

Whistleblower Policy

1. POLICY STATEMENT

Lung Foundation Australia “LFA” is committed to fostering a culture of integrity, transparency, and accountability. We encourage employees, contractors, and stakeholders to report any misconduct, unethical behaviour, or breaches of the law. This whistleblower policy outlines the procedures and protections for individuals who report such concerns in good faith.

2. PURPOSE

The purpose of this policy is to:

- Encourage the reporting of suspected misconduct, unethical practices, or legal breaches.
- Provide a clear framework for reporting and investigating allegations.
- Ensure that individuals who make reports in good faith are protected from retaliation.
- Comply with the Fair Work Act 2009 and the Corporations Act 2001.

3. SCOPE

This policy applies to all employees, volunteers, members, contractors, suppliers, consultants, and any other parties engaged with our company, both past and current.

4. REPORTABLE CONDUCT

Reportable conduct under this policy includes, but is not limited to:

- Fraud, corruption, or bribery.
- Illegal activities or breaches of the law.
- Mismanagement, serious misconduct, or improper behaviour.
- Violations of company policies or procedures.
- Unsafe work practices or environmental hazards.
- Retaliation against individuals who report conduct under this policy.

5. WHAT IS NOT REPORTABLE CONDUCT

While we encourage the reporting of misconduct, it is important to clarify that certain issues do not fall under the scope of this whistleblower policy. These include:

- Personal work-related grievances. These are issues that are solely related to an individual's employment and do not have significant implications for the organization, such as interpersonal conflicts, decisions relating to employment transfers, promotions, or disciplinary actions.
- Matters that have already been addressed under other formal grievance or dispute resolution processes.
- Concerns that are based on unsubstantiated rumours or that do not have sufficient evidence to support a report of misconduct.

6. REPORTING MECHANISMS

Reports can be made through the following channels:

- Internal Reporting: Employees are encouraged to report concerns to their immediate supervisor or manager, or the Senior Manager, People and Culture.
- Escalation is available to the CEO, Chair of the LFA Board or LFA's auditors

- **External Reporting:** Reports can also be made to external regulatory bodies, such as the Fair Work Ombudsman or the Australian Securities and Investments Commission (ASIC), as appropriate under the Fair Work Act and the Corporations Act.

When making a complaint, it is essential to provide detailed and accurate information to facilitate a thorough investigation. Please ensure your complaint includes the following:

- **Dates:** Specify the dates and times when the alleged misconduct occurred.
- **Location:** Mention the location(s) where the incident(s) took place.
- **Individuals Involved:** Identify the persons involved in the incident, including witnesses, if any.
- **Description of the Misconduct:** Provide a clear and concise description of the events or actions that constitute the misconduct.
- **Evidence:** Attach any relevant evidence, such as documents, emails, or photographs, that support your complaint.
- **Impact:** Explain the impact of the misconduct on you, other individuals, or the organisation.

Clearly articulating these details helps ensure that the investigation can proceed effectively and that appropriate actions can be taken.

7. CONFIDENTIALITY

All reports will be treated with the utmost confidentiality. The identity of the whistleblower will not be disclosed without their consent, except where required by law.

8. PROTECTION AGAINST RETALIATION

The company will not tolerate any form of retaliation against individuals who report concerns in good faith. Retaliation includes, but is not limited to, dismissal, demotion, harassment, or discrimination. Any individual found to have engaged in retaliatory behaviour will be subject to disciplinary action.

9. INVESTIGATION AND RESOLUTION

All reports of misconduct will be promptly and thoroughly investigated. The investigation process will be fair, objective, and conducted by an independent party where necessary. Findings and outcomes of the investigation will be communicated to the whistleblower, where appropriate, and necessary corrective actions will be taken.

The investigation process will include:

1. **Receipt of Report:** The report of misconduct is received and logged confidentially.
2. **Preliminary Assessment:** An initial assessment to determine if the report warrants a full investigation, and whether it's necessary to appoint an independent party.
5. **Data Collection:** Gathering of all relevant evidence, including documents, emails, and interviews with involved parties.
6. **Analysis:** Thorough analysis of the collected evidence to determine the facts.
7. **Conclusion:** Completion of a report summarising findings and outcomes.
8. **Communication:** Findings and outcomes are communicated to the whistleblower, where appropriate.
9. **Corrective Actions:** Necessary corrective actions are taken based on the process findings.
10. **Follow-Up:** Ensuring that corrective actions are implemented and monitoring for retaliation against the whistleblower.

10. RESPONSIBILITIES

Employees: Report any known or suspected misconduct or unethical behaviour.

Managers and Supervisors: Support and protect whistleblowers and ensure that reports are escalated appropriately.

Whistleblower Protection Officer (Senior Manager, People and Culture): Oversee the implementation of this policy, ensure investigations are conducted, and provide support to whistleblowers.

11. REVIEW AND AMENDMENT

This policy will be reviewed regularly to ensure its effectiveness and compliance with legal requirements. Any amendments will be communicated to all employees and stakeholders.