the fair and independent investigation of alleged misconduct or an improper state of affairs or circumstances and to ensure appropriate follow-up where necessary.

2. Scope of this Policy

This policy, as amended from time to time, applies to all Eligible Whistleblowers who wish to report a Disclosable Matter in relation to Kinrise Pty Ltd or any of its related bodies corporate (as that term is defined in the Corporations Act) which include Greens General Foods Pty Ltd, Greens Biscuits Pty Ltd, Burst Foods Pty Ltd t/a Cobs Fine Foods, The Cake Syndicate Pty Ltd t/a Susan Day Cakes and OzPack Holdings Pty Ltd (together, **Kinrise**).

Any revisions to this Policy from time to time are available to officers and employees via Kinrise's external website and at http://kinriseoktosay.stoplinereport.com/.

3. Making a Protected Disclosure

The requirements for making a disclosure of information that qualifies for protection under the Australian statutory whistleblower protection regime in the Corporations Act or Tax Act (**Protected Disclosure**) are as follows:

(a) the disclosure must be made by an **Eligible Whistleblower** – refer to section 4 below for the definition of an Eligible Whistleblower;

(b) the disclosure must be about a **Disclosable Matter** – refer to section 5 for a description of a "disclosable matter"; and

(c) the disclosure must be made to an **Eligible Recipient** – refer to section 6(c) below for the definition of an Eligible Recipient.

4. Who is an Eligible Whistleblower?

An **Eligible Whistleblower** is anyone who is or has been:

(a) an officer of Kinrise;

(b) an employee of Kinrise;

(c) an individual who supplies services or good to Kinrise (whether paid or unpaid);

(d) an employee of a person that supplies services or good to Kinrise (whether paid or unpaid);

(e) an individual who is an associate1 of Kinrise; or

(f) either:

(i) in relation to the Corporations Act, a spouse or relative, dependent or dependent of a spouse of any of the individuals referred to in paragraphs (i) to (v) above; or

(ii) in relation to the Tax Act, a spouse, child, dependent, or spouse of a dependent, of any of the individuals referred to in paragraphs (i) to (v) above.

5. What is a Disclosable Matter?

If an Eligible Whistleblower becomes aware of any issue or behaviour that is a Disclosable Matter as defined by this Policy, they have a right to make a Protected Disclosure under the Australian whistleblower laws in accordance with the procedures set out in this Policy.

(a) **What is a <u>Disclosable Matter</u>?**

It is not possible to provide an exhaustive list of the activities which should be reported for the purpose of this Policy. Generally, a "Disclosable Matter" includes any conduct of any person connected with Kinrise, which an Eligible Whistleblower has reasonable grounds to suspect is:

(i) misconduct or an improper state of affairs or circumstances in relation to Kinrise or its operations or business practices;

(ii) an offence or contravention of the law punishable by imprisonment for 12 months or more;

(iii) a contravention of Commonwealth or State laws including (without limitation) the Corporations Act, the Australian Securities and Investments Commission Act 2001 (Cth), the Banking Act 1959 (Cth), the Financial Sector (Collection of Data) Act 2001 (Cth), the Insurance

[1] "*Associate*" has the meaning ascribed to that term under ss 10 to 17 of the *Corporations Act 2001* (Cth).

Act 1973 (Cth), the Life Insurance Act 1995 (Cth), the National Consumer Credit Protection Act 2009 (Cth) or the Superannuation Industry (Supervision) Act 1993 (Cth);

(iv) a danger to public safety or the stability of, or confidence in financial system;

(v) indicative of systemic issues, dishonest or unethical behaviour or practices;

(vi) conduct which constitutes “modern slavery” within the meaning given to that phrase under the *Modern Slavery Act 2018* (Cth); or

(vii) other conduct which causes harm, or has potential to cause harm to Kinrise or is prohibited by the Code.

Examples of a Disclosable Matter relevant to Kinrise could include disclosures about fraudulent activity, serious, unlawful or corrupt use of Kinrise 's funds or other resources, improper accounting or financial reporting practices or systemic practices that pose a serious risk to the health and safety of person on Kinrise's premises.
A disclosure of information that is not a Disclosable Matter will not qualify for protection under this Policy or the Corporations Act (or the Tax Administration Act, where relevant).

