

# Whistleblower Policy

# Policy

## 1. Scope

This policy extends to PWR Holdings Limited's (PWR) global business including its board members, employees, contractors, and suppliers, whether or not they are still employed with or have a relationship with PWR and extends to their relatives, dependants and/or spouses.

## 2. Purpose

PWR is committed to developing a culture where all staff are encouraged to raise concerns about poor or unacceptable practices, misconduct or anything improper, and can do so safely. The purpose of this policy is to promote responsible disclosure about issues where the interests of others, including the public, or of PWR itself, are at risk. Such issues might include:

- Dishonesty
- Fraud
- Theft
- Harassment
- Workplace bullying
- Discrimination (sex, age, gender, race, religion e)
- Bribery and corruption
- Modern Slavery
- Manipulation or falsification of financial records
- Illegal activities
- Unethical behaviour
- Unsafe work practice
- Victimisation
- Breach of Code of Conduct or other PWR policies
- Other serious improper conduct, or
- Any other conduct which may cause financial or non-financial loss to PWR or be otherwise detrimental to the interests of PWR.

## 3. Responsibilities for all board members, employees, contractors

Each board member, employee, contractor is:

- in a position of trust and must adhere to appropriate standards of ethical behaviour including compliance with PWR's policies, applicable laws and regulations
- expected to make every effort to protect the interests of PWR, including taking action to prevent the occurrence of inappropriate practices and/or behaviour.

To the extent that a person becomes aware of inappropriate behaviour, misconduct or anything improper, they should follow the procedures outlined below.

## 4. Confidentiality

Employees can raise their disclosure anonymously or ask that their identity not be disclosed. Anonymous disclosures will be investigated.

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## 5. Commitment to protecting employees

PWR is committed to protecting employees in making disclosures and has appointed a whistleblower protection officer, Lisa Dalton, Company Secretary, who has the responsibility of providing individual employees with protection against disadvantage.

## 6. Anonymity

All reasonable efforts will be made to ensure that anonymous disclosures remain anonymous.

## 7. Immunity from Disciplinary Action

Retaliation against a whistleblower will not be tolerated.

If an allegation is made objectively and on reasonable grounds but is not confirmed by the investigation, no action will be taken against the person raising the misconduct concern.

PWR will focus on the quality of the information that is reported, not the motivation of the whistleblower. PWR expects its people to use the whistleblower process appropriately and with honesty and on reasonable grounds.

## 8. Reporting concerns

If you have any known or suspected concerns about poor or unacceptable practices, misconduct, anything improper or the appropriateness of someone's conduct, you should make a disclosure about it. Your responsibility is to report this concern to Lisa Dalton, Company Secretary on Phone: +61 438175905 Email: LisaD@pwr.com.au.

If you feel uncomfortable or unable to report your concern to the Company Secretary, please contact PWR's confidential and free whistleblower service that is operated 24/7 by an independent third party, 'Your Call' by calling one of the free-call numbers below:

Australia - 1300 790 228

United States of America - 1(800) 897 2761

United Kingdom – 0-800-046-5662

Any disclosures will be investigated fully. The person raising the matter will be kept informed of the progress and the outcome of the investigation, within the constraints of maintaining confidentiality or observing legal restrictions generally.

## 9. Group Reporting Procedures

The Board, through the Audit and Risk Committee, will receive confidential reports on the number and type of whistleblower incidents half yearly to enable it to address any issues at a regional or group level. These reports will be made on a "no name's basis", maintaining the confidentiality of matters raised under this policy.

Where the subject matter of a report could be materially price sensitive, the person receiving the complaint should consider whether any action needs to be taken under the company's continuous disclosure policy (while maintaining confidentiality to the full extent required by law).

## 10. Review of policy

This policy and the actions outlined above will be reviewed to ensure they are relevant and appropriate for our workplace.

## 11. Related policies and procedures

- Code of Conduct
- Anti-Bribery and Corruption Policy
- Ethical Sourcing and Modern Slavery Policy
- Equal Employment Opportunity Policy
- Work Health and Safety policies
- Treasury Policy

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- Email and Internet and social media policies.

## 12. Endorsement

PWR’s board and executive team is committed to this policy and its implementation and to ensuring an ethical and safe working environment.

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