

DOCUMENT NUMBER	VERSION	DATE	APPROVED BY
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WHISTLEBLOWER POLICY

Purpose

M3 Logistics supports a culture of honest and ethical behaviour, corporate compliance and good corporate governance.

Instances of suspected unethical, illegal, fraudulent or undesirable conduct involving M3 Logistics can be reported through the Whistleblower policy.

M3 Logistics will provide protections and measures so that persons who make a report can do so confidentially or anonymously and without fear of intimidation, disadvantage or reprisal.

Who the Policy applies to

- an officer or employee (including current and former employees whether permanent, casual, fixed-term or temporary, managers and directors);
- a supplier of services or goods to M3 Logistics (whether paid or unpaid), including their employees (current and former labour hire staff, contractors, consultants, service providers and business partners);
- an individual who is an associate of M3 Logistics (meaning a director, Chair or Secretary of M3 Logistics); or
- a relative or spouse of a person outlined above

What is reportable conduct?

You may make a report under this policy if you have reasonable grounds to suspect that a M3 Logistics officer, employee, contractor or supplier has engaged in conduct which is reportable. Examples of Reportable Conduct includes:

- illegal conduct, such as theft, dealing in or use of illicit drugs, violence or threatened violence or criminal damage to property;
- fraud, money laundering or misappropriation of funds
- offering or accepting a bribe
- financial irregularities
- failure to comply with, or breach of, legal or regulatory requirements
- unethical or improper conduct which raises significant implications for M3 Logistics
This may include:
 - serious and/or systematic breaches of M3 Logistics policies
 - bullying or harassment
 - misuse of sensitive or confidential information
 - unfair or unethical business behaviour or practices in dealing with a client, customer, contractor or supplier (including a potential client, customer, contractor, supplier) or their employees
- conduct likely to damage M3 Logistics' financial position or reputation; and

- victimisation for making or proposing to make a disclosure under the Policy; and
- any behaviour that poses a serious risk to the health and safety of any person at the workplace, or to public health or safety, or the environment (even where this does not constitute a breach of any law).

Reports made under this policy must be made honestly, ethically and on reasonable grounds. If a report turns out to be incorrect, the person reporting may still qualify for protections under this policy.

What is not reportable conduct?

Reports that relate solely to personal work-related grievances and that do not relate to detriment or threat of detriment to the discloser, will not qualify for protection under this policy.

- Interpersonal conflict at work
- A decision relating to recruitment, transfer or promotion
- A decision relating to terms and conditions of employment
- a decision to suspend or terminate employment
- disciplinary action

Who can I make a report to?

Internally

The following are eligible to receive disclosures internally by email, telephone or in person:

- (a) Head of People & Culture

Externally

Disclosure can also be made to **Your Call**. They provide an independent Whistleblower service to M3 Logistics.

The **Your Call** reporting options include:

- Website www.yourcall.com.au/report
Available 24/7
Use the organization code: M3L
- Telephone 1300 790 228
Available 7am and 12am, recognised business days, AEST

Online reports can be made via the website address listed above. You will be required to enter M3 Logistics unique identifier code **M3L**.

Disclosures to **Your Call** will be handled confidentially and securely to provide anonymity.

Protections for Whistleblowers

Identity Protection (Confidentiality)

Where a report is made anonymously, M3 Logistics will keep the Reporters identity confidential. It is illegal for a person to identify a Reporter or disclose information that is likely to lead to the identification of the Reporter.

The identity of the Reporter can be revealed if;

- a) The Reporter consents
- b) The concern is raised with ASIC, APRA, or a member of the Australian Federal Police;

- c) The concern is raised with a legal practitioner (for the purposes of obtaining legal advice or legal representation about the whistleblower provisions in the Act);

Protection from Detrimental Treatment

Detrimental treatment includes dismissal, demotion, harassment, discrimination, disciplinary action, bias, threats or other unfavourable treatment.

If you are subjected to detrimental treatment as a result of making a report under this policy you should inform Head of People & Culture or Chair of the Board of Directors.

Safe Record Keeping (Confidentiality)

All files and records created from an investigation will be kept securely.

Unauthorised release of information regarding an investigation is a breach of this policy. Only senior managers or directors may have access to information and only for the purpose of investigation or taking appropriate action to remedy a breach of this policy.

Investigating a Report

Reports will be taken seriously and investigated thoroughly.

If an investigation is required, the M3 Logistics will determine;

- The nature and scope of the investigation
- Who should lead the investigation
- Any technical, financial or legal advice required
- The anticipated timeframe for the investigation

Where practicable, M3 Logistics will keep the Reporter informed of the steps taken or to be taken (or if no action is to be taken, the reason for this), and provide appropriate updates, including about the completion of any investigation. However, the extent of the information provided, or whether it will be provided at all, will be subject to applicable confidentiality considerations, legal obligations and any other factors M3 Logistics considers relevant in the particular situation.

If a report is made anonymously, then no updates will be practicable.

Accessibility of this Policy

This policy is available on the National Document Register shared drive in the National Policies folder.

The policy is also available on the M3 Logistics website.