

Whistleblower Policy

What is it? Cricket Australia (CA) encourages its personnel, players, officials, coaches and participants (each a **CA Person**) to report incidents of misconduct or an improper state of affairs. This Policy outlines how CA will support and protect those who make such reports, and how we will deal with and investigate reports captured under the Policy. It aims to assist in ensuring that misconduct and improper behaviours are identified and dealt with appropriately. If a CA Person becomes aware of any matter or behaviour that may amount to Improper Conduct, as defined by the Policy, they should report it to:

- a Protected Disclosure Officer, the details of which are set out in Schedule 1 to this Policy;
- the Cricket Integrity Hotline on 1300 FAIR GAME (1300 3247 4263) (an externally monitored hotline that also allows for anonymous disclosure); or
- to any of the remaining Eligible Recipients at clause 6 of the Policy.

Please refer to the Policy details below.

Version	Issue Date	Comments	Created By	Consulted	Approved By	Review date
4.0	October 2013	Updated	CA People & Culture Manager	AC Heads of People & Culture	AC Heads of People & Culture	October 2014
4.1	July 2018	Updated	CA People & Culture Manager	AC Heads of People & Culture	AC Heads of People & Culture	July 2019
5	April 2019	CA approved	CA General Manager, People & Culture CA Head of Integrity			
6	August 2019	Updated	CA General Manager, People & Culture CA Legal Counsel	AC Heads of People & Culture	AC Heads of People & Culture	December 2019
7	July 2023	Draft	CA EGM People & Culture	AC Heads of People & Culture		
8	April 2026	Draft	CA EGM Legal & Business Affairs CA Head of Integrity	People & Culture Legal Integrity		

CA endorses the Whistleblower Policy as a CA Policy that must be complied with as set out in this Policy.

1 POLICY STATEMENT

As part of our vision to be a sport for all that makes Australians proud, CA is committed to fostering a culture of the highest standards of honesty, integrity, lawful

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and ethical behaviour. Accordingly, CA has developed policies which promote this culture.

CA will not tolerate any corrupt, illegal, unethical or other undesirable conduct. We encourage people to speak up and report any Improper Conduct (defined in clause 4 below) on reasonable grounds.

CA will not tolerate anyone being discouraged from speaking up or being subject to victimisation because they have done so. All Eligible Whistleblowers should feel confident about reporting without the fear of reprisal. CA is committed to protecting and supporting Eligible Whistleblowers.

2 PURPOSE

The objectives of this Policy are to:

- (a) promote open communication throughout CA by encouraging reporting of potential Improper Conduct;
- (b) develop practices which help deter and reduce the risk of Improper Conduct;
- (c) ensure individuals who speak up about potential Improper Conduct can do so safely, securely and with confidence they will be protected from reprisal and supported;
- (d) provide transparency around CA's framework for receiving, handling, and investigating reports of potential Improper Conduct; and
- (e) ensure that Improper Conduct is identified and dealt with appropriately and in a timely manner, safeguarding the reputation, values, and ethics of our sport.

3 WHO DOES THIS POLICY APPLY TO?

This Policy applies to CA.

The reporting mechanisms outlined in this Policy apply to any individual who is:

- (a) a current or former CA employee, including employees who are permanent, part-time, fixed term or temporarily engaged, interns and secondees;
- (b) a current or former officer of CA, for example a Board Director or Company Secretary;
- (c) a current or former supplier of services or goods to CA, whether paid or unpaid including their employees;
- (d) an associate of CA;
- (e) a relative, dependent, or spouse of an individual identified in (a) to (d) above; and
- (f) any other person who is eligible to be a Whistleblower in accordance with applicable legislation, including the *Corporations Act 2001 (Cth)* (Act) from time to time,

(together, an **Eligible Whistleblower**).

A person qualifies for protection under this Policy if they are;

- a) an Eligible Whistleblower; and
- b) they make a report of Improper Conduct to an Eligible Recipient (**Protected Disclosure**) in accordance with this Policy.

A person may also be a whistleblower and eligible for protection under this Policy in accordance with the provisions of the Taxation Administration Act 1953 (Cth).

4 WHAT IS IMPROPER CONDUCT?

4.1 Meaning of Improper Conduct

Improper Conduct captures the conduct of any person connected with CA which an Eligible Whistleblower has reasonable grounds to suspect constitutes misconduct or an improper state of affairs or circumstances in relation to CA or a breach of CA policies, regulations or laws.

