

Whistleblower Policy

Mounties Group is committed to operating in accordance with its social license, community expectations and in compliance with all applicable laws, rules and regulations. Mounties Group will not tolerate unethical, unlawful or undesirable conduct and is committed to the protection of our integrity, values, staff welfare and business relationships. Mounties Group encourages a corporate culture supporting and valuing the reporting of improper conduct, corruption and serious waste.

Such an undertaking prohibits fraudulent practices by any of its board members, officers, employees or volunteers. This policy's purpose is to outline the procedure for any person associated with Mounties Group to report actions that a person reasonably believes may violate a law, regulation, or which may constitute fraudulent accounting or other practices. This policy applies to any matter which is related to Mounties Group's business and does not relate to private acts of an individual not connected to the business of Mounties Group.

Mounties Group recognises that the most common method of detecting improper conduct is by notification of the improper conduct by its own team members. Mounties Group is committed to maintaining an environment in which all staff, volunteers, casual staff and contractors are able to report, without fear of retaliatory action, concerns about any serious instances of improper conduct that they believe may be occurring. If necessary, reports can also be made anonymously through Mounties Group's independent, impartial whistleblowing service.

Whistleblowing can be defined as the deliberate, voluntary disclosure of individual or organisational improper conduct by a person who has or had privileged access to data, events or information about an actual, suspected or anticipated improper conduct or wrongdoing within or by an organisation that is within its ability to control.

Who is an Eligible Whistleblower who may make a report?

To be eligible for whistleblower protection under this policy you must be a current or former:

- employee;
- officer (director or secretary);
- contractor, or an employee of a contractor;
- suppliers, or an employee of a supplier (including volunteer staff);
- associate;
- spouse, relative or dependant of any of the above.

In choosing to report under this Policy, Mounties Group will extend the relevant rights including protection from retaliation and victimisation if you are reporting Improper Conduct (Disclosable Matter) as set out below.



Locked Bag 1
Wetherill Park BC NSW 2164
101 Meadows Road
Mt Pritchard NSW 2170
Australia

Telephone

(02) 9822 3555

Facsimile

(02) 9610 6832

Email

info@mountiesgroup.com.au

www.mountiesgroup.com.au

mounties

**mounties
bowling club**

harbord diggers

**manly
bowling club**

club italia

mekong

triglav

Mt Pritchard & District Community Club Ltd
ACN 000 458 622 ABN 98 000 458 622

Improper Conduct (Disclosable Matters)

Improper conduct (Disclosable Matters) include any conduct that is:

- dishonest, fraudulent or corrupt;
- illegal, such as theft, drug sale or use, violence, harassment, criminal damage to property or other breaches of state or federal legislation;
- behaviour that is discriminatory, vilifying, victimising, harassing or bullying;
- wilful breach of Mounties Group's code of conduct;
- unethical, such as dishonestly altering company records, engaging in questionable accounting practices;
- misusing information technology such as IT equipment, social media sites or smart phones;
- potentially damaging to Mounties Group or a Mounties Group employee, such as unsafe work practices or substantial wasting of resources;
- may cause financial loss to Mounties Group or damage its reputation or be otherwise detrimental to Mounties Group's interests;
- 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 be planning to make a disclosure; involving any other kind of serious impropriety;
- an intent or preparation to commit any of the above or suspect or believe any of these maybe committed either now or in the future;
- any other conduct that a person believes is improper or is in breach of Mounties Group policies or procedures; or
- the deliberate concealment of information relating to any of the matters listed above.

Any reports by an eligible whistleblower that are not about the improper conduct (disclosable matters) which are listed above do not qualify for protection under the Corporations Act or this policy. Disclosable matters include conduct that may not involve a contravention of a particular law. For example, information that indicates a significant risk to public safety or the stability of, or confidence in, the financial system is a disclosable matter, even if it does not involve a breach of law.

A disclosure qualifies for protection as a whistleblower under the Corporations Act if they are an eligible whistleblower and:

- (a) they have made a disclosure of information relating to a 'disclosable matter' directly to an 'eligible recipient' (Mounties Group CEO or Stopleveline) or to ASIC, APRA or another Commonwealth body prescribed by regulation;
- (b) they have made a disclosure to a legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the whistleblower provisions in the Corporations Act; or
- (c) they have made an 'emergency disclosure' or 'public interest disclosure'.



