

Whistleblower Policy BP33

Purpose

P33.1	Community First is committed to fostering a culture of honest and ethical behaviour. Community First recognises the importance of ensuring a safe, supportive and confidential environment where people feel confident about reporting wrongdoing and are supported and protected throughout the process. This process supports Community First's focus on responding to concerns raised and evidences a culture of improvement. This policy is developed in line with the provisions of the Whistleblower protection regime of the Corporations Act 2001, Pt 9.4AAA and ASIC Regulatory Guide RG 270 – Whistleblower policies.
P33.2	This Policy establishes the minimum requirements for: ■ encouraging, supporting and promoting the appropriate raising of misconduct; ■ ensuring Community First has independent, confidential and objective reporting and investigation mechanisms so that people, acting honestly, ethically and with genuine concern are able to raise concerns of misconduct without fear of reprisal; ■ ensuring protections and protocols are in place to support people who raise concerns of misconduct; ■ conducting fair, unbiased, evidence-based investigations in order to substantiate or refute claims of misconduct; ■ implementing a robust and trusted framework for escalating and addressing claims of misconduct; ■ helping to deter wrongdoing generally.
P33.3	This Policy will be approved by the Board and will be reviewed as required and no less frequently than annually.

Definitions

P33.4	Disclosable matter A disclosable matter refers to: ■ the disclosure of information that relates to concerns of misconduct or an improper state of affairs or circumstances in relation to Community First; ■ if the information indicates that Community First and their officers or employees have engaged in conduct that would contravene the Corporations Act, ASIC Act, Banking Act, FAR Act, Financial Sector (Collection of Data) Act, Insurance Act, Life Insurance Act, NCCP Act, Income Tax Assessment Act, Tax Administration Act and Superannuation Industry (Supervision) Act; ■ information indicating an offence against any Commonwealth law resulting in imprisonment for a period of 12 months or more, including offences that might constitute a breach of laws relating to modern slavery or otherwise which might constitute a modern slavery offence under relevant Australian Commonwealth, State or Territory criminal laws; ■ information indicating the conduct represents a danger to the public or the financial system; ■ information that a responsible person does not meet the fit and proper criteria as defined in CPS 520; or ■ information that Community First has not complied with the requirements of CPS 520 to provide information to APRA about a responsible person not meeting the fit and proper person criteria. The following disclosures also qualify for protection under this Policy: ■ a public interest disclosure or an emergency disclosure as defined in the Corporations Act; and ■ a disclosure to the Commissioner of Taxation under the Taxation Administration Act.
--------------	---

Whistleblower Policy BP33

P33.5	For the purpose of this policy, misconduct or an improper state of affairs or circumstances is defined as: ■ fraud; ■ negligence; ■ default; ■ breach of trust; ■ breach of duty; ■ any conduct that: ■ is dishonest or unethical; ■ may cause harm; or ■ is prohibited by Community First's standards or code(s) of conduct; ■ conduct that relates to or could result in a breach of any modern slavery prohibitions; or ■ misconduct or an improper state of affairs or circumstances as provided for in the Taxation Administration Act.
P33.6	Examples of misconduct or an improper state of affairs or circumstances include the following: ■ illegal conduct, such as theft, dealing in, or use of illicit drugs, violence or threatened violence, and criminal damage against property; ■ fraud including tax fraud, money laundering, terrorism financing and the misappropriation of funds; ■ offering or accepting a bribe; ■ financial irregularities; ■ failure to comply with, or breach of, legal or regulatory requirements including taxation legislation; and ■ engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made or be planning to make a disclosure.
P33.7	Eligible whistleblower An eligible whistleblower refers to an individual that is, or has been, any of the following: ■ an officer of Community First; ■ an employee of Community First; ■ an individual who supplies services or goods to Community First; ■ an employee of a person that supplies services or goods to Community First; ■ an individual who is an associate of Community First; ■ a relative of an individual referred to above; ■ a dependent of an individual referred to above, including spouse.
P33.8	Eligible recipient Individuals of Community First who are classed as eligible recipients include: ■ The Whistleblower Investigation Officer; ■ Directors and the Company Secretary; ■ Chief Executive Officer; ■ Chief Risk Officer; ■ Chief Operating Officer; ■ Any person authorised by the Board; ■ Community First's External Auditor; and ■ An eligible recipient for the purposes of the Taxation Administration Act.