(b) **What is <u>not</u> a Disclosable Matter?**

This Policy is intended for disclosures of information that have significant implications for Kinrise, rather than for personal matters.
This Policy does not, therefore, apply to trivial or vexatious matters. Nor is this Policy intended to replace or be used instead of other Kinrise company policies and reporting procedures such as those relating to dispute resolution, personal work-related grievances (including matters relating to the discloser's employment or having implications for the discloser personally), equal opportunity, discrimination, harassment or bullying see s.1317AADA(2) of the Corporations Act for further examples of personal work-related grievances and the Kinrise Grievance Policy available via the People and Brand **Policies & Procedures page** on Konnections.

Personal work-related grievances

Personal work-related grievances are those about any matter in relation to the discloser's employment, or former employment, having implications for the discloser personally but not having significant implications for Kinrise. Such grievances will generally not be Disclosable Matters and will therefore generally not qualify for protection under this Policy or the Corporations Act. Examples of personal work-related grievances include interpersonal conflicts between the discloser and another employee, and decisions about the terms of employment, transfer, promotion, suspension or termination of the discloser.

Kinrise takes personal work-related grievances seriously. However, they should generally be raised with the discloser’s line manager, the GM People & Culture or People & Culture Business Partner.

Personal work-related grievances may qualify for protection in certain circumstances, such as:

- where the disclosure also includes information that is a Disclosable Matter (ie. a mixed report);
- where the disclosure reasonably indicates a breach of employment or other laws punishable by imprisonment for a period of 12 months or more;
- where a discloser seeks legal advice or representation about the operation of the whistleblower protections under the Corporations Act - that communication with lawyers is protected;
- where the discloser suffers from or is threatened with detriment for making a disclosure, whether the disclosure is actually a Protected Disclosure - the discloser is entitled to protection against detriment.

The Kinrise Head of Legal, Risk & Compliance will determine in each case, acting reasonably, whether or not a reported matter is a Disclosable Matter in accordance with this Policy.
Accordingly, a disclosure or part of a disclosure which is not, or determined by Kinrise not to be, a Disclosable Matter may not be protected by the Corporations Act or the terms of this Policy.

False reporting

This Policy applies to disclosures where the discloser has objectively reasonable grounds to suspect Misconduct or an Improper state of affairs or circumstances in relation to Kinrise or its operations. A disclosure may still qualify for protection even if it turns out to be inaccurate. However, where it is shown that a person purporting to be a whistleblower has knowingly or recklessly made a false report of wrongdoing, then that conduct itself will be considered a serious matter and that person may be subject to disciplinary action in accordance with the Kinrise Disciplinary Policy, which may include dismissal in serious cases.

6. How to make a Protected Disclosure

(a) An Eligible Whistleblower who reports a Disclosable Matter (a **Whistleblower**) under this Policy should take steps to ensure that the report is:

- (i) factually accurate;
- (ii) supported by documentary evidence where available; and
- (iii) based on reasonable grounds to suspect that the information disclosed indicates misconduct or an improper state of affairs or circumstances.

(b) Individuals wishing to make a disclosure can obtain information about the process and protections relating to whistleblowing before making a disclosure by contacting GM People & Culture or a People & Culture Business Partner.

(c) Who is an **Eligible Recipient** of a disclosure?

In order to qualify for protection, the disclosure must be made directly to an Eligible Recipient. Kinrise offers several reporting options for making a disclosure internally as well as externally. Protections apply to internal as well as external disclosures. The role of Eligible Recipients is to receive disclosures that qualify for protection.

(External reporting service) A disclosure may be made to by contacting the Kinrise Ok to Say Hotline, which is an independent service run by Stopline, on **1300 30 45 50** or **http://kinriseoktosay.stoplinereport.com/** or email to **kinriseoktosay@stopline.com.au**.

- The recipient will, subject to compliance with confidentiality requirements, provide details of the disclosure to the Kinrise Corporate Counsel within Kinrise.

- A report may be submitted anonymously if the Whistleblower does not wish to disclose their identity to the Kinrise Ok to Say Hotline.