Locked Bag 1
Wetherill Park BC NSW 2164
101 Meadows Road
Mt Pritchard NSW 2170
Australia

Telephone
(02) 9822 3555

Facsimile
(02) 9610 6832

Email
info@mountiesgroup.com.au

www.mountiesgroup.com.au

mounties

**mounties
bowling club**

harbord diggers

**manly
bowling club**

club italia

mekong

triglav

Mt Pritchard & District Community Club Ltd
ACN 000 458 622 ABN 98 000 458 622

It is important to note that a discloser can still qualify for protection even if the disclosure turns out to be incorrect, if you believe you have reasonable grounds to suspect misconduct or improper state of affairs or circumstances do not hesitate to make a disclosure.

Personal Work – Related grievances

Disclosures that relate solely to personal work – related grievances, and that do not relate to the detriment or threat of detriment to the discloser, do not qualify for protection under the Corporations Act.

Personal work – related grievances are those that relate to the discloser’s current or former employment and have, or tend to have, implications for the discloser personally, but do not:

- (a) have any other significant implications for the entity (or another entity); or
- (b) relate to any conduct, or alleged conduct, about a disclosable matter.

An example of a personal work – related grievances is an interpersonal conflict between the discloser and another employee.

A personal work – related grievance may still qualify for protection if:

- (a) it includes information about misconduct, or information about misconduct includes or is accompanied by a personal work – related grievance (mixed report);
- (b) the entity 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 discloser’s personal circumstances;
- (c) the discloser suffers from or is threatened with detriment for making a disclosure; or
- (d) the discloser seeks legal advice or legal representation about the operation of the whistleblower protections under the Corporations Act (even in the event that the legal practitioner concludes that a disclosure does not relate to a ‘disclosable matter’)

If a person has a reasonable belief that anyone associated with Mounties Group has engaged in any action that violates any applicable law, or regulation, including those concerning accounting and auditing, or constitutes a fraudulent practice, that person is expected to immediately report such information to the Chief Executive Officer (in person or through post or email ceo@mountiesgroup.com.au). If the person does not feel comfortable reporting the information to the Chief Executive Officer, Mounties Group has engaged the services of Stopleveline for the provision of these Whistleblowing Services. The Chief Executive Officer and Stopleveline are “eligible recipients”, along with the other “eligible recipients” detailed later in this policy, and are able to receive disclosures that qualify for protection. A whistleblower must make a disclosure directly to an “eligible recipient” to be able to qualify for protection as a whistleblower under the Corporations Act or Taxation Administration Act.

This policy is concerned about reporting matters in the public interest and is not intended to replace other reporting structures such as those for dispute resolution, complaints/grievances, equal opportunity, discrimination, harassment or bullying except where the issue is of a serious nature where existing reporting systems have failed to process the issue or have processed it in an inappropriate, unfair or biased manner.



Locked Bag 1
Wetherill Park BC NSW 2164
101 Meadows Road
Mt Pritchard NSW 2170
Australia

Telephone

(02) 9822 3555

Facsimile

(02) 9610 6832

Email

info@mountiesgroup.com.au

www.mountiesgroup.com.au

mounties

**mounties
bowling club**

harbord diggers

**manly
bowling club**

club italia

mekong

triglav

Mt Pritchard & District Community Club Ltd
ACN 000 458 622 ABN 98 000 458 622

The provisions of this policy are not designed to question financial or business decisions taken by Mounties Group, or to be used to reconsider any matters which have already been addressed under other policies and procedures.

Accountability / Responsibility / Point of Contact

All employees are required to be aware of this policy and procedure and its location and follow it where appropriate.

This policy applies to all personnel of Mounties Group and subsidiaries / business units / divisions.

The People & Culture Leader is responsible for the oversight of this policy and is hereafter described for the purpose of management of the policy and reports / disclosures / complaints received, as the Disclosure Coordinator.

Any individual who detects or has reasonable grounds for suspecting improper conduct is encouraged to raise any concerns with their immediate manager through normal reporting channels (see table below).

It is expected that all team members will use the appropriate mechanism to raise their complaint. However, Mounties Group understands that circumstances may exist where the person does not feel comfortable in reporting to their immediate supervisor / manager or believe their concerns have not been adequately addressed or not addressed impartially. In these cases, the organisation has engaged the services of an experienced independent, impartial whistleblowing service (Stopline Pty Ltd) where disclosures can be made, anonymously if required. Disclosures which are made anonymously can still be protected under the Corporations Act. A discloser may choose to remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised. A discloser may choose to refuse to answer questions that may reveal their identity at any time, including during follow up conversations. It is recommended by Mounties Group that disclosers who wish to remain anonymous maintain communication with the eligible recipient of Mounties Group. Should you provide your personal details these will be kept confidential. Mounties Group will determine whether a disclosure made with personal details provided, qualifies for protection under the applicable legislation.

