



Whistleblowers Policy

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1. PURPOSE

L.C. Dyson's Bus Services Pty Ltd (Dysons) is committed to maintaining the highest standards of conduct and ethical behaviour in all its business activities and to promoting and supporting a culture of honest and ethical behaviour, corporate compliance and good corporate governance and risk management.

The purpose of this policy is to:

- encourage disclosures of wrongdoing.
- help deter wrongdoing, in line with Dysons risk management and governance framework.
- ensure individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported.
- ensure disclosures are dealt with appropriately and on a timely basis.
- provide transparency around Dysons framework for receiving, handling and investigating disclosures.
- support Dysons values, reputation, the 'Dyson Way', and
- meet Dysons legal and regulatory obligations.

2. WHO DOES THIS POLICY APPLY TO?

This policy applies to any "eligible whistleblower".

An "eligible whistleblower" is an individual who is, or has been, any of the following in relation to Dysons:

- an officer or employee
- a supplier of services or goods to Dysons (including the supplier's employees or contractors)
- a director or secretary of Dysons
- a relative, dependant or spouse of an individual who fits any of the above descriptions

3. WHO IS NOT COVERED BY THIS POLICY?

While competitors and customers or clients may observe or be affected by the company's misconduct, they will not be able to access the whistleblower protections if they are not otherwise "insiders" to the company. (They may of course have legal rights and remedies under different laws).

4. WHAT IS REPORTABLE CONDUCT?

Reportable Conduct is anything an eligible whistleblower has reasonable grounds to suspect, in relation to Dysons is:

- illegal, unethical or improper conduct (including misconduct) or
- an improper state of affairs or circumstances
- conduct that constitutes an offence against the Corporations Act 2001 (Cth).
- contravenes or is an offence against any other Commonwealth law that is punishable by imprisonment for a period of 12 months or more.

- a serious breach of any internal Dysons policy, including the 'Dyson Way'.
- represents a danger to the public or the stability of, or confidence in, the financial system (even if the conduct does not involve a contravention of a particular law).
- a systemic issue that a regulator should know about to properly perform its functions, or
- 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 is planning to make, a disclosure of Reportable Conduct.

Examples of Reportable Conduct includes but are not limited to conduct that is illegal, unethical or improper such as:

- dealing in, or use of, illicit drugs, violence or threatened violence and criminal damage against property.
- offering or accepting bribes in return for business favours or commercial advantage.
- unauthorised distribution or sale of personal information.
- price fixing and financial misreporting.
- failure to comply with, or breach of, any other legal or regulatory requirements.
- fraud, money laundering or misappropriation of funds.

A whistleblower does not have to prove the allegations and will still qualify for protection **provided** they have reasonable grounds for making the disclosure even if the disclosure turns out to be incorrect.

5. PERSONAL WORK-RELATED GRIEVANCES

Reportable Conduct does not generally include matters that relate solely to personal work-related grievances or employment disputes.

Examples of these include interpersonal conflicts with other employees, transfer and promotion decisions, decisions regarding the terms and conditions of employment, decisions regarding suspension and termination of employment and disciplinary decisions.

These issues should be raised with the People, Culture & Values team.

However, a personal work-related grievance will still qualify for whistleblower protection if:

- a) it also includes information about misconduct.
- b) Dysons has breached employment or other laws punishable by imprisonment for a period of 12 months or more, engaged in conduct that represents a danger to the public or the disclosure relates to information that suggests misconduct beyond the whistleblowers personal circumstances.
- c) the whistleblower suffers from or is threatened with detriment for making a disclosure. or
- d) the whistleblower seeks legal advice or legal representation about the operation of the whistleblower protections under the Corporations Act.

Dysons discourages deliberate false reporting (that is, reports that the whistleblower knows or ought to know to be untrue).

An eligible whistleblower does not need to prove the allegations but is encouraged to provide evidence in support of their disclosure if it is safely available. An eligible whistleblower can still qualify for protection even if their report of Reportable Conduct turns out to be incorrect or unsubstantiated provided they have a **reasonable basis** for making the report.

