

Whistleblower Policy

1. Purpose

This policy ensures that all members, volunteers, employees, and stakeholders of SYDNEY HERITAGE FLEET can report misconduct or unethical behavior without fear of reprisal.

It complies with Australian legislation and promotes transparency, accountability, and integrity.

2. Scope

This policy applies to:

- Members and volunteers of the organization.
- Current and former employees.
- Contractors, suppliers, and their employees providing services to the organization.
- Family members and dependents of the individuals listed above.

3. Protected Disclosures

Disclosures covered under this policy include, but are not limited to:

- Illegal activity (e.g., fraud, corruption, theft).
- Breaches of the **Corporations Act 2001**, **ASIC Act 2001**, **Insurance Act 1973**, **Life Insurance Act 1995**, or related instruments.
- Mismanagement of organizational funds.
- Harassment, discrimination, or abuse.
- Environmental damage.
- Breaches of internal policies, codes of conduct, or governance frameworks.

4. Protection for Whistleblowers

4.1 Confidentiality

The identity of the whistleblower will remain confidential unless:

- Written consent is provided by the whistleblower.
- Disclosure is required by law (e.g., to ASIC, APRA, or a law enforcement body).

4.2 Protection Against Detriment

The organization prohibits retaliation, including dismissal, harassment, or discrimination against whistleblowers. Any individual found to engage in retaliatory conduct will face disciplinary action, including potential termination or legal action.

4.3 Immunity

Whistleblowers acting in good faith will not be subject to legal liability, contractual repercussions, or disciplinary action for making a disclosure.

5. Reporting Misconduct

5.1 Reporting Channels

Reports can be made via:

1. Internal Reporting

- a. Whistleblower Protection Officer (WPO):
 - i. Tom Harris-Brassil, SHF Director and Manager of Board Business
Email: Tom.HarrisBrassil@shf.org.au
Phone: 0401 834 924

2. External Reporting

- a. ASIC or APRA for statutory breaches.
- b. Local law enforcement for criminal activity.

3. Anonymous Reporting

By post to:

Attn: Whistleblower Protection Officer [CONFIDENTIAL]

Sydney Heritage Fleet
Wharf 7, 58 Pirrama Road
Pyrmont NSW 2009

5.2 Investigative Process

1. **Acknowledgment:** Reports will be acknowledged within five business days.
2. **Assessment:** The WPO will assess whether the report qualifies as a protected disclosure.
3. **Investigation:** Investigations will be conducted impartially by qualified personnel or external experts if necessary.
4. **Outcome:** Findings will be reported to relevant stakeholders, and corrective actions will be implemented where appropriate.

6. Whistleblower Policy Awareness

Dissemination and awareness of this policy will be promoted via the organisation's website and internal communications.

7. Governance and Oversight

The Board of Directors will oversee the implementation and effectiveness of this policy.

The policy will be reviewed regularly to ensure compliance with evolving legislation and best practices.

8. Breach of Policy

Failure to comply with this policy, including retaliatory conduct or unauthorized disclosure of a whistleblower's identity, will result in disciplinary action and may include legal consequences.

9. Relevant Legislation and References

This policy aligns with the following laws and instruments:

- **Corporations Act 2001**
- **ASIC Act 2001**
- **Insurance Act 1973**
- **Life Insurance Act 1995**
- **Australian Standard AS 8004-2003: Whistleblower Protection Programs for Entities**
- Any related regulations and codes of practice.

10. Policy Approval and Review

- **Effective Date:** 15 December 2024
- **Review Date:** 30 May 2026
- **Approved by:** Board