Reports of improper conduct (disclosable matters), if not made to an immediate supervisor or manager can also be made to the contact persons set out in the table below or the Disclosure Coordinator. If anonymity is desired all disclosures should be made to the whistleblowing service.

Issue	Policy Reference	Contact
Workplace conflict or grievance, dispute resolution	Grievance Procedure	Immediate Supervisor/Manager → People & Culture Team
Harassment, discrimination or bullying	Anti-Harassment Anti-Discrimination Anti-Bullying	Immediate Supervisor/Manager → People & Culture Team
Workplace Health & Safety	Workplace Health and Safety	Immediate Supervisor/Manager → <u>Workplace Safety Representative</u> → People & Culture Team



Locked Bag 1
Wetherill Park BC NSW 2164
101 Meadows Road
Mt Pritchard NSW 2170
Australia

Telephone
(02) 9822 3555
Facsimile
(02) 9610 6832
Email
info@mountiesgroup.com.au

www.mountiesgroup.com.au

- mounties**

- mounties bowling club**

- harbord diggers**

- manly bowling club**

- club italia**

- mekong**

- triglav**

Mt Pritchard & District Community Club Ltd
ACN 000 458 622 ABN 98 000 458 622

Violation or suspected violation of any applicable law or regulation including those concerning accounting and auditing, or constitutes a fraudulent practice	Whistle Blower	Chief Executive Officer → Whistleblower Service (Stoplevel Pty Ltd)
Matters relating to CEO / General Manager / Board	Whistle Blower	Whistleblower Service (Stoplevel Pty Ltd)



Locked Bag 1
Wetherill Park BC NSW 2164
101 Meadows Road
Mt Pritchard NSW 2170
Australia

Telephone
(02) 9822 3555
Facsimile
(02) 9610 6832
Email
info@mountiesgroup.com.au

www.mountiesgroup.com.au

Contacting Stoplevel

Stoplevel have several methods of receiving a disclosure although a telephone call is preferred so that sufficient information can be obtained to enable the conduct of an appropriate investigation. Disclosures may be made outside of business hours. Stoplevel do not have incoming or outgoing caller ID.

- Telephone Toll Free: 1300 30 45 50
- Locked Bag Mail: Mounties Group C/- The Stoplevel Locked Bag 8 Hawthorn VIC 3122
- Facsimile: Mounties Group C/- The Stoplevel (03) 9882 4480
- Email: mountiesgroup@stoplevel.com.au
- Online: <http://mounties.stoplevelreport.com>

- mounties***

- mounties
bowling club***

- harbord diggers***

- manly
bowling club***

- club italia***

- mekong***

- triglav***

Mt Pritchard & District Community Club Ltd
ACN 000 458 622 ABN 98 000 458 622

Confidentiality / Privacy

If a person makes a report of alleged or suspected improper conduct under this policy, Mounties Group will endeavour to protect that person's identity from disclosure as Mounties Group has legal obligations under the Corporations Act to protect the confidentiality of a discloser's identity. Identifying information will be restricted to a need to know basis. Mounties Group will not disclose the person's identity unless:

- the person making the report consents to the disclosure;
- the disclosure is required or authorised by law;
- in some circumstances the disclosure is necessary to further the investigation.
- in each circumstance the matter has been discussed with the person making the disclosure before any identifying information is provided.

Reports made under this policy will be treated confidentially. However, when a report is investigated it may be necessary to discuss the allegations with people such as other Mounties Group personnel, external persons involved in the investigation process, as part of reporting by the CEO to the Board of Mounties Group and, in appropriate circumstances, law enforcement agencies. Your Confidentiality will be protected as:

- a) all personal information or reference to the discloser witnessing an event will be redacted;
- b) the discloser will be referred to in a gender-neutral context;
- c) where possible, the discloser will be contacted to help identify certain aspects of their disclosure that could inadvertently identify them;
- d) disclosures will be handled and investigated by qualified staff;
- e) all paper and electronic documents and other materials relating to disclosures will be stored securely;
- f) access to all information relating to a disclosure will be limited to those directly involved in managing and investigating the disclosure;
- g) only a restricted number of people who are directly involved in handling and investigating a disclosure will be made aware of a discloser's identity (subject to the discloser's consent) or information that is likely to lead to the identification of the discloser;
- h) communications and documents relating to the investigation of a disclosure will not to be sent to an email address or to a printer that can be accessed by other staff; and

each person who is involved in handling and investigating a disclosure, or have oversight of the disclosure and investigation, will be reminded about the confidentiality requirements, including that an unauthorised disclosure of a discloser's identity may be a criminal offence.