(***Officer or senior manager of Kinrise***) Disclosures may also be made to an officer or senior manager[2] of Kinrise or of a related body corporate. The Eligible Recipients who have been principally nominated or authorised by Kinrise to receive such reports are Kinrise Head of Legal, Risk & Compliance, or if the matter concerns the CEO, to the Chairman of the Board. These Eligible Recipients' contact details are published on Kinrise's external website.

[2] An "officer" or senior manager includes the director or company secretary of a company, a person who makes or participates in the making of decisions that affect the whole, or a substantial part, of the business of the company and a person who has the capacity to significantly affect the company's financial standing.

However, if the Whistleblower feels uncomfortable reporting a matter to one of the above persons, a disclosure may also be made to any other officer or senior manager of Kinrise or of its related bodies corporate. For disclosures under the Tax Act, a Whistleblower may also make a disclosure to:

- any other employee or officer of Kinrise who has functions or duties that relate to the tax affairs of Kinrise; or
- a registered tax agent or BAS agent who provides tax agent services or BAS services to Kinrise.

(***Auditor***) Whistleblowers may also make a disclosure to internal or external auditors (including any member of the audit team) or actuaries of Kinrise.

(***Relevant regulator***) While Kinrise encourages Whistleblowers to make disclosures internally, disclosures may also be made to the Australian Securities and Investments Commission (ASIC), the Australian Prudential Regulation Authority (APRA), the Australian Taxation Office (ATO) or another Commonwealth body prescribed by regulation (the **Regulator**). Disclosures made to the Regulator will be Protected Disclosures.
(***Lawyer***) Under the Corporations Act and the Tax Act, any disclosure of information, including information that does not relate to a Disclosable Matter, made to a lawyer for the purpose of obtaining legal advice or legal representation in relation to the discloser's rights at law will also be a Protected Disclosure.

(***Public interest disclosure***) In certain circumstances, 90 days after a Whistleblower has made a report in accordance with this Policy to the Regulator, and provided that the Whistleblower has reasonable grounds to believe that:

- no action is being, or has been, taken to address the matters the Whistleblower raised in his/her report; and
- the making of a further disclosure would be in the public interest,

the Whistleblower may disclose the matter to a member of Parliament or a journalist.
Such a step is a serious matter and, to ensure the Whistleblower is protected by law, the Whistleblower should seek independent legal advice before taking any such step. A public interest disclosure qualifies for protection under the Corporations Act only.

(***Emergency disclosure***) In certain circumstances and provided the Whistleblower has:

- made a disclosure to the Regulator in accordance with this Policy;
- reasonable grounds to believe that the information concerns a substantial and imminent danger to health or safety of one or more persons or to the natural environment; and
- given notice to the same Regulator about his/her intention to make an emergency disclosure,
- the Whistleblower may disclose the matter to a member of Parliament or a journalist.

Such a step is a serious matter and, to ensure the Whistleblower is protected by law, the Whistleblower should seek independent legal advice before taking any such step. An emergency disclosure qualifies for protection under the Corporations Act only.

(***Anonymous disclosures***) A disclosure can be made anonymously to any of the Eligible Recipients listed above or to the Kinrise Ok to Say Hotline and still be protected by this Policy and the Corporations Act. However, this may make it difficult to investigate the disclosed matter. Kinrise encourages disclosers wishing to make an anonymous disclosure to do so to the Kinrise Ok to Say Hotline, this will ensure the Whistleblower’s identity can remain anonymous and provide Kinrise with the ability to properly investigate the disclosure and a confidential communication channel through which questions can be asked and information provided.

7. Investigation of Protected Disclosures

(a) Investigation of a Protected Disclosure

All Protected Disclosures covered by this Policy will be taken seriously and handled sensitively and fairly. Kinrise will generally direct the matter to the Kinrise Head of Legal, Risk & Compliance, or if the matter concerns the CEO, to the Chairman of the Board, who will attempt to ensure all Protected Disclosures are investigated as soon as reasonably practicable. Where appropriate the Whistleblower will be kept informed as to the progress of the investigation.
Kinrise will investigate Protected Disclosures covered by this Policy in an objective, fair and appropriate manner, depending on the circumstances of each disclosure. Kinrise reserves the right to use both internal and external resources to investigate a Protected Disclosure or part of it.

