

<b>TITLE:</b>	Whistleblower Policy CAIC
<b>CATEGORY:</b>	Human Resources
<b>SUB CATEGORY:</b>	Industrial Relations
<b>EFFECTIVE DATE:</b>	December 2019
<b>REVIEW DATE:</b>	December 2020

## PURPOSE

Casinos Austria International (Cairns) Pty Ltd is committed to values which include demonstrating a high level of trust and integrity in our dealings and relationships. The Whistleblower policy provides a mechanism which encourages, supports and promotes the detection and reporting of corrupt, illegal and or other reportable conduct.

### 1. Who is an eligible Whistleblower?

This policy applies to an individual who is a current or former

- director or officer of Casinos Austria International (Cairns) Pty Ltd
- employee of Casinos Austria International (Cairns) Pty Ltd
- supplier of goods and services (whether paid or unpaid) to Casinos Austria International (Cairns) Pty Ltd
- associate of Casinos Austria International (Cairns) Pty Ltd
- relative of those persons listed above
- dependent of those persons listed above or of such individual's spouse

### 2. What is reportable conduct?

Reportable conduct means any suspected or actual misconduct or improper state of affairs or circumstances in relation to Casinos Austria International (Cairns) Pty Ltd and includes, but is not limited to, any of the following:

- Dishonest, fraudulent, corrupt conduct
- Illegal activity (including theft, drug sale / use, violence or threatened violence and criminal damage against property)
- In breach of legislation including the Corporations Act or offence against any other Commonwealth law punishable by imprisonment for 12 months or more
- Unethical behaviour including breaches of the code of conduct
- Serious misconduct
- Unsafe work-practice
- Danger to the public
- Any other conduct which may cause financial or non-financial loss to the or be otherwise detrimental to the interests of the Casinos Austria International (Cairns) Pty Ltd.

Reportable Conduct generally does not include personal work-related grievances. These are managed under the company's Grievance Procedure.

### 3. Who can I make a report to?

Reports should be made to

Executive Manager Human Resources,  
Email [hrmanager@reefcasino.com.au](mailto:hrmanager@reefcasino.com.au)  
Telephone: +61 (0)7 4030 8877

Reports may also be made to any other Eligible Recipients

- Chief Executive Officer or member of the Executive Leadership Team
- Directors
- External auditor BDO
- Australian Securities and Investment Commission

A Whistleblower can remain anonymous. The company will respect the individual's right not to identify themselves. However, it may mean that any investigation by the company may be limited.

#### **4. Investigation of Reportable Conduct**

The Executive Manager Human Resources will carry out a preliminary review of all matters reported under this policy as soon as practicable after the matter has been reported. If it is decided that the matters raised in the disclosure should be investigated, they will, either conduct a full investigation or commission another staff member or external party to do so.

The Executive Manager Human Resources will keep the Whistleblower informed, unless they have remained anonymous.

The company will ensure fair treatment of those mentioned in disclosure, and to whom such disclosures relate. Investigations will initially be conducted independently of the subject of the allegations. However, the subject of the allegations may be informed of the allegations, if appropriate, and may be given the opportunity to respond and explain the allegations laid against them.

All investigations will be conducted in a thorough, fair and independent manner.

#### **5. Confidentiality and protection of Whistleblower identity**

The company will not share the identity of the Whistleblower or information likely to reveal the Whistleblower's identity without their consent unless it is required or permitted by law.

The company will take reasonable steps to reduce the risk that in investigating a report, it may disclose information that could lead to identification. For example it will endeavour to limit disclosure of information about the report to those who need to know as they are involved or concerned in the matters the subject of the report or who are involved in addressing the report in accordance with this policy.

#### **6. Protection of eligible Whistleblowers from reprisal**

All reasonable steps will be taken to protect anyone who identifies the reportable conduct. Whistleblowers will not be personally disadvantaged by having made the report by dismissal, demotion, any form of harassment, discrimination or current or future bias as appropriate.

Employees found to have taken reprisal actions or victimised the Whistleblower will face disciplinary action, which includes the possibility of dismissal.

#### **7. False and dishonest allegations**

No action will be taken against an employee for making an allegation or raising their concern, even where no wrongdoing is identified.

If an employee makes a false report in bad faith (i.e. false information to get someone else in trouble) disciplinary action may be taken.

#### **8. Statutory protections**

The Corporations Act provides special protections available for an Eligible Whistleblowers (see section 2) who must have reasonable grounds to suspect that the information they are reporting concerns misconduct or an improper state of affairs (see section 3) made to Eligible Recipients (see section 4). The protections available under the Corporations Act to an individual who meets the requirements include:

- the right to have their identity protected in accordance with the provisions of that legislation;
- the right to have information provided as part of the disclosure handled in accordance with the provisions of that legislation;
- the right to be protected from civil, criminal or administrative liability (including disciplinary action) for making disclosure, from contractual or other remedy on the basis of the disclosure and from the admissibility of the information provided in evidence against the person, in each case in accordance with the provisions of that legislation;
- the right to be protected from detrimental treatment or any form of victimisation in accordance with the provisions of that legislation;
- the right to compensation and other remedies in accordance with the provisions of that legislation (including a right not to be required to pay costs incurred by another person when litigation is commenced);
- the right not to be required to disclose their identity before any court or tribunal in accordance with the provisions of that legislation.

The Corporations Act also provides protection for public interest disclosures and emergency disclosures which meet specific requirements prescribed by the Corporations Act.

The Taxation Administration Act also provides protection for disclosures of information which indicates misconduct or an improper state of affairs in relation to the tax affairs of an entity or an associate of an entity where the discloser considers that the information may assist the eligible recipient to perform functions or duties in relation to the tax affairs of the entity or an associate.

**9. How is the policy made available?**

The policy will be made available on the company's website and intranet.

Employees will be trained upon induction and then refreshed yearly and notified via the "policy of the month" strategy.

**10. Annual Review**

This policy will be reviewed annually.

Approved by the Board 4 December, 2019