At some point in time it will be necessary to disclose the allegation and the substance of a report to the person who is the subject of the report to ensure compliance with the principles of natural justice and procedural fairness. The person who is the subject of a report will be treated fairly throughout the investigation process, including where those individuals are implicated in wrongdoing. An implicated person will be advised about the substance of the disclosure prior to any actions being taken, Mounties Group will also take reasonable steps to protect the confidentiality of persons implicated in a whistleblower disclosure.

The method for documenting and reporting the findings of an investigation will depend on the nature of the disclosure, there may be circumstances where it may not be appropriate to provide details of the outcome to the discloser, where it is appropriate the discloser will receive a summary document of the outcome of the investigation. The findings from an



Locked Bag 1
Wetherill Park BC NSW 2164
101 Meadows Road
Mt Pritchard NSW 2170
Australia

Telephone

(02) 9822 3555

Facsimile

(02) 9610 6832

Email

info@mountiesgroup.com.au

www.mountiesgroup.com.au

mounties

**mounties
bowling club**

harbord diggers

**manly
bowling club**

club italia

mekong

triglav

Mt Pritchard & District Community Club Ltd
ACN 000 458 622 ABN 98 000 458 622

investigation will be securely documented to preserve confidentiality and reported to the CEO and Board of Mounties Group. Mounties Group Board and Senior Management will be notified of disclosures and such notifications and reporting to the Board of Mounties Group will be done in a manner consistent with the confidentiality protections set out in (a) – (i) above. Although confidentiality is maintained, in some circumstances the source of the reported issue may be obvious to a person who is the subject of a report. Mounties Group will also take reasonable precautions to store any records relating to a report of improper conduct securely and to permit access by authorised persons only.

Unauthorised disclosure of any information relating to a report will be regarded seriously and may result in disciplinary action, which may include dismissal. A discloser may lodge a complaint with Mounties Group about a breach of confidentiality by contacting Mounties Group, a discloser may also lodge a complaint with a regulator, such as ASIC, APRA or the ATO, for investigation.

Disclosures to Stopleveline will be handled by a trained interviewer, anonymity and confidentiality will be maintained and all reports prepared by Stopleveline will be forwarded to the Disclosure Coordinator.

Where a person makes a disclosure in good faith and on reasonable grounds, Mounties Group will act in the person's best interest to protect any person from any reprisal, victimisation, adverse reaction or intimidation and ensure they will not be disadvantaged in their employment with Mounties Group. However, making a report will not necessarily shield the person making the disclosure from the consequences flowing from their involvement in the improper conduct itself. A person's liability for their own conduct is not affected by their reporting of that conduct under this policy. In some circumstances, an admission may be a mitigating factor when considering disciplinary or other action.

Support and Protections

Protection from detriment

It is illegal for someone to cause or threaten detriment to you because they believe or suspect that you have made, may have made, or could make a whistleblower disclosure. It is also illegal for a person to identify a discloser, or disclosure information that is likely to lead to the identification of the discloser.

All reasonable steps will be taken to ensure that the whistleblower will not be subject to any form of retaliation or victimisation behaviour, which includes actions such as:

- dismissal, suspension, demotion or being overlooked for future career opportunities;
- harassment or intimidation;
- discrimination or bias;
- harm or injury (including psychological harm);
- damage to a person's property.

The CEO will be responsible for providing certain protections and supporting persons reporting under this policy. These include:

- maintaining regular contact with the whistleblower;
- maintaining the confidentiality of the whistleblower; and
- redacting the whistleblower's name, personal information and information which could lead to the identification of the whistleblower, in any written material which describes the disclosure;



Locked Bag 1
Wetherill Park BC NSW 2164
101 Meadows Road
Mt Pritchard NSW 2170
Australia

Telephone
(02) 9822 3555
Facsimile
(02) 9610 6832
Email
info@mountiesgroup.com.au

www.mountiesgroup.com.au

mounties

**mounties
bowling club**

harbord diggers

**manly
bowling club**

club italia

mekong

triglav

Mt Pritchard & District Community Club Ltd
ACN 000 458 622 ABN 98 000 458 622

- the whistleblower will always be referred to in a gender-neutral context;
- where possible, contact the whistleblower to ascertain certain information which could cause another person to identify the whistleblower (for example, there may be unique characteristics about how and when the whistleblower discovered information about the wrongdoing, and if these characteristics are disclosed, it may cause another person to identify the whistleblower);
- documents or information relating to the investigation will not be sent to a printer or email address that can be accessed by other staff;
- reviewing any complaints of retaliation or victimisation against the whistleblower and escalating matters as appropriate.