Improper Conduct may include conduct that an Eligible Whistleblower believes on reasonable grounds:

- (a) constitutes bribery or corruption;
- (b) constitutes theft, fraud, dishonest, unethical, or irresponsible behaviour;
- (c) constitutes misleading or deceptive conduct;
- (d) constitutes significant mismanagement or waste of CA's funds or resources;
- (e) constitutes serious harm to public health, safety or environment or the health and safety of any CA Person;
- (f) constitutes any other conduct that is reasonably likely to cause loss to CA, or otherwise that is reasonably likely to be detrimental to its interests;
- (g) constitutes any action taken against, or harm suffered by an Employee or CA Person because of speaking up and making a report under this Policy;
- (h) constitutes an offence against, or a contravention of, a provision of any of the following:
 - the Act;
 - the Australian Securities and Investments Commission Act 2001;
 - the Banking Act 1959;
 - the Financial Sector (Collection of Data) Act 2001;
 - the Insurance Act 1973;
 - the Life Insurance Act 1995;
 - the National Consumer Credit Protection Act 2009;
 - the SIS Act;
 - an instrument made under an Act referred above;
- (i) constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more; or
- (j) represents a danger to the public or the financial system; is prescribed by regulation.

Improper Conduct is generally distinct from a personal work-related grievance (described in clause 5 of this Policy).

4.2 False Reports

Reports of Improper Conduct made under this Policy must be based on reasonable grounds that the information disclosed is true. All Eligible Whistleblowers making reports of Improper Conduct on reasonable grounds to an Eligible Recipient will be protected from reprisal for making the report, in accordance with the terms of this Policy and the Act, even if the disclosure subsequently turns out to be incorrect.

Any allegation contained in a report made under this Policy that is unsubstantiated, which proves to have been made maliciously, with an ulterior motive, for personal gain, or was knowingly false (**False Report**) will be unable to access the protections under this Policy.

Making a False Report is considered a serious matter and may result in disciplinary action, up to and including termination of employment.

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5 WHAT IS A PERSONAL WORK-RELATED GRIEVANCE?

Personal work-related grievances are matters which relate to someone's current or former engagement within CA and only have implications for the individual personally but have no significant implications for CA beyond the individual's personal circumstances or relates to any Improper Conduct.

Examples of personal work-related grievances include:

- (a) an interpersonal conflict between an Eligible Whistleblower and another person within CA;
- (b) a decision about an Eligible Whistleblower's engagement, transfer, or promotion;
- (c) a decision about an Eligible Whistleblower's terms and conditions of engagement; or
- (d) an Eligible Whistleblower's suspension, termination or disciplinary decision.

Disclosures that relate solely to personal work-related grievances, are not covered for protection by this Policy.

Anyone who believes they have a personal work-related grievance should contact the People & Culture Team in accordance with the CA Grievance Procedure. This Policy is designed to complement CA's ordinary communication channels and is not intended to restrict possible Eligible Whistleblowers from raising issues and discussing concerns with appropriate managers, or with its directors and senior leadership as would ordinarily be appropriate.

However, if the personal work-related grievance includes information about Improper Conduct, then it may still qualify for whistleblower protections as set out under clause 8 of this Policy. Examples of this include:

- (a) a personal work-related grievance mixed with a report of Improper Conduct;
- (b) a report divulging a breach of employment or other laws punishable by imprisonment for a period of 12 months or more;
- (c) a report about conduct that represents a danger to the public; or
- (d) an Eligible Whistleblower suffers from, or is threatened with, detriment for making a disclosure.

6 HOW CAN SOMEONE SPEAK UP ABOUT POTENTIAL IMPROPER CONDUCT?

If someone becomes aware of any matter or behaviour that may amount to Improper Conduct, they should speak up and consider reporting the matter either:

- (a) **internally**, to a Protected Disclosure Officer, as set out in Schedule 1 of this Policy; or
- (b) **externally**, to any of the following:
 - i. the Cricket Integrity Hotline (contact details below);
 - ii. an appointed regulatory body, namely ASIC or APRA;
 - iii. a parliamentarian or journalist (for certain disclosures in limited circumstances as set out below); or
 - iv. a legal practitioner(together, the **Eligible Recipients**)

We encourage all Eligible Whistleblowers to consider internal means of reporting in

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the first instance to allow CA an opportunity to swiftly respond to any disclosures. However, all reports of Improper Conduct made under this Policy to an Eligible Recipient will be taken seriously irrespective of the disclosure method.