6. WHO CAN DISCLOSURES BE MADE TO?

Dysons encourages eligible whistleblowers to report actual or suspected wrongdoing via our whistleblowing service, **Your Call**.

Your Call is an external, independent provider that provides confidential reporting of whistleblower concerns related to this policy. Reporting to Your Call also enables the report to be made anonymously if you choose to do so.

Your Call reporting options include:

Hotline (7am to midnight AEST on business days)	Online	Unique Identifier Code
https://www.yourcall.com.au/report	1300 790 228	DYSON

Online reports can be made via the website address listed above. You will be required to enter Dyson Group unique identifier code **DYSON**.

Your Call remains the intermediary at all times, receiving and forwarding communication between all parties. The Dyson Group Officers who will have access to reports include:

- General Manager People, Culture & Values
- People & Culture Manager
- General Manager Governance & Compliance
- Chief Financial Controller

Your Call can circumvent any of the above Officers upon request.

There is the ability to securely upload any relevant documentation and/or material relevant to the disclosure.

After making a disclosure, a unique Disclosure Identification Number (DIN) will be provided and access to a secure online Message Board.

The Message Board allows ongoing anonymous communication with Your Call and/or Dyson Group.

Your Call remains the intermediary at all times, receiving and forwarding communication between all parties. The Message Board can be used to receive updates, share further information/evidence and request support or report retaliation. If you cannot access the Message Board, you can contact Your Call via phone (above) for verbal updates.

National Relay Service

If you are deaf, or have a hearing or speech impairment, you can contact Your Call online or through the National Relay Service. Simply choose the contact method at www.relayservice.gov.au and request Your Call's hotline 1300 790 228.

If you have difficulty speaking or understanding English, contact us through the [Translating and Interpreting Service](#) (TIS) 131 450 and ask for Your Call on 1300 790 228.

Alternatively, you may choose to make your disclosure to any of the following 'Eligible Recipients':

- a director, officer or senior manager of Dysons, or
- the internal or external auditor of Dysons.

Disclosures may be made in person, by post or by email. When making a disclosure to an Eligible Recipient, Dysons encourage you to refer to this policy and claim protection under this policy.

You may also make disclosures of what you consider to be Reportable Conduct to:

- a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions in the Corporations Act (even if the legal practitioner concludes that a disclosure is not in fact Reportable Conduct)

- to regulatory bodies such as the Australian Securities and Investment Commission (ASIC), the Australian Taxation Office (ATO) or any other regulatory body prescribed by the regulations and such disclosure will still qualify for protection under the Corporations Act even where there has been no prior disclosure to Dysons.

7. PUBLIC INTEREST AND EMERGENCY DISCLOSURES

The law will protect you as a whistleblower if you report your concerns about an emergency or matter in the public interest to a journalist or parliamentarian, in certain limited circumstances.

If you go public with your concerns in another way, such as by posting on social media, you will not be covered.

(a) Emergency disclosures

You must have reasonable grounds to believe your initial report concerns substantial and imminent danger to the health or safety of one or more people or to the natural environment.

If so, you can report to a journalist or parliamentarian after you write to ASIC or APRA to let them know you intend to make an emergency disclosure.

(b) Public interest disclosures

You must have reasonable grounds to believe that:

- action to address concerns raised in your initial report is not being or has not been taken, and
- reporting your concerns to a journalist or parliamentarian is in the public interest.

If so, you must wait 90 days from when you first reported to ASIC or APRA, then you must write to the regulator you initially contacted again to let them know you intend to make a public interest disclosure.

If you believe you may be eligible to make a public interest disclosure, we encourage you to seek independent legal advice regarding this process.

8. WHAT PROTECTION WILL I HAVE AS A WHISTLEBLOWER?

Disclosures under this policy can be made anonymously, confidentially, securely and outside of normal business hours. It is important to note that anonymous disclosures are still protected under the Corporations Act and this policy.

A whistleblower can choose to remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised and can refuse to answer questions that the whistleblower feels could reveal their identity. Dysons will respect the whistleblowers right to not identify themselves. However, whistleblowers should be aware that this may affect the ability of Dysons to investigate the report.

Dysons encourages whistleblowers who would prefer to remain anonymous to maintain ongoing two-way communication with Dysons so that we can ask to follow up questions and provide feedback.