Whistleblower Policy BP33

P33.9 Emergency disclosure

An emergency disclosure is a disclosure of information by an individual (the discloser) where:

- the discloser has previously made a disclosure of that information (the previous disclosure) that qualifies for protection; and
- a reasonable period has passed since the previous disclosure was made;
- the discloser has reasonable grounds to believe that there is an imminent risk of serious harm or danger to public health or safety, or to the financial system, if the information is not acted on immediately;
- after the end of the period the discloser gave the body to which the previous disclosure was made a written notification that:
 - includes sufficient information to identify the previous disclosure; and
 - states that the discloser intends to make an emergency disclosure; and
 - the disclosure is made to a member of Parliament of the Commonwealth, a State or Territory or journalist.

Application and Scope

P33.10 This Policy applies to:

- directors and employees;
- contractors;
- employees of contractors and associates of Community First (all past and present);
- a relative, dependant or spouse of any of the above;
- eligible whistleblowers and eligible recipients for the purposes of the Taxation Administration Act.

Responsibilities

P33.11 The Chief Risk Officer or their delegate will be responsible for the design and implementation of this Policy including establishing procedures for:

- receiving all disclosures of misconduct;
- establishing and managing a confidential filing system;
- collating and providing statistics on disclosures made;
- obtaining legal advice on the assessment of the disclosure, where required;
- forwarding disclosures and supporting evidence to regulatory agencies, if required.

P33.12 The suitably qualified Whistleblower Investigation Officer appointed by the Board is responsible for reviewing the reporting and investigations process, enforcing the procedures set out in this policy and is also responsible for receiving and reviewing all disclosures of misconduct, except where the disclosure relates to the conduct of the Chief Executive Officer or the designated Whistleblower Investigation Officer position, in which case the Chair of the Board Audit Committee is responsible.

P33.13 The Eligible Recipient of a disclosure is responsible for:

- making arrangements for a disclosure to be made privately and discreetly and, if necessary, away from the workplace;
- committing to writing any disclosure made verbally;
- impartially assessing the allegation and determine whether it is a disclosure made in accordance with this Policy;
- take all necessary steps to ensure the identity of the whistleblower and the identity of the person who is subject of the disclosure are kept confidential or if applicable, anonymous;
- reporting the matter to the Whistleblower Investigation Officer or their delegate to impartially assess the allegation and determine whether it is a disclosure made in accordance with this Policy, and for further investigation;
- dealing with vexatious or mischievous claims.

P33.14 All individuals (including staff members) must:

- be familiar with, and always act in accordance with, the procedures developed to raise concerns of misconduct including their rights and obligations;
- act honestly, reasonably and with genuine belief over the report of misconduct.

Whistleblower Policy BP33

Policy Statements

- P33.15** Community First encourages all staff, management and directors to report breaches of any law. Community First's intention in adopting this policy is to promote disclosure of perceived wrong-doing in order to:
- increase the likelihood of being aware of a wrong-doing in time to prevent serious damage;
 - reducing the amount of time and resources which would have otherwise been diverted to managing a crisis;
 - reducing the chances that staff, managers, directors and contractors will feel driven to take their concerns publicly or be in conflict with the relevant media policies;
 - deterring people from engaging in malpractice, by increasing the likelihood of being caught.
- P33.16** The person making the report is to be kept up to date in regards to the progress and outcomes of their report by the Whistleblower Investigation Officer at intervals no less than 3 months.
- P33.17** Confidentiality is to be maintained on all matters during the investigative process, with only required personnel having knowledge of any whistleblower reports.

Who is afforded protection?

- P33.18** Individuals are eligible for protection if disclosure is made by an eligible whistleblower to:
- the Australian Securities & Investments Commission (ASIC), Australian Prudential Regulation Authority (APRA) or other prescribed Commonwealth Authority including the Australian Transaction Reports and Analysis Centre (AUSTRAC) relating to a disclosable matter;
 - an eligible recipient relating to a disclosable matter;
 - a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to these protections.
- P33.19** The person in receipt of the disclosure will and must not disclose the identity of the discloser or information that is likely to lead to the identification of the discloser if the information is obtained in confidence or by way of qualification. Whilst we will still make best endeavours to investigate the disclosure, there may be some practical limitations in doing so if the whistleblower does not agree to share their disclosure or identity.

Exclusions from protection

- P33.20** Employee and industrial relations related issues and human resources related issues are excluded from the operation of this Policy because there are other established mechanisms to raise such complaints.
- P33.21** Personal work-related grievances and malicious or vexatious complaints do not qualify for protection under this Policy. Unsubstantiated allegations that are proven to have been maliciously, or are proven to be knowingly false, will be viewed seriously with disciplinary actions taken by Community First where appropriate.