Internal Reporting – Protected Disclosure Officers

Disclosures can be made to any of the Protected Disclosure Officers listed in Schedule 1 by email, phone, in person or in writing addressed to CA's registered address. Reports may be made anonymously.

External Reporting – Cricket Integrity Hotline

External provider Core Integrity manages the Cricket Integrity Hotline, and reports may be made anonymously.

Ways to make a report:

1. Phone: 1300 FAIR GAME (1300 3247 4263);
2. Email: fairgame@coreintegrity.com.au;
3. Online:
<https://landing.coreplusplatform.com/66d7bc6a029af94d06d9a4e4/67415b3617e8506794fe4b03>; or
4. Scan this QR Code:



After receiving a Protected Disclosure, the Cricket Integrity Hotline operator will provide details of the Protected Disclosure to the relevant Protected Disclosure Officer.

Contact details of an Eligible Whistleblower provided to the Cricket Integrity Hotline will not be provided to any other person without the Eligible Whistleblower's consent.

External Reporting – Regulators

Reports may also be made to ASIC, APRA or to a prescribed Commonwealth authority in accordance with the Act. This includes reporting Improper Conduct, breaches of an Eligible Whistleblower's confidentiality or if an Eligible Whistleblower experiences detriment following a disclosure of Improper Conduct.

Concerns can be reported to ASIC via their online reporting form: <https://asic.gov.au/about-asic/contact-us/how-to-complain/report-misconduct-to-asic/>

Concerns to APRA can be emailed to whistleblower@apra.gov.au

All reports made to ASIC and APRA are confidential and reports can be made anonymously. CA must comply with the whistleblower protections outlined by this Policy where Improper Conduct is disclosed to ASIC or APRA.

External Reporting – Parliamentarian or Journalist

In **limited circumstances** the law allows an Eligible Whistleblower to make an **emergency or public interest disclosure** to a member of Parliament or a journalist.

An **emergency disclosure applies where**:

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- (a) the matter has previously been reported to ASIC, APRA or a prescribed Commonwealth authority in accordance with the Act;
- (b) the Eligible Whistleblower has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment;
- (c) the Eligible Whistleblower provides written notice to the person to whom the initial disclosure was made under this Policy, that includes sufficient information to identify the previous disclosure and states that the Eligible Whistleblower intends to make an emergency disclosure; and
- (d) the emergency disclosure is no greater than necessary to inform the recipient of the substantial and imminent danger.

In addition to emergency disclosures, an Eligible Whistleblower also has the ability to make a **public interest disclosure** in respect of any disclosure they have previously made to ASIC, APRA or a prescribed Commonwealth authority at least 90 days before, if:

- (a) they have reasonable grounds to believe that no action has or will be taken in respect of that prior disclosure;
- (b) they have notified the body to which they initially disclosed their intention to make a public interest disclosure; and
- (c) the criteria and conditions set out in the Act in respect of public interest disclosures is otherwise met.

Eligible Whistleblowers who make disclosures to members of Parliament or journalists that do not meet the conditions of an emergency or public interest disclosure do not qualify for the protections set out in this Policy in respect of those disclosures.

An Eligible Whistleblower should seek independent legal advice before making any emergency disclosure or public interest disclosure.

External Reporting – Legal Practitioner

Disclosures of Improper Conduct can also be made to legal practitioners.

Disclosing information to a lawyer for the purpose of obtaining that legal advice or legal representation will not change the application of this Policy or the protection provided to any Eligible Whistleblower under it (even if the legal practitioner concludes that the disclosure does not relate to Improper Conduct).

7 HOW WILL ANONYMITY AND CONFIDENTIALITY BE MANAGED?

Anonymity:

An Eligible Whistleblower may elect to make a report anonymously and still be protected under the Act and this Policy.

CA is committed to respecting an Eligible Whistleblower's right to report Improper Conduct under this Policy on an anonymous basis and it will in no way affect an Eligible Whistleblower's ability to obtain protection under this Policy.

