

This policy and related procedures are applicable to the CHL group of companies (CHL) in Australia, including: Community Housing Ltd, Community Housing (Vic) Ltd, Community Housing Investment (VIC) Ltd, Community Housing (Tas) Ltd, Community Housing (Qld) Ltd, Community Housing (WA) Ltd, Community Housing Investment (WA) Ltd, Community Housing (SA) Ltd, Horizon Housing Realty Ltd, Australian Affordable Housing Securities Ltd, Community Housing Investment (QLD) Ltd, Community Housing Investment (NSW) Ltd, Community Housing (NT) Ltd, Community Housing (Subi East) Ltd, Community Housing (Homes For Regions) Ltd, Building Communities Housing Ltd and any other entities within CHL which adopt this policy.

Purpose and scope

This policy sets out CHL's commitment to providing a safe and lawful process for reporting serious misconduct or wrongdoing (**Reportable Conduct**) and outlines the protections and support available to those who make a report under this policy (**Whistleblowers**).

CHL promotes a culture of integrity, accountability, and transparency where people feel valued, safe to speak up, and supported to act ethically.

This policy does not replace existing internal reporting mechanisms (such as grievance, discrimination, fraud, theft, or bullying processes). Employees, contractors, and other associates are encouraged to use those processes in the first instance. This policy applies where a person makes a Protected Disclosure on Reportable Conduct under legislation. Nothing in this policy is intended to restrict eligible Whistleblowers from contacting a law enforcement body or relevant regulation.

This policy does not apply to customers. Customers should refer to the *Feedback and Complaints Policy* for submitting concerns or feedback.

Definitions

Whistleblower: A Whistleblower is a person who makes, or attempts to make, a disclosure of a "Reportable Conduct". A Whistleblower may be:

- current or former employees, officers, contractors, consultants, and volunteers of CHL or related entities
- an associate of CHL or related entities
- current or former suppliers of goods or services
- their relatives, dependents or spouses of the above
- any other individual prescribed under section 1364 of the Corporations Act 2001 (Cth).

Reportable Conduct: Reportable conduct (also known as disclosable matters) refers to any information, actual concern or concern on reasonable grounds to suspect relating to misconduct, whether or not such misconduct is in breach of any law, or an improper state of affairs or circumstances within or involving the CHL Group. Such conduct may include, but is not limited to:

- illegal, fraudulent, or negligent activity
- breach of trust, duty or law
- criminal conduct or abuse of power
- breach of tax laws or tax avoidance
- conduct endangering public health, safety or the financial system
- failure to comply with any legal or regulatory obligations
- detrimental conduct against a person making or intending to make a disclosure
- any other conduct prescribed by law or regulation to be reportable.

Protected Disclosure: A disclosure of Reportable Conduct made by an eligible Whistleblower to an eligible recipient, protected by law under the *Corporations Act 2001*, *Taxation Administration Act 1953*, or other relevant legislation.

Personal Work-Related Grievance: A grievance that relates to an individual's current or former employment and has implications only for the individual personally, such as interpersonal conflicts, decisions about terms on engagement, transfer, promotion, or performance management.

Personal work-related grievances are generally not Reportable Conduct and are not protected disclosures under this policy unless:

- the grievance includes information about Reportable Conduct or forms part of a mixed report
- the disclosure relates to a breach of employment or other laws punishable by imprisonment for 12 months or more, or conduct that represents a danger to the public
- the Whistleblower suffers, or is threatened with, detriment for making a disclosure
- the disclosure is made to a legal practitioner for the purpose of obtaining legal advice or representation about whistleblower protections.

Eligible recipient: A person or entity authorised to receive whistleblower disclosures under this policy and applicable legislation. See section 2 of this Policy 'Reporting a disclosure'.

Disclosures Not Covered by This Policy

Where a disclosure does not pertain to Reportable Conduct or if the concern raised does not meet the criteria for protection under the *Corporations Act 2001* (Cth) (i.e. it is not a "Protected Disclosure"), it will not attract whistleblower protections under that legislation.

In such cases:

- the individual will be advised that the disclosure does not qualify for statutory protection, and
- the concern will still be addressed through the most appropriate alternative process.

Personal work-related grievances that relate solely to an individual's employment will generally be managed under CHL's internal complaints processes, unless the matter qualifies for protection under whistleblower legislation.

CHL encourages all individuals to raise concerns in good faith and will not tolerate victimisation or retaliation against anyone who does so honestly, regardless of whether statutory whistleblower protections apply.