Who can disclosures be made to?

- P33.22** The whistleblower must have reasonable grounds to suspect that the reported information indicates that the company or an officer or employee has, or may have engaged in unlawful conduct.

Whistleblower Policy BP33

P33.23 Eligible whistleblowers can make disclosures to:

- the Whistleblower Investigation Officer;
- ASIC, APRA, the ATO or other prescribed Commonwealth authority (including AUSTRAC);
- a legal practitioner, for the purposes of obtaining legal advice or legal representation in relation to the protections;
- to an eligible recipient, including an officer, auditor, member of the audit team, an actuary, and person authorised to receive disclosures or supervisor or manager of the individual within Community First.

An eligible whistleblower may disclose information to ASIC, APRA, the ATO or other prescribed Commonwealth authority (including AUSTRAC) at any time, including after finalisation of an investigation or any review of the outcomes of the investigation.

Community First encourages whistleblowers to make disclosures to the Whistleblower Investigation Officer in the first instance.

This is to enable Community First to address what has been disclosed as early as possible. This approach is intended to help build confidence and trust in Community First's whistleblower policy, processes and procedures.

The Whistleblower Investigation Officer is the person appointed to the position and is responsible for the management of the whistleblower complaint procedures and will seek the Board's approval for all actions required following the investigation of complaints.

Community First has engaged Grant Thornton to provide a Whistleblower Service; and the Whistleblower Investigation Officer is resourced by Grant Thornton.

If a report contains allegations for which the Whistleblower has reasonable belief that other avenues would not be sufficiently independent, the disclosure may be made to the Grant Thornton Whistleblowing Service.

The Grant Thornton Whistleblowing Service is an external, independent confidential means to receive disclosures of wrongdoing.

A disclosure will be answered by persons experienced in dealing in reports of wrongdoing, who will obtain information from the Whistleblower concerning their disclosure.

A report of the disclosure will be prepared and sent to the CEO or Chairman of the Board as determined by Grant Thornton's Whistleblower Investigations Officer.

P33.24 Disclosures can be made in the following ways:

For Identifiable disclosures; in person, over-the-phone, email or by post.

For Anonymous disclosures; over-the-phone or by post.

Disclosures to the Whistleblower Investigations Officer:

Disclosures may be made by way of personal contact, by phone, through the post or by email.

Email: communityfirst@myvault.net.au

Phone: free call 1300 558 918

Post: To be addressed to:

Community First
c/- Risk Consulting
GPO Box 4736
Melbourne VIC 3001

Disclosures to eligible recipients of Community First:

Disclosures may be made by way of personal contact, by phone, through the post or by email, and may be made privately and discreetly and, if necessary, away from the workplace.

Disclosures to regulatory bodies:

For reports to ASIC:

<https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/how-asic-handles-whistleblower-reports>

For reports to APRA:

<https://www.apra.gov.au/contact-us/become-whistleblower-or-make-public-interest-disclosure>

For reports to the ATO:

<https://www.ato.gov.au/general/gen/whistleblowers/>

Whistleblower Policy BP33

P33.25 Eligible whistleblowers may choose to remain anonymous and have their disclosures investigated in confidence. A whistleblower can choose to remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised. A whistleblower can refuse to answer questions that they feel could reveal their identity at any time, including during follow-up conversations. In addition, a whistleblower who wishes to remain anonymous should maintain ongoing two-way communication with the Whistleblower Investigation Officer, to allow the Whistleblower Investigation Officer to ask follow-up questions or provide feedback.

Supporting whistleblowers – Fair Treatment

P33.26 Community First is committed to supporting whistleblowers and encourages disclosures of any wrongdoings within the organisation. Community First also realises the potential element of fear individuals may have in making a disclosure of this kind. As such, Community First is committed to supporting eligible whistleblowers and protecting them from unnecessary detriment. Specifically:

- if an eligible disclosure is made, the individual's employment with Community First will not be terminated;
- Community First will assist with any issues the individual may have with their managers or colleagues as a result of the disclosure – our approach to this will be guided by the circumstances; and
- offer an EAP counselling service, if necessary.

Persons mentioned in a report – Fair Treatment

P33.27 Community First will ensure the fair treatment of all persons mentioned in a report from a whistleblower. We will:

- handle reports confidentially, when it is practical and appropriate in the circumstance;
- assess each report and investigate as appropriate;
- determine through investigation whether there is enough evidence to substantiate or refute the matters reported;
- where an investigation needs to be undertaken, the process will be objective, fair and independent;
- advise the employee who is the subject of a report as and when required by principles of natural justice and procedural fairness and prior to taking action such as commencing an investigation;
- advise the employee who is the subject of a report that they may contact Community First's EAP counselling service.