It is noted that where a report is made anonymously this may affect CA's ability to fully investigate the matter.

Confidentiality:

CA is subject to legal obligations of confidentiality in relation to Eligible Whistleblowers.

CA is prohibited from disclosing an Eligible Whistleblower's identity, or any information that could lead to an Eligible Whistleblower's identity being revealed following the

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report of a Protected Disclosure.

An Eligible Whistleblower's identity can only be disclosed:

- (a) with the consent of the Eligible Whistleblower;
- (b) to ASIC, APRA or a member of the Australian Federal Police;
- (c) to a legal practitioner for the purposes of obtaining legal advice or representation about the whistleblower provisions of the Act; or
- (d) to a person prescribed by the regulations.

The information contained in a report of Improper Conduct can be identified with or without the discloser's consent if:

- (a) the information does not include the Eligible Whistleblower's identity;
- (b) CA has taken all reasonable steps to reduce the risk that the Eligible Whistleblower will be identified from the information; and
- (c) it is reasonably necessary to identify the information in order to investigate the issues raised in the disclosure.

Practical management:

CA will implement the following measures and/or mechanisms in practice to protect both the anonymity (where applicable) and confidentiality of an Eligible Whistleblower, including by:

- (a) ensuring that all CA and external personnel who are involved with Eligible Whistleblowers participate in training, including receiving information on anonymity and confidentiality obligations and procedures for handling disclosures made under this Policy;
- (b) requiring that Eligible Whistleblowers be referred to in a gender-neutral context;
- (c) ensuring that reports of disclosures made to the Board do not include personal information about the Eligible Whistleblower;
- (d) allowing Eligible Whistleblowers to use anonymised email addresses;
- (e) allowing Eligible Whistleblowers to adopt a pseudonym for the purpose of their disclosure (for example, where the Eligible Whistleblower's identity is known by the person who received the report, but they do not wish to disclose their identity to others);
- (f) where possible, contacting Eligible Whistleblowers to help identify aspects of their disclosure that could inadvertently identify them as a form of risk management;
- (g) establishing information sharing and storage protocols for those handling and managing information relating to a disclosure, including secure and limited-access electronic storage;
- (h) enabling Eligible Whistleblowers to make reports externally and on the basis that their personal information is accessed only by the Cricket Integrity Hotline; and
- (i) ensuring no details of participation in an Eligible Whistleblower process are included in the Eligible Whistleblower's file or performance review.

Breaching an Eligible Whistleblower's anonymity and/or confidentiality may carry civil

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and criminal penalties for both individuals and organisations including significant fines and/or imprisonment.

8 **WHAT PROTECTIONS EXIST IF SOMEONE SPEAKS UP UNDER THE POLICY?**

CA will take all reasonable steps to ensure an Eligible Whistleblower is protected from any form of detriment including discrimination, harassment, or retaliation because of their Protected Disclosure.

Workplace protection

CA has a legal obligation to protect the confidentiality of a discloser's identity. It is illegal for a person to identify a discloser or disclose information that is likely to lead to the identification of the discloser outside the exceptions noted above at clause 7.

Anyone within CA who is found to have dismissed, demoted, harassed, discriminated or otherwise caused detriment to an Eligible Whistleblower (or threatened this behaviour) because of their status as an Eligible Whistleblower, may be subjected to disciplinary measures, including summary dismissal in line with relevant CA policies, in addition to the civil and criminal penalties.

If an Eligible Whistleblower considers that they have experienced any detriment or disadvantage as a result of their Protected Disclosure, they may:

- (a) contact the person to whom the report was made and provide all relevant details accordingly;
- (b) make a complaint under the CA Grievance Procedure; and/or
- (c) seek independent legal advice regarding any detriment they consider has come from their disclosure.

Once CA becomes aware that an Eligible Whistleblower considers that they have suffered detriment as a result of a disclosure, it will take all reasonable steps to investigate.

Protections under the Act

An Eligible Whistleblower can seek compensation and other remedies through the courts if:

- (a) they suffer loss, damage or injury because of making a disclosure of Improper Conduct; and
- (b) CA failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

Any Eligible Whistleblower who makes a Protected Disclosure in accordance with this Policy also has protection under Australian law from criminal, administrative and contractual liability in relation to the making of the disclosure.