Policy statements

1. Commitment to protection

- 1.1. Disclosures made under this policy are protected where they are made honestly and on reasonable grounds, even if subsequent investigation determines that the concerns are not substantiated.
- 1.2. CHL is legally required to protect the identity of Whistleblowers and must not disclose:
 - the Whistleblower's identity, or
 - information likely to lead to their identificationexcept where disclosure is made to ASIC, APRA, the Australian Federal Police, or a legal practitioner for legal advice.
- 1.3. Unauthorised disclosure of a Whistleblower's identity or identifying information is an offence under the *Corporations Act 2001* (Cth) and may result in civil and criminal penalties. If a Whistleblower believes there has been a breach of confidentiality, they may lodge a complaint through the *Internal Complaints Process* or notify the relevant regulator.
- 1.4. Whistleblowers are protected from civil, criminal, and administrative liability for making a Protected Disclosure under this policy. These protections do not grant immunity for any misconduct engaged in by the Whistleblower that is revealed through the disclosure.
- 1.5. Deliberately false or malicious disclosures are not protected and may result in disciplinary action.

2. Reporting a disclosure

- 2.1. To qualify for protections, a Whistleblower must make a disclosure directly to CHL's eligible recipients, whose role is to receive disclosures.
- 2.2. Eligible Whistleblowers may report concerns through CHL's independent whistleblowing service, operated by KPMG Forensic Pty Ltd ("KPMG"), by one of the following methods:
 - FairCall Hotline: 1800 500 965
 - Online: <https://kpmgfaircall.kpmg.com.au/CHL>
 - Mail: The FairCall Manager, KPMG Forensic, PO Box H67, Australia Square, Sydney NSW 1213.
- 2.3. Reports to KPMG can be made anonymously and outside business hours. KPMG will triage the report to two CHL nominated eligible recipients of disclosures, being:
 - The Chief People Officer or Head of People and Culture; and
 - The Chief Governance Officer.
- 2.4. Alternatively, disclosures may be made:
 - Internally, to eligible internal recipients:
 - a CHL Officer (e.g., Director, Chief Executive Officer, or Company Secretary)
 - a Senior Manager / Executive of CHL
 - CHL's Auditor or a member of the audit team
 - Externally, to:
 - a prescribed regulator, including ASIC or APRA (for Corporations Act matters) or the Australian Taxation Office (for taxation matters)
 - a legal practitioner for the purpose of obtaining legal advice or representation
 - in limited circumstances, a Member of Parliament or journalist, where permitted under public interest or emergency disclosure provisions.
- 2.5. Where any report relates to CEO or Chair of Directors the CHL Group, disclosures can also be made to the chairs of the Board Audit, Risk and Compliance Committee or the Board Governance Committee.
- 2.6. All disclosures will be treated in a confidential and sensitive manner.
- 2.7. If a Whistleblower prefers to remain anonymous or place restrictions on who is informed of their identity, they need to communicate their intention in the first possible opportunity.
- 2.8. Whistleblowers who choose to remain anonymous are entitled to the same protections under this policy and legislation as identified Whistleblowers.
- 2.9. Anonymous reports will be assessed based on the seriousness and credibility of the issues raised.
- 2.10. The information received from the Whistleblower or any information that could lead to their identification, will not be shared unless permitted or compelled by law, with consent or if does not include disclosure of the Whistleblower's identity or information likely to identify them, CHL has taken reasonable steps to reduce the risk that the discloser will be identified and it is reasonably necessary for investigating the issues or as expressly allowed under legislation.

3. Investigations of allegations

- 3.1. All disclosures will be assessed to determine whether they qualify for protection and whether a formal investigation is required.
- 3.2. The timeframe for responding, investigating and resolving a disclosure will vary based on the complexity of the information disclosure. However, all Investigations will be conducted promptly, impartially, and by appropriately qualified internal or external investigators.
- 3.3. CHL will endeavour to respond to a disclosure within 3 business days of becoming aware and begin an investigation, if required, within 10 business days of becoming aware of a disclosure.