Making a report will not protect any person making the disclosure if they are also involved in or connected to the improper conduct itself.

Compensation and other remedies

A whistleblower is entitled to seek compensation and other relief through the courts if:

- they suffer detriment due to making the disclosure; and Mounties Group failed to prevent the detriment.

Protection from legal liability

A whistleblower is protected from the following in relation to their disclosure:

- civil liability, such as legal action being commenced against the whistleblower for breach of confidentiality or any other obligations in their employment contract or elsewhere;
- criminal liability, such as for unlawfully releasing information or other use of the disclosure against the disclosure in a prosecution (other than for making a false disclosure); and
- administrative liability, e.g. being sanctioned or disciplined due to making a whistleblower disclosure.

These protections do not grant immunity for any misconduct a discloser has engaged in that is revealed in their disclosure.

These protections apply not only to internal disclosures, but to disclosures to legal practitioners, regulatory and other external bodies and public interest and emergency disclosures that are made in accordance with the Corporations Act.

Reporting Tax wrongdoing

Disclosures about tax wrongdoing are treated differently to other disclosures. Tax disclosures refer to wrongdoing in relation to federal tax matters, such as tax avoidance or other breaches of tax legislation. Federal tax includes income tax (also known as corporate tax), capital gains tax (CGT), Goods and Services Tax (GST) and Fringe Benefits Tax (FBT).

Taxes that are regulated by state legislation must be treated as a non-tax matter for the purposes of whistleblower rules. Taxes regulated by state legislation include gaming tax, payroll tax and land tax.

Examples

1. If an employee wishes to make a whistleblower disclosure because they suspect that a club is deliberately underpaying payroll tax or gaming tax, the employee



Locked Bag 1
Wetherill Park BC NSW 2164
101 Meadows Road
Mt Pritchard NSW 2170
Australia

Telephone
(02) 9822 3555
Facsimile
(02) 9610 6832
Email
info@mountiesgroup.com.au

www.mountiesgroup.com.au

mounties

**mounties
bowling club**

harbord diggers

**manly
bowling club**

club italia

mekong

triglav

Mt Pritchard & District Community Club Ltd
ACN 000 458 622 ABN 98 000 458 622

should make the disclosure to a *prescribed recipient for non-tax matters* (described below) and not a *prescribed recipient for tax matters*.

2. Alternatively, if an employee wishes to make a whistleblower disclosure because they suspect that a club is deliberately underpaying corporate tax, the employee should make the disclosure to a *prescribed recipient for tax matters*.

Federal tax-related disclosures must satisfy an additional ground to be a *disclosable matter* (in addition to the description above), being that the person considers that the information may assist the recipient to perform their duties in relation to taxation.



Eligible Recipients for non-tax matters

The following bodies and people are prescribed eligible recipients. Therefore, disclosing information about wrongdoing will qualify the person for whistleblower protections, as long as the other two criteria are met (the person is an eligible whistleblower and the information is a disclosable matter):

- Stoplevel;
- an employee's direct manager or supervisor;
- a director or senior manager of Mouties Group;
- Mouties Group's internal or external auditor (or a member of the external audit team) and actuary;
- the Australian Securities and Investments Commission (ASIC); or the Australian Prudential Regulation Authority (APRA).

A disclosure can also be made to a journalist or parliamentarian under certain circumstances where;

There is a public interest discloser and:

- At least 90 days have passed since the discloser made the disclosure to ASIC, APRA or another Commonwealth body prescribed by regulation;
- the discloser does not have reasonable grounds to believe that action is being, or has been taken, in relation to their disclosure;
- the discloser has reasonable grounds to believe that making a further disclosure of the information is in the public interest; and
- before making the public interest disclosure, the discloser has given written notice to Mouties Group that:
 - (i) includes sufficient information to identify the previous disclosure; and
 - (ii) states that the discloser intends to make a public interest disclosure.

There is an emergence discloser and:

- the disclosure has previously made a disclosure of the information to ASIC, APRA or another Commonwealth body prescribed by regulation;
- the disclosure 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;
- before making the emergency disclosure, the discloser has given written notice to Mouties Group that:
 - (i) includes sufficient information to identify the previous disclosure; and
 - (ii) states that the discloser intends to make an emergency disclosure; and
- the extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the journalist or parliamentarian of the substantial and imminent danger.