Where a disclosure comes from an email address from which Dysons cannot determine the identity of the Discloser, the disclosure will be treated as anonymous. If a whistleblower makes a report of Reportable Conduct in accordance with this policy, the disclosure will be treated as confidential in accordance with legal requirements. It is illegal for a person to disclose a whistleblowers identity or information that is likely to lead to identification of their identity, unless:

- the whistleblower gives consent.
- the disclosure is made to a professional legal adviser for the purpose of obtaining legal advice or representation, or to authorised bodies such as ASIC, ATO or a member of the Australian Federal Police.

However, a person who is dealing with a report of Reportable Conduct may disclose information that is reasonably necessary for the purposes of investigating the report. If this happens, reasonable steps will be taken to reduce the risk that the whistleblower will be identified as a result of the report (for example by removing personal information or other details that are likely to identify the whistleblower).

Regardless of the Eligible Recipient to whom a disclosure is made, a whistleblower has the following protections:

- identity protection (subject to the above).
- protection from detrimental acts or omissions (for example, dismissal, discrimination, harassment, altering an employee's position to their disadvantage etc).
- a right to compensation or other remedies, where the eligible whistleblower suffers loss, damage or injury because of a disclosure, in circumstances where Dysons has failed to take reasonable precautions and exercise due diligence to prevent detrimental conduct; and
- protection from civil, criminal and administrative liability in respect of their disclosure.

The following are examples of actions that would not be considered detrimental acts or conduct:

- administrative action that is reasonable for the purpose of protecting a whistleblower from detriment (e.g. moving desks or changing line management of a whistleblower); and
- managing a whistleblowers unsatisfactory work performance, if the action is in line with Dysons performance management framework.

Whistleblowers should seek independent legal advice in the event of concern.

The protections above will continue to apply to a whistleblower, even if the disclosure of Reportable Conduct turns out to be incorrect. However, a whistleblower is not protected for making a false claim so the whistleblower must have **reasonable grounds** to suspect the concerns that they report.

9. HOW WILL THE MATTER BE INVESTIGATED?

After receiving a report about Reportable Conduct we will assess the information provided to determine whether it is a report to which this policy applies, how it will be handled and whether an investigation is required.

The precise steps to be taken to investigate a report will differ in individual cases but may include:

1. appointment of an internal or external investigator (if it has been determined that an investigation is required);
2. asking the whistleblower whether they consent to their identity being disclosed to investigate the report;
3. interviewing the whistleblower and any other relevant person to obtain information about the report;
4. review of relevant documents and other information in relation to the report;
5. the investigator making findings regarding the conduct reported.

Generally, if the whistleblower can be contacted, we will confirm receipt of the disclosure within 2 Business Days.

The investigation of a report will commence as soon as reasonably possible from the date Dysons receives it. However, there may be reasons why an investigation may take longer. If Dysons thinks there might be a delay with the investigation, Dysons will tell the person who made the report (where possible).

Where possible and assuming that the identity of the whistleblower is known, the whistleblower will be kept informed of when the investigation process has begun, while the investigation is in progress and after the investigation has been finalised, subject to confidentiality and privacy considerations.

Dysons may decide to act in response to any findings which may include, but is not limited to, disciplinary action, reporting the matter to an appropriate regulator, conducting training or addressing procedural and policy deficiencies.

10. ACCESS TO THIS POLICY

This policy will be available on Dysons internet site at <https://dysongroup.com.au>

11. BOARD OVERSIGHT

Dysons Board may be provided with details of disclosures made in accordance with this policy and any findings made to ensure appropriate oversight of reports and investigation of matters reported under this policy.

If an eligible whistleblower does not provide consent for his or her identity to be disclosed, those persons within Dysons who are handling the report may disclose information to the Board that is reasonably necessary for the purposes of investigating the report, provided that all reasonable steps are taken to reduce the risk that the whistleblower will be identified because of the report.

The Board will monitor Dysons whistleblower practices and procedures to ensure that any broader trends, themes and/or emerging risks highlighted by the disclosures made under this policy are addressed and mitigated as part of Dysons risk management and corporate governance.