- 3.4. The investigation will be conducted in a fair and impartial manner, following the principles of natural justice, ensuring fairness, confidentiality, and the right of response for anyone accused.
- 3.5. Both the Whistleblower and any person subject to the report will be supported throughout the process. Findings will be reported to relevant senior leadership or the Board (without disclosing identities), and corrective or disciplinary actions will be taken if required.
- 3.6. Whistleblowers will be informed of progress and outcomes where their identity is known and as appropriate.
- 3.7. An anonymous Whistleblower may refuse to answer any questions throughout the investigation process if they feel that the answer could reveal their identity.
- 3.8. An investigation may be limited where CHL is unable to contact the discloser.

4. Protection for the Whistleblower

- 4.1. CHL will take all reasonable steps to reduce the risk of identification and detriment to a Whistleblower, including where appropriate:
 - restricting access to information on a need-to-know basis
 - redacting or minimising personal information
 - separating the Whistleblower from individuals involved in the disclosure
 - implementing alternative reporting or supervision arrangements
 - monitoring the Whistleblower's welfare following a disclosure
 - securely storing documents and other materials relevant to the disclosure.
- 4.2. Detriment includes, but is not limited to, dismissal, demotion, harassment, discrimination, intimidation, or harm to reputation or financial position.
- 4.3. Retaliation, detriment or threat of detriment is strictly prohibited and may result in disciplinary action.
- 4.4. Whistleblowers and any employees affected by a disclosure will be offered access to confidential counselling or support services through CHL's Employee Assistance Program (EAP).
- 4.5. CHL's Whistleblower Protection Officer's (WPOs) are responsible for safeguarding the interests of Whistleblowers and ensuring compliance with legal obligations. For the purposes of this policy, CHL's WPO's are:
 - People and Culture Manager
 - Safety and Wellbeing Manager
- 4.6. CHL's WPO can be contacted for additional information before an individual makes a disclosure.

5. Compensation and remedies

- 5.1. A Whistleblower may seek compensation or other remedies through the courts if they suffer loss, damage, or injury because of a disclosure.
- 5.2. CHL may be liable for the conduct of its employees or agents who cause detriment to a Whistleblower, unless CHL can demonstrate it took all reasonable steps to prevent the conduct.
- 5.3. Whistleblowers seeking compensation or other remedies are encouraged to seek independent legal advice.

6. Fair treatment of individuals named in a disclosure

- 6.1. CHL is committed to fair treatment of individuals named in disclosures, including confidentiality, objective assessment, procedural fairness, and disciplinary action only where allegations are substantiated.
- 6.2. A disclosure does not, of itself, imply wrongdoing.

7. Recordkeeping and confidentiality

- 7.1. All records relating to disclosures and investigations will be securely stored, restricted to authorised personnel, and retained in accordance with the *Records Management Policy* and privacy obligations.
- 7.2. CHL has appointed KPMG as an Eligible Recipient to receive disclosures under the Corporations Act 2001 (Cth) and/or Taxation Administration Act 1953 (Cth). KPMG will treat all disclosures in accordance with the following policy: <https://home.kpmg/au/en/home/misc/privacy-faircall.html>.

8. Training and awareness

- 8.1. CHL will provide ongoing training for employees, managers, officers, and eligible recipients to ensure understanding of this policy, reporting channels, and legal protections.
- 8.2. This policy is made available to all officers and employees of CHL via the intranet and other internal communication channels and is provided to new employees as part of induction.
- 8.3. The policy is also available to eligible external parties via CHL's website.

9. Board oversight

- 9.1. This policy is a management-owned policy approved by the Board. Any amendments require Board approval. The Board retains oversight of this policy.
- 9.2. De-identified whistleblower matters, trends, and outcomes will be reported to the Board (via the Audit, Risk and Compliance Committee) to support oversight and continuous improvement.

Accountability

Chief Governance Officer – accountable for authorising submission to the Executive Team for final policy endorsement by the Chief Executive Officer.

Chief People Officer – responsible for reviewing and maintaining the policy, overseeing its effective implementation and providing advice.

All Employees – responsible for complying with the policy, actively supporting its implementation, and contributing to the achievement of its objectives. Failure to adhere to this policy may result in disciplinary action, up to and including termination of employment.

Related documents

- Appropriate Workplace Behaviour Policy
- Code of Conduct Policy
- Employee Disciplinary Policy
- Feedback and Complaints Policy
- Health, Safety and Wellbeing Policy
- Records Management Policy
- Privacy Policy
- Whistleblower Procedure

Legislation

- Corporations Act 2001 (Cth)
- Taxation Administration Act 1953 (Cth)
- ASIC Regulatory Guide 270 – Whistleblower Policies

Approved by

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