Locked Bag 1
Wetherill Park BC NSW 2164
101 Meadows Road
Mt Pritchard NSW 2170
Australia

Telephone

(02) 9822 3555

Facsimile

(02) 9610 6832

Email

info@moutiesgroup.com.au

www.moutiesgroup.com.au

mouties

**mouties
bowling club**

harbord diggers

**manly
bowling club**

club italia

mekong

triglav

Mt Pritchard & District Community Club Ltd
ACN 000 458 622 ABN 98 000 458 622

Mounties Group recommends you contact Stopline before making any public interest disclosure or emergency disclosure.

Eligible Recipients for tax matters

The following bodies and people are prescribed eligible recipients for disclosures related to federal taxes:

- Stopline;
- Commissioner of Taxation;
- an employee's direct manager or supervisor;
- Mounties Group's internal or external auditor (or a member of the external audit team);
- a registered tax agent or BAS agent who provides services to Mounties Group;
- a director or senior manager of Mounties Group or;

any employee or director with tax-related responsibilities.

Vexatious / Malicious Disclosures

Where it is shown that a person purporting to be a whistleblower has knowingly made a false report of improper conduct, and it is evident that the reporter knows, or should have known the report has no substance, then that conduct itself will be considered a serious matter and that person may be subject to disciplinary action which may include dismissal.

Investigation

All reports of alleged or suspected improper conduct made under this policy will be properly assessed and if appropriate, will be independently investigated in a timely manner with the objective of locating evidence that either substantiates or refutes the claims made by the whistleblower. Accordingly, during the investigation additional information may be requested from a whistleblower in order to make an assessment. The whistleblower will also be kept informed of the progress of the Investigation and the outcome of the investigation. The timeframe for handling and investigating disclosures is one (1) month to two (2) months which may vary or need to be extended depending on the nature of the disclosure.

The People & Culture Leader will be responsible for ensuring the proper conduct of the investigation, which may include appropriate instruction and oversight of a third party appointed to conduct an investigation. The investigation will not be conducted by a person who may be the subject of the investigation or has inappropriate links or connections (actual or perceived) to the person(s) or practice(s) under investigation.

The People & Culture Leader will keep the whistleblower informed of the outcomes of the investigation to his/her report subject to the considerations of privacy of those against whom the allegations have been made.

Throughout the assessment and investigation process Mounties Group will treat fairly the person who is the subject of a report.

If, following an investigation, the allegations are found not to be substantiated, then any documents relating to the investigation will be handled confidentiality, subject to disclosures to the appropriate members of management, as appropriate.

This policy will be made available on Mounties Group website at www.mountiesgroup.com.au and will be reviewed every two (2) years by Mounties Group Board to ensure it remains consistent with all relevant legislative requirements. It was last reviewed on 24 December 2019 . Mounties Group will ensure this policy is widely disseminated through ongoing education and training of employees.



Locked Bag 1
Wetherill Park BC NSW 2164
101 Meadows Road
Mt Pritchard NSW 2170
Australia

Telephone
(02) 9822 3555
Facsimile
(02) 9610 6832
Email
info@mountiesgroup.com.au

www.mountiesgroup.com.au

mounties

**mounties
bowling club**

harbord diggers

**manly
bowling club**

club italia

mekong

triglav

Mt Pritchard & District Community Club Ltd
ACN 000 458 622 ABN 98 000 458 622



Review of this policy

Mounties Group reserves the right to vary, replace or terminate this policy from time to time.



Date: 11 February 2020

Chairperson

Table	
MGM 675 (13/12/2016)	1449/2016*: ARC Matters - Whistleblower Policy / policy adopted
MGM 713 (11/2/2020)	Rewrite incorporating amendments to coincide with the commencement of Whistleblower Disclosure Management Services (Stopline Pty Ltd)

Locked Bag 1
Wetherill Park BC NSW 2164
101 Meadows Road
Mt Pritchard NSW 2170
Australia

Telephone

(02) 9822 3555

Facsimile

(02) 9610 6832

Email

info@mountiesgroup.com.au

www.mountiesgroup.com.au

mounties

***mounties
bowling club***

harbord diggers

***manly
bowling club***

club italia

mekong

triglav

Mt Pritchard & District Community Club Ltd
ACN 000 458 622 ABN 98 000 458 622