

Factor Therapeutics Limited Whistleblower Protection Policy

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Whistleblower Protection Policy

1 Introduction

Factor Therapeutics Limited ACN 101 955 088 (**the Company**) is committed to conducting business with honesty and integrity. As part of this commitment, the Company will honour its obligation to protect any genuine whistleblowers who come forward from retaliation.

This whistleblower protection policy (**Policy**) is an important tool for helping the Company identify wrongdoing that may otherwise not be uncovered unless there is a safe and secure means for disclosing misconduct. The Policy applies to the operations of the Company and its related bodies corporate in Australia, and the Australian employees, officers, contractors and associates of the Company.

The Policy is designed to:

- (a) encourage people to speak-up if they become aware of potential wrongdoing;
- (b) ensure individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported;
- (c) ensure disclosures of wrongdoing are dealt with appropriately and on a timely basis;
- (d) provide transparency around the Company's framework for receiving, handling and investigating disclosures;
- (e) explain the protections available to eligible whistleblowers;
- (f) support the Company's values and code of conduct;
- (g) support the Company's long-term sustainability and reputation by creating a healthier and safer work environment;
- (h) align with the ASX Corporate Governance Principles and Recommendations;
- (i) provide information regarding the rights and obligations of employees, contractors, and other personnel of the Company under the *Corporations Act 2001* (Cth) as amended by the *Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019* (Cth) (**the Australian Laws**).

All employees, officers, contractors, and associates of the Company have a responsibility to help detect, prevent and report instances wrongdoing. The Company encourages employees and non-employees to speak-up and raise concerns about wrongdoing without fear of retaliatory action.

If there is any inconsistency between the terms of this Policy, and any other Company policy, this Policy will prevail to the extent of the inconsistency.

2 Qualifying for whistleblower protection

Under the Australian Laws, whistleblowers are entitled to certain protections if they satisfy all of the following criteria:

- (a) the person must be an **Eligible Whistleblower** (see **Section 4**);
- (b) the person must make a disclosure to an **Eligible Recipient** (see **Section 5**); and
- (c) that disclosure must be a **Protected Disclosure**, that is, it must be a disclosure of information made where there are reasonable grounds to suspect that such information concerns misconduct or an improper state of affairs about the Company or another member of the Company (see **Section 6**).

Information about the protections that are available to whistleblowers who qualify for protection is in **Sections 7 and 8** of this Policy.

3 Quick guide to this policy

A quick guide to this Policy is included at **Annexure A**. It is designed to assist potential whistleblowers in understanding whether they are eligible for the protections mentioned in this Policy, and, if they are eligible, what those protections entail.

4 Eligible Whistleblowers

Although whistleblower protections will only be available to Eligible Whistleblowers, the Company encourages any person with information about potential misconduct to speak-up about such misconduct. Under the Australian Laws, the following individuals may be an **Eligible Whistleblower** in relation to the Company:

- (a) all officers (within the meaning of the Australian Laws) of the Company;
- (b) all employees of the Company (including, but not limited to, current and former employees who are permanent, part-time, fixed-term or temporary, interns, secondees, managers, and directors);
- (c) an employee (whether paid or unpaid) of any organisation that supplies goods or services to the Company (including, but not limited to, current and former contractors, consultants, service providers and business partners);
- (d) any individual who supplies goods or services to the Company; and
- (e) any associate of the Company (as defined under the Australian Laws).

A relative or dependent of any of the individuals mentioned above may also be an Eligible Whistleblower. In future, the Australian Laws (and regulations) may also prescribe further types of individuals who qualify as Eligible Whistleblowers.

5 How can Eligible Whistleblowers make a Protected Disclosure

5.1 Who can disclosures be made to?

An Eligible Whistleblower is entitled to make a protected disclosure to any of the following **Eligible Recipients**:

- (a) an officer or senior manager of the Company or related body corporate;
- (b) an auditor or member of an audit team conducting an audit of Company or related body corporate;
- (c) an actuary of the Company or related body corporate;
- (d) a person authorised by the Company to receive protected disclosures; and

In addition, Eligible Whistleblowers can also make protected disclosures to ASIC, APRA, an Australian legal practitioner, or to other Australian regulators (**Regulatory Bodies and Other External Parties**). The Company recommends that Eligible Whistleblowers review the whistleblowing information provided by Regulatory Bodies and Other External Parties including, but not limited to, ASIC Information Sheet 239 and APRA's Public Interest Disclosure Policy.

Disclosures made to legal practitioners for the purpose of obtaining legal advice or legal representation in relation to the operation of whistleblower provisions under the Australian Laws are protected (even in the event that the Australian legal practitioner concludes that a disclosure does not relate to a 'disclosable matter').

5.2 How to make a Protected Disclosure?

Eligible Whistleblowers may make a disclosure to any of the people mentioned above at any time. However, Eligible Recipients should determine whether the location and time are appropriate for the disclosure comfortably and for ensuring the discloser is protected. If an Eligible Whistleblower wishes to make a disclosure (or talk to someone about whether or not they should make a disclosure), the Company encourages them to discuss the matter privately with one of the following recipients who are all authorised by the Company to receive protected disclosures under the Australian Laws relating to the Company or any related body corporate:

Authorised Recipient	Contact Details
Company Secretary	<i>Name: Melanie Farris</i> