

Whistleblowing Policy

ST is committed to community standards, expectations and relevant legal and ethical guidelines in relation to professional behaviour. We will not tolerate unethical, unlawful or undesirable conduct and are committed to protection of our integrity, values, staff welfare and business relationships. ST encourage a corporate culture supporting and valuing the reporting of improper conduct, corruption and serious waste.

ST recognises that the most common method of detecting improper conduct is by notification of the improper conduct by its own employees. ST is committed to maintaining an environment in which all staff and contractors are able to report to their manager, without fear of retaliatory action, concerns about any serious instances of improper conduct that they believe may be occurring. If necessary reports can also be made anonymously through ST's independent, impartial whistleblowing service.

Whistleblowing can be defined as: the deliberate, voluntary disclosure of individual or organisational improper conduct by a person who has or had privileged access to data, events or information about an actual, suspected or anticipated improper conduct or wrongdoing within or by an organisation that is within its ability to control.

Improper conduct covered by the policy includes any conduct that is:

- dishonest, fraudulent or corrupt;
- illegal, such as theft, drug sale or use, violence, harassment, criminal damage to property or other breaches of state or federal legislation;
- wilful breach of ST's code of conduct;
- unethical, such as dishonestly altering company records, engaging in questionable accounting practices;
- misusing information technology such as IT equipment, social media sites or data phones;
- potentially damaging to ST or an ST employee, such as unsafe work practices or substantial wasting of resources;
- may cause financial loss to ST or damage its reputation or be otherwise detrimental to ST's interests;
- involving any other kind of serious impropriety; or
- an intent or preparation to commit any of the above.

Any individual who detects or has reasonable grounds for suspecting improper conduct is expected to raise concerns with their manager or the Human Resources Manager. However ST understands that circumstances may exist where a person does not feel comfortable in reporting this way or believe their concerns have not been adequately addressed or not addressed impartially. In these cases the organisation has engaged the services of an experienced independent, impartial whistleblowing service (STOPline Pty Ltd) where disclosures can be made, anonymously if required. Reporters will be protected from retaliation of any form.

Contacting STOPline

STOPline have several methods of receiving a disclosure although a telephone call is preferred so that sufficient information can be obtained to enable the conduct of an appropriate investigation. STOPline do not have incoming or outgoing caller ID.

Telephone

Toll Free – 1300 30 45 50

Locked Bag Mail

STA

C/- STOPline

Locked Bag 8
Hawthorn VIC 3122

Facsimile

STA
C/- STOPline
(03) 9882 4480

Email

specialisedtherapeutics@stopline.com.au

On-line

<https://specialisedtherapeutics.stoplinereport.com>

Disclosures to STOPline will be handled by a trained interviewer, anonymity and confidentiality will be maintained and all reports prepared by STOPline will be forwarded to the Human Resources Manager.

Confidentiality / Privacy

If a person makes a report of alleged or suspected improper conduct under this policy ST will endeavour to protect that person's identity from disclosure. Identifying information will be restricted to a need to know basis. ST will not disclose the person's identity unless:

- the person making the report consents to the disclosure;
- the disclosure is required or authorised by law;
- in some circumstances the disclosure is necessary to further the investigation.
- in each circumstance the matter has been discussed with the person making the disclosure before any identifying information is provided.

Reports made under this policy will be treated confidentially. However, when a report is investigated it may be necessary to discuss the allegations with people such as other ST personnel, external persons involved in the investigation process and, in appropriate circumstances, law enforcement agencies. Unauthorised disclosure of any information relating to a report will be regarded seriously and may result in disciplinary action, which may include dismissal.

Investigation

All reports of alleged or suspected improper conduct made under this policy will be properly assessed by the Human Resources Manager and if appropriate, will be independently investigated in a timely manner with the objective of locating evidence that either substantiates or refutes the claims made by the whistleblower. At the end of the investigation, the investigating officer will report their findings to the Human Resources Manager and the CEO who will determine the appropriate response. This response will include rectifying any unacceptable conduct, implementing any necessary organisational change and taking any corrective action required to prevent any future occurrences of the same or similar conduct. Where the person making the disclosure has identified themselves, the complainant will be advised of the result of the investigation ensuring confidentiality is maintained.