Whistleblower Policy BP33

Whistleblower Protections

P33.28	Whistleblowers will qualify for protections available under the whistleblower regime if the report qualifies for protection under the Corporations Act or the Tax Administration Act. These protections also apply to emergency disclosures made by eligible whistleblowers. An eligible whistleblower qualifies for protection from the time they make their disclosure, regardless of whether the whistleblower or recipient recognises that the disclosure qualifies for protection. Eligible whistleblowers are afforded protection under the law if information relating to a disclosable matter is relayed to ASIC, APRA, other prescribed Commonwealth authority (including AUSTRAC), legal practitioner or an eligible recipient, including: ■ confidentiality of identity; ■ no civil, criminal or administrative liability for making an eligible disclosure; ■ no contractual or other remedy enforced or exercised against a whistleblower, example termination of contract; ■ the disclosed information would not be admissible as evidence against the person in criminal proceedings; ■ prohibition against conduct that causes detriment to the whistleblower including: ■ dismissal from employment; ■ injury to employment (e.g. demotions); ■ alteration of an employee's position or duties to their disadvantage; ■ discrimination of the employee; ■ harassment or intimidation of a person ■ harm or injury to the individual, including psychological harm; ■ damage to individual's property or reputation; ■ damage to a person's business or financial position.
---------------	---

Identity Protections

P33.29	When information is disclosed by a whistleblower in accordance with this Policy, it is illegal for the person receiving the information to tell anyone other than ASIC, APRA, other prescribed Commonwealth authority (including AUSTRAC), the Australian Federal Police or the Commissioner of Taxation any of: ■ the information disclosed; ■ the identity of the person making the disclosure; or ■ any information which will enable the identification of the person making the disclosure unless the whistleblower consents to the disclosure. The Whistleblower Investigation Officer will provide assurance to a whistleblower that Community First is committed to protecting the confidentiality of their identity. The Whistleblower Investigation Officer will explain the procedures Community First has in place for ensuring confidentiality and privacy.
---------------	--

Exceptions to disclosure of identity or information

P33.30	The identity of the whistleblower may be disclosed without that person's consent where the disclosure is made: ■ to ASIC, APRA the Australian Federal Police, or to a Commonwealth, state or territory authority to help the authority in the performance of its functions or duties; ■ to a legal practitioner for the purposes of obtaining legal advice or legal representation about the whistleblower provisions in the Act and/or the Taxation Administration Act; or ■ to a person or body prescribed by Commonwealth regulations.
---------------	---

Whistleblower Policy BP33

- P33.31** The **information** contained in the whistleblower's disclosure may be disclosed without that person's consent if:
- the information does not include the whistleblower's identity;
 - Community First has taken all reasonable steps to reduce the risk that the whistleblower will be identified from the information; and
 - it is reasonably necessary in the view of the person conducting the investigation for investigating the issues raised in the disclosure.

Detrimental conduct

- P33.32** Community First's officers, employees, contractors and their relatives, dependants or spouses, must not engage in conduct that causes detriment to a whistleblower (or another person), in relation to a disclosure, if:

- (a) the person believes or suspects that the whistleblower (or another person) made, may have made, proposes to make or could make a disclosure that qualifies for protection; and
- (b) the belief or suspicion is the reason, or part of the reason, for the conduct.

Examples of detrimental conduct include:

- dismissal of the employee;
- injury of the employee in his or her employment (e.g. demotions);
- alteration of an employee's position or duties to his or her disadvantage;
- discrimination between an employee and other employees of the same employer;
- harassment or intimidation of a person;
- harm or injury to the person, including psychological harm;
- damage to a person's property;
- damage to a person's reputation;
- damage to a person's business or financial position; or
- any other damage to a person.

Each example above includes detriment to a relative, spouse or dependent of the person.

Community First's officers, employees, contractors and their relatives, dependants or spouses, must not make a threat to cause detriment to a whistleblower (or another person) in relation to a disclosure. A threat may be express or implied, or conditional or unconditional. A whistleblower (or another person) who has been threatened in relation to a disclosure does not have to actually fear that the threat will be carried out.

- P33.33** Examples of detrimental conduct **do not** include:
- administrative action that is reasonable to protect an employee from detriment (e.g. when the disclosure relates to wrongdoing in the employees immediate work area); or
 - managing an employee's unsatisfactory work performance in accordance with Community First's performance management framework.