Assessment

As a first step in the investigation process, normally Kinrise will assess a disclosure to determine whether or not it falls within the scope of this Policy. If it does, the following steps will normally apply to the investigation. If it does not, the matter will not be investigated, and the discloser will be advised of that fact and may be directed to another appropriate person or section within the organisation such as GM People & Culture.
For Protected Disclosures assessed to be within the scope of this Policy, Kinrise will advise the Whistleblower of the support available to the Whistleblower and emphasise to the Whistleblower the importance of confidentiality.

Where the Protected Disclosure is not an anonymous disclosure, Kinrise will ask the Whistleblower if the Whistleblower consents to the disclosure of their identity for the purposes of the investigation. Kinrise will explain to the Whistleblower the steps Kinrise has in place to take all reasonable steps to reduce the risk that the Whistleblower will be identified as the result of the disclosure. If the Whistleblower consents, Kinrise will keep a written record of that consent. If the Whistleblower does not consent, Kinrise will also record that fact and advise the Whistleblower that Kinrise will not disclose the identity of the Whistleblower.

In circumstances where consent has not been provided, Kinrise will advise the Whistleblower that it may disclose information that is not the identity of the Whistleblower where it is reasonably necessary for the investigation and where all reasonable steps have been taken to reduce the risk the that the Whistleblower will be identified as a result of the disclosure. Reasonable steps Kinrise may take include redacting personal information likely to lead to identification, storing records securely, and providing Eligible Recipients, persons undertaking investigations and others with appropriate regular education and training on their obligations. Whistleblowers who wish to remain anonymous can refuse to answer questions they feel could reveal their identity.

Investigation Steps

As a general guide and subject to the particular circumstances applying to the Protected Disclosure, the steps in the investigation process are normally expected to include the following (but are not limited to):

- interview the Whistleblower to obtain relevant information;
- interview any alleged wrongdoer to obtain a response to the Protected Disclosure in so far as it relates to the alleged wrongdoer;
- interview any relevant witnesses regarding relevant matters arising from the Protected Disclosure;
- review any documents or other material relevant to the Protected Disclosure;
- if necessary, conduct further interview/s with the Whistleblower to obtain further information or a response to material arising from the investigation; and

- if necessary, conduct further interview/s with any alleged wrongdoer regarding further material arising from the investigation.

All relevant material including interviews and documents obtained during the investigation is then considered and a report prepared.
The report will make findings of fact and determine whether a Protected Disclosure has been substantiated or not substantiated, in whole or part. The report may also include recommendations arising from any factual findings.

Timing

Kinrise aims, where practicable, to finalise investigations of Protected Disclosures within 90 days of the date the disclosure is first made. Where finalisation is not practicable, however, Kinrise will take all reasonable steps to ensure that significant progress is made in relation to a disclosure within 90 days of the date the Protected Disclosure is first made.

Kinrise will take reasonable steps to keep the Whistleblower informed (including through confidential communication channels used) of the progress of an investigation of their disclosure. The frequency of updates and timeframe will vary according to the nature of the Protected Disclosure.

(b) **Response to findings**

A response to any substantiated allegations of Misconduct or an Improper state of affairs or circumstances may include disciplinary action, up to and including the termination of an individual’s employment or engagement with Kinrise, in accordance with Kinrise’s disciplinary procedures and/or a referral to an external body, including ASIC or a law enforcement authority as appropriate.

The CEO will also consider any steps available to Kinrise to rectify the effects of any Misconduct or an Improper state of affairs or circumstances or measures available to the organisation that may be implemented to safeguard against the same or similar Misconduct or an Improper state of affairs or circumstances occurring in the future.

Where allegations of Misconduct or Improper state of affairs or circumstances are made against another person cannot be substantiated, that person will be advised accordingly and, unless Kinrise determine otherwise, will be entitled to continue in their role as if the allegations had not been made.
In the case of a matter involving the CEO, the above steps will be handled by the Chairman of the Board.

(c) **Notification of the outcome**

Once an investigation is completed and the matter (including any subsequent disciplinary action) has been concluded, Kinrise will take steps to notify the Whistleblower that the matter has been finalised.
Kinrise may notify the Whistleblower of the outcome, including whether some or all of the allegations are substantiated. However, this will not necessarily be appropriate in all instances, including where information disclosed by the outcome is confidential, legally privileged and/or where Kinrise is bound by a law or agreement that prevents such disclosure being made.

