Whistleblower Policy

Bethanie

Last updated:
May 2025

Purpose

This policy documents Bethanie Group Inc and Bethanie Housing Limited's (collectively referred to as 'Bethanie') commitment to a safe trusting environment for all employees, volunteers, contractors, officers and other stakeholders, where concerns can be raised regarding actual or suspected contravention without fear of reprisal.

Scope and Applicability

This policy does not exhaustively set out all of the protections afforded to Whistleblowers under legislation, nor all of the circumstances in which a person will receive those protections. Please refer to the relevant legislation for more information, such as Part 9.4AAA of the Corporations Act 2001 (Cth).

Policy Objectives

The aim of the policy is to create an environment of trust, where all personnel are able to report an issue, which they genuinely believe on reasonable grounds has contravened Bethanie's Code of Conduct, policies or the law. It provides guidance on how any reported misconduct or unethical behaviour will be identified and dealt with.

Bethanie is committed to:

- Ensuring employees demonstrate the highest standard of ethical, legal, and moral behaviour in the conduct of their duties and responsibilities that align with Bethanie's Code of Conduct and Bethanie Behaviours.

- Providing adequate protection to employees who report incidents, and creating a climate of trust, where incidents can be reported and investigated without fear of retribution, as part of Bethanie's duty of care.
- Encouraging the reporting of issues of legitimate concern, and maintaining a systematic process for investigating, addressing, and reporting back on any breaches in a fair and equitable manner.
- Ensuring the privacy and confidentiality of those involved are maintained at all times.
- Meeting all obligations under the Aged Care Amendment (Security & Protection) Act 2007 (Cth) with respect to compulsory reporting, and protection for employees who report such incidents.
- Clearly communicating the objectives of this policy and supporting procedures, so that all employees are aware of the process, roles, and responsibilities, with respect to reporting a suspected or actual breach.
- Offering counselling and support services to impacted employees to ensure their mental health and wellbeing are looked after.
- Undertaking regular reviews of this policy and supporting procedures to ensure compliance with the relevant legislation, and to identify opportunities for continuous improvement.

Policy Principles

Bethanie has a Code of Conduct based on the Bethanie Behaviours, aged care legislative requirements and general practices, which have been developed to ensure high standards of conduct, clinical care, and ethical behaviour in all activities.

Bethanie is committed to continue developing its culture of safety to ensure all employees are encouraged to report any genuine matters or behaviours that they have reasonable grounds to believe or know contravene Bethanie's Code of Conduct, practices, or the law.
This policy protects those who have reasonable grounds to suspect or are aware that the information disclosed about the organisation, its employees or officers is in regard to:

- Misconduct
- Legal breaches, and/or
- Represents a danger to the public or financial system

How to make a report

Bethanie maintains an independent service to support the reporting of whistleblower disclosures and the anonymity of Disclosers. Reports can therefore also be made externally from the organisation by contacting:

- By mail: The FairCall Manager KPMG Forensic PO Box H67 Australia Square Sydney NSW 1213
- On-line: https://www.kpmgfaircall.kpmg.com.au/Bethanie
- or by phone: 1800 500 965

If the concern relates to the conduct of the Chief Executive Officer or any other matter, then it can be raised directly with the Chair of the Risk and Assurance Committee and/or the Board Chair via email: whistleblower@bethanie.com.au. The email will be automatically forwarded to those parties. Matters can also be raised directly via post with the envelope to be marked 'Private and Confidential' and addressed to the Board Chair and/or the Risk and Assurance Committee, Chair, Bethanie, PO Box 143, Northbridge WA 6865.

This is not an exhaustive list and matters can be reported to anyone identified in the legislation, Part 9.4AAA of the Corporations Act 2001 (Cth).

How the matter will be investigated

The individual to whom the Whistleblower makes a report will identify an investigating officer. While the unique circumstances of the report may require different investigation steps the investigation process will:

- Follow a fair process
- Be conducted as quickly and efficiently as the circumstances permit
- Determine if there is enough evidence to substantiate the matters reported
- Be independent of any person or persons concerned with the allegation

The process will also allow fair treatment of any individuals who are the subject of a report.

- Reports will be handled confidentially
- Matters reported will be assessed and may be subject to an investigation
- There will be a presumption of innocence until the outcome of the investigation is determined
- The purpose of the investigation is to determine if there is enough evidence to substantiate the matters reported

Bethanie will notify the Whistleblower once an investigation is complete but may not be able to disclose the particular details or the outcome of the investigation.

Protection and Support

Bethanie is committed to taking all reasonable steps to protect all Whistleblowers from detriment because of making a report that is in line with this policy. Part 9.4AAA of the Corporations Act 2001 (Cth) provides protection for Whistleblowers, including provisions to prevent victimisation for anyone making a report in good faith. A report maybe made confidentially, and all steps will be taken to protect confidentiality to the extent permitted by law.

Employees and their immediate family members may access confidential support through Bethanie's Employee Assistance Program.

Consequences of Policy Breach

- This policy is binding on Bethanie employees, as per Scope and Applicability.
- A breach of this policy may, in some circumstances, result in disciplinary action.