Under this policy the whistleblower is protected from detrimental conduct by any person (including officers, employees, consultants and contractors of Community First) and from a threat to cause detriment to a whistleblower (or another person) in relation to a disclosure. Community First will regard any such conduct very seriously and take appropriate action, which may include, in the case of employees, disciplinary action and dismissal.

Whistleblower Policy BP33

P33.34 Similarly, all reasonable steps must be taken to ensure that no person is subject to, or threatened with, a detriment because of any notification in purported compliance with the requirements of the Taxation Administration Act and APRA CPS 520.

The Whistleblower Investigation Officer will:

- provide assurance to a whistleblower that Community First is committed to protecting the welfare of the whistleblower; and
- explain Community First's processes for assessing the risk of detriment against a whistleblower and other persons after receiving a disclosure; and
- suggest counselling (or other professional or legal services) that are available to a whistleblower;
- strategies to help a whistleblower minimise and manage stress, time or performance impacts, or other challenges resulting from the disclosure or its investigation; and
- advise the specific actions Community First will take to protect a whistleblower from risk of detriment (or if the detriment has already occurred what specific actions Community First will take to protect and support the whistleblower); and
- explain how Community First will ensure that management are aware of their responsibilities under this Policy including but not limited to:
 - maintain the confidentiality of a disclosure;
 - address the risks of isolation or harassment;
 - manage conflicts; and
 - ensure fairness when managing the performance of, or taking other management action relating to, a whistleblower;
- explain to the whistleblower how they can lodge a complaint if they have suffered detriment and what actions Community First will take in response to the complaint; and
- explain how the whistleblower can seek independent legal advice or contact the relevant regulatory bodies in the event they believe they have suffered detriment.

P33.35 These protections also apply to emergency disclosures made by eligible whistleblowers.

Investigation Process

P33.36 1. Review of the allegations

Whistleblower disclosures will be referred to the Whistleblower Investigation Officer, who will carry out a preliminary review of the allegations raised in the disclosure. Following that review, the Whistleblower Investigation Officer will decide whether the allegations will be formally investigated.

Unless the whistleblower has elected to remain anonymous, the Whistleblower Investigation Officer will advise the whistleblower of the decision and will also confirm whether the whistleblower is seeking the protections in this policy or under applicable laws.

If a decision is made that the allegations will be formally investigated, then the Whistleblower Investigation Officer will conduct an investigation and may seek legal or other external advice and assistance in completing the investigation.

The Whistleblower Investigation Officer will also inform the Talent Manager and Chief Executive Officer of the investigation and provide regular updates on the status of the investigation. In cases where the alleged conduct involved the Chief Executive Officer, the Chair of the Board Audit Committee will be informed.

P33.37 2. Investigation process

Investigations will be conducted independently of the subject of the allegations. The whistleblower may be provided, as appropriate, feedback and updated on the progress and expected timeframes of the investigation. Where appropriate, the subject of the allegations will be informed of the allegations and provided with the opportunity to respond.

P33.38 3. Concluding the investigation

The Whistleblower Investigation Officer (or other investigator) will provide a report setting out the findings on the allegations and a summary of the evidence. Findings can include that an allegation is fully substantiated, partially substantiated, not able to be substantiated or disproven.

To the extent permitted, the Whistleblower Investigation Officer will inform the whistleblower of the findings, however they will not receive a copy of the final report. Any findings that relate to criminal activity will be reported to the police and/or regulators.

Whistleblower Policy BP33

P33.39 4. Escalation

Through the above process and if deemed necessary, the Whistleblower Investigation Officer may escalate the allegations, investigation or outcomes to the Chief Executive Officer or Chair of the Board Audit Committee.

P33.40 5. Review of investigation outcome

If a whistleblower is not satisfied with the outcome of an investigation, a review may be conducted by an independent person who is not involved in handling and investigating disclosures.

The review findings will be provided to the Chair of the Board Audit Committee.

Community First is not obliged to reopen an investigation and may conclude a review if it finds that the investigation was conducted properly, or new information is either not available or would not change the findings of the investigation.

Policy Distribution

P33.41 This Policy will be made available to Community First officers and employees to promote awareness and the raising of misconduct via the following:

- staff briefing sessions and/or smaller team meetings;
- intranet;
- employee induction information packs;
- training for new starters; and
- on the Community First website.

For potential disclosers outside Community First this Policy will be made available by the Community First website.

Whistleblower Policy BP33

Flowchart of the Whistleblowing Process