Where appropriate, the Whistleblower will be informed of the outcome of the investigation.

(d) **Fair treatment**

Kinrise will ensure fair treatment of any Kinrise team member mentioned or implicated in a Protected Disclosure within the meaning of this Policy or to whom such disclosure relates (**Relevant Team Member**) by applying the following principles.

Confidentiality

To the extent practicable, the identity of a Relevant Team Member will be kept confidential during the investigation of a Protected Disclosure relating to that person.

Impartiality

An investigator appointed to investigate a Protected Disclosure will act impartiality and without bias in conducting the investigation. An investigator must declare any material personal interest the investigator has in any matter relevant to the investigation for which the investigator has responsibility immediately to Kinrise. The investigator must then take no further part in the investigation unless directed otherwise (other than to provide relevant material or information by way of a handover to a new investigator or to take any necessary incidental action for that purpose).

Fair process

An investigation into a Protected Disclosure will follow a fair process including:

- informing a Relevant Team Member of the substance of a Protected Disclosure, as far as it applies to the Relevant Team Member;
- giving a Relevant Employee a reasonable opportunity to respond to any matter referred to above, before the investigation is finalised;
- informing a Relevant Team Member of any adverse finding directly affecting the Relevant Team Member arising out of the investigation; and
- giving a Relevant Team Member a reasonable opportunity to respond to any such adverse finding before the report is finalised.

Any potential disciplinary action against a Relevant Team Member arising out of or as a result of an adverse finding in an investigation report under this Policy will be dealt with consistently with the Kinrise Disciplinary Policy.

Support

Relevant Team Member will have reasonable access to support made available by Kinrise such as contact with a nominated person and, where relevant, access to Kinrise's Employee Assistance Program (**EAP**) or similar counselling service. Kinrise will consider any request for other support for a Relevant Team Member on a case by case basis.

8. Confidentiality and Protection of Whistleblowers

If an Eligible Whistleblower makes a Protected Disclosure under the Australian whistleblower laws, the following legal protections will apply:

(a) **Confidentiality of Identity**

Where a Whistleblower reports an instance of alleged Misconduct or an Improper state of affairs or circumstances under this Policy, his or her identity will not be disclosed unless it is:

- consented to by the person making the report;
- required by law;
- necessary to prevent or lessen a serious threat to another person's health or safety;

- disclosed to a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of whistleblowing legislation;
- made to any government authority or agency or any regulator which Kinrise reports to for the purpose of reporting the Protected Disclosure; or
- made to a member of the Australian Federal Police for the purpose of reporting the Protected Disclosure.

Where Kinrise makes disclosures of information not including the identity of the Whistleblower, which are reasonably necessary for the purpose of investigating the alleged Misconduct or an Improper state of affairs or circumstances to which the Whistleblower's report related, Kinrise will take all reasonable steps to reduce the risk that the identity of the Whistleblower will be identified.

Kinrise will also ensure that any records relating to a report of Misconduct or an Improper state of affairs or circumstances are stored securely and are able to be accessed only by authorised personnel on a "need to know" basis.

The following unauthorised disclosures will be regarded as a disciplinary matter and Misconduct or an Improper state of affairs or circumstances within the meaning prescribed by this Policy, and will be dealt with in accordance with the Kinrise Disciplinary Policy:

- Unauthorised disclosure of the identity of the Whistleblower who has made a report of unacceptable conduct, or
- Unauthorised disclosure of information from which the identity of the Whistleblower could likely be inferred.

(b) **Protection from detriment**

Kinrise will not tolerate any action done in detriment to a Whistleblower, in reprisal for him or her making a report of Misconduct or an Improper state of affairs or circumstances or to that person's colleagues, relatives or against any other person named in the report or any person investigating the matter.
Detrimental actions include, but are not limited to:

- dismissal of a team member;
- injury of a team member in his or her employment;
- alteration of a team member's position or duties to his or her disadvantage;
- discrimination between a team member and other Kinrise team members;
- harassment or intimidation;
- physical or psychological harm;
- damage to a person's property;
- damage to a person's reputation;
- damage to a person's business or financial position; and
- any other damage to a person.