The Act provides that an Eligible Whistleblower will qualify for further special protection where certain conditions prescribed in Part 9.4AAA of the Act are satisfied. Those protections include:

- (a) the Eligible Whistleblower is immune from any civil or criminal liability for making the disclosure (but not necessarily immune from liability for their involvement in any conduct which is the subject of the disclosure);
- (b) no contractual or other remedies may be enforced, and no contractual or other right may be exercised (including any purported termination), against the Eligible Whistleblower for making the report (or on the basis that disclosure constitutes a breach of that contract);
- (c) the Eligible Whistleblower may have qualified privilege in respect of the

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disclosure;

- (d) in some circumstances, the reported information may not be admissible against the Eligible Whistleblower in criminal proceedings or in proceedings for the imposition of a penalty;
- (e) anyone who causes or threatens to cause detriment to an Eligible Whistleblower or another person on the belief or suspicion that a report has been made, may have been made, proposes to or could be made, may be guilty of an offence and may be liable for damages to the Eligible Whistleblower;
- (f) an Eligible Whistleblower's identity cannot be disclosed to a Court or tribunal except where considered necessary; and
- (g) the person receiving the report commits an offence if they disclose the substance of the report or the Eligible Whistleblower's identity, without the Eligible Whistleblower's consent, to anyone except ASIC, APRA, the AFP or a lawyer for the purpose of obtaining legal advice or representation in relation to the report.

These protections do not grant the Eligible Whistleblower immunity for any misconduct the Eligible Whistleblower has engaged in that may be revealed in their disclosure of Improper Conduct.

9 WHAT HAPPENS ONCE A REPORT IS MADE?

Procedure

Investigations into Protected Disclosures will be conducted by a designated investigator (**Whistleblower Investigation Officer**) overseen by either the Integrity Unit and/or People & Culture Department. The Whistleblower Investigation Officer will:

- (a) document the report and determine whether it qualifies for protection under this Policy;
- (b) determine whether a formal, in-depth investigation is required;
- (c) if necessary, commence an investigation into the report, as soon as practicable after the matter has been reported;
- (d) review all supporting documentation and obtain further information as required, including by interviewing individuals named in the report or relevant witnesses;
- (e) consider any possible remedial action that may be required; and
- (f) immediately notify the Executive General Manager, Legal & Business Affairs (or the Chair of the People, Culture and Sustainability Committee), if the Executive General Manager, Legal & Business Affairs is in any way referenced in, or implicated by, the Improper Conduct) if the report relates to a serious matter, or if it becomes apparent during the investigation that there are matters of serious concern.

The purpose of any investigation under this Policy is to carefully, thoroughly and fairly examine each concern raised and where possible locate evidence that either substantiates or refutes the claims made in the report.

All investigations will be conducted without bias, and all parties will be given adequate notice of meetings to discuss the issues raised and have time to prepare. All parties will be given the opportunity to be heard and will have the right to representation or have a support person present. Any individual mentioned in a report of Improper Conduct will be treated fairly at all times.

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In the interests and the perception of objectivity, the Whistleblower Investigation Officer may engage other investigators in relation to an investigation (including independent external investigators). Further, in order to ensure proper process and to prevent actual or perceived unethical conduct, the offices of the Protected Disclosure Officer and Whistleblower Investigation Officer will not be held by the same person.

To avoid jeopardising an investigation, an Eligible Whistleblower who has made a report under this Policy is required to keep confidential the fact that a report has been made (subject to any legal requirements).

It is important to note that CA may, in certain circumstances, not be able to undertake an investigation if it is unable to contact the Eligible Whistleblower (e.g. if the disclosure is made anonymously and the Eligible Whistleblower has refused to provide, or has not provided, a means of contacting them).

Progress and conclusion of investigations

Once an investigation is completed, the Whistleblower Investigation Officer will report the findings of the investigation to the Executive General Manager, Legal & Business Affairs who will report on all whistleblower incidents quarterly to the People, Culture and Sustainability Committee. For the avoidance of doubt, if the Executive General Manager, Legal & Business Affairs is in any way referenced in, or implicated by, the Improper Conduct, findings will be provided directly to the Chair of the People, Culture and Sustainability Committee.