Kinrise will provide education and training for Eligible Recipients, person undertaking investigations of disclosures and other officers and employees to help them understand their obligation to protect Whistleblowers from detriment.

An Eligible Whistleblower who is subjected to detrimental treatment should inform an officer or senior manager immediately. If the matter is not remedied, it should be disclosed in line with this Policy where it will be dealt with as a separate matter.
Any such reprisal action or victimisation may constitute Misconduct or an Improper state of affairs or circumstances under this Policy, and/or serious misconduct in employment, and will be dealt with in accordance with the Kinrise Disciplinary Policy and/or referred to a relevant law enforcement authority as appropriate.

However, this Policy will not protect Whistleblowers from any consequences if they are also involved in or connected to the Misconduct or an Improper state of affairs or circumstances that is being reported or they act other than with reasonable grounds for doing so.

In certain circumstances, a Whistleblower (or any other team member or person) can seek compensation and other remedies through the courts if:

- they suffer loss, damage or injury because of a disclosure; and
- Kinrise failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

(c) **Other protections available to Whistleblowers:**

Where a Whistleblower reports an instance of alleged Misconduct or an Improper state of affairs or circumstances in accordance with this Policy, he or she Is entitled to the following protections:

- protection against civil, criminal or administrative liability (including disciplinary action) for making the disclosure;
- no contractual or other remedy may be enforced, and no contractual or other right may be exercised, including rights of termination of his or her employment, on the basis of the disclosure;
- information disclosed under this Policy is not admissible in evidence against the Whistleblower in any prosecution, other than in respect of providing false information; and
- victimisation because of a Protected Disclosure is a criminal offence and if an Eligible Whistleblower suffers damage because of such victimisation, he or she can claim compensation for that damage from the offender.

However, a Whistleblower can still be pursued for having made a false disclosure and in connection with the discloser's own conduct which is revealed by the matters highlighted in the disclosed information (eg. the discloser's own conduct in the Misconduct or an Improper state of affairs or circumstances which are revealed by the Protected Disclosure).

(d) **Support for Whistleblowers**

In addition to the protections provided in this policy, Kinrise will determine the support to be provided to Whistleblower's on a case-by-case basis, depending on the particular circumstances. Such support may include steps such as:

- providing counselling through Kinrise’s Employee Assistance Program or otherwise;
- identifying a specific person or persons to communicate with the Whistleblower, co-ordinate action or take other appropriate steps; and

- assessing and controlling the risk of detriment to the Whistleblower.

9. Corporate Governance Reports

Reports will be prepared which contain a general summary of the number and type of incidents identified or complaints received through Kinrise's internal reporting processes, together with a description of the nature and results of any investigation conducted as a result of a reported incident or complaint.

All summary reports will be to the CEO or a delegate on a regular basis as determined by the CEO. A consolidated report will be provided to the Board annually.

In the compilation of these reports, the identity of the Whistleblower will not be disclosed. Kinrise should also have regard to whether the description of the conduct itself will enable the Whistleblower to be identified and take steps to reduce or eliminate the likelihood of this occurring.

10. Implementation of this Policy

The Board will have regard to any reports and investigations conducted in accordance with this Policy to monitor and review regularly the effectiveness of the protection programme described in this Policy.

11. Access to this Policy

Kinrise Ok to Say Hotline can be accessed at website is **http://kinriseoktosay.stoplinereport.com.**

12. Related Documents

- Kinrise code of conduct and business principles;
- Kinrise Disciplinary Policy;
- Kinrise Grievance Policy.

These documents can be accessed via the People and Brand **Policies & Procedures page** on Konnections.

13. Document Variations

Version	Date	Author(s)	Changes Made
1.0	15 May 2019	Corporate Counsel	Document Creation
2.0	12 Dec 19	Corporate Counsel	Review
3.0	17 Feb 2022	Legal Counsel	Review and amendment of sections 3, 4, 5 and 6. Other amendments, taking into account ASIC's RG 270
4.0	27 October 2022	General Counsel with external counsel Addison's	Amendments to align with modern slavery provisions