If the Executive General Manager, Legal & Business Affairs (or Chair of the People, Culture and Sustainability Committee, as appropriate) is satisfied that Improper Conduct has occurred, they will make a recommendation, to either the Chief Executive Officer or the Chair, as to the action which should be taken. The findings of the investigation will also be reported to the People, Culture and Sustainability Committee.

Individuals identified by a report

CA will make every effort to ensure that natural justice and procedural fairness is afforded to a person mentioned in, or who is the subject of, a report of Improper Conduct that qualifies for protection under the Act.

Where an investigation does not result in a finding of Improper Conduct being made, the fact that the investigation has been carried out, the results of the investigation and the identity of the person who is the subject of the disclosure or mentioned in the disclosure, will remain confidential.

The investigation will be conducted without bias and any person against whom an allegation is made will be informed of the allegations and given the opportunity to respond prior to a determination being made.

Any substantiated reports will be managed in line with other applicable CA codes and policies, and appropriate action (including disciplinary action as required) will be taken in relation to the substantiated conduct.

10 COMMUNICATION TO ELIGIBLE WHISTLEBLOWERS

Where practicable and appropriate (assuming the Eligible Whistleblower is identifiable), an Eligible Whistleblower will, where appropriate, be regularly updated within a reasonable period of making the report. This may include advising:

- (a) whether an investigation has been undertaken;
- (b) whether the investigation has been completed; and

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- (c) what action is to be taken to address the Reportable Conduct, subject to any applicable confidentiality, privacy and other relevant considerations.

For the avoidance of doubt, if an Eligible Whistleblower has disclosed on an anonymous basis, CA may not be in a position to advise the Eligible Whistleblower of the outcome of any investigation. A failure to notify the Eligible Whistleblower as a result will not of itself give rise to a public interest disclosure and CA will make every endeavour to contact Eligible Whistleblowers through anonymous channels where necessary.

11 BREACH OF POLICY

A substantiated breach of this Policy will be considered serious and appropriate disciplinary action will be taken which may include a verbal warning, written warning, or termination of employment.

12 RELATED LEGISLATION AND STANDARDS

This document will be made available on the CA intranet and CA website and must be read and implemented in conjunction with:

- (a) Corporations Act 2001 (Cth) as amended by the Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 (Cth); and
- (b) Other relevant Federal, State or Territory legislation or regulations.

CA will periodically provide training and support to CA Persons about this Policy and new staff inductions will include education about this Policy.

The effectiveness of this Policy will be monitored and reviewed periodically and amendments to the terms of this Policy will be amended as required from time to time.

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Schedule 1 – Protected Disclosure Officers

CA Department	Protected Disclosure Officer
Integrity	Head of Integrity Jacqui Partridge Email: Jacqui.partridge@cricket.com.au Phone: +61 3 8538 9863
Legal	Executive General Manager Legal & Business Affairs, Company Secretary Kate Ingber Email: Kate.ingber@cricket.com.au Phone: +61 3 9653 8891
People & Culture	Chief People & Strategy Officer Jodie Newton Email: Jodie.newton@cricket.com.au Phone: +61 8 8300 3870 Head of People & Culture Brooke Adams Email: Brooke.adams@cricket.com.au Phone: +61 3 9653 8826
Risk & Procurement	Head of Risk Stacey Conlin Email: Stacey.conlin@cricket.com.au Phone: +61 439 651 177

The Protected Disclosure Officer named above includes the person acting in this role, or a representative of the Protected Disclosure Officer as nominated in writing by the Protected Disclosure Officer.

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Schedule 2 – Definitions

For the purpose of this Policy and unless the context otherwise requires, the following definitions apply:

Act means the *Corporations Act 2001 (Cth)*

CA means the entity Cricket Australia (ABN 53 006 089 130) of 60 Jolimont Street, East Melbourne, Victoria 3002.

Eligible Recipient is defined at clause 6 of this Policy.

Eligible Whistleblower is defined at clause 3 of this Policy.

False Report is defined in clause 4.2 of this Policy.

Improper Conduct is defined in clause 4.1 of this Policy.

Personal Work-Related Grievance is defined at clause 5 of this Policy.

Protected Disclosure is defined at clause 3 of this Policy.

Protected Disclosure Officer means a person specified in Schedule 1 to this Policy, eligible to receive disclosures of Improper Conduct within CA.

Whistleblower Investigation Officer is defined in clause 9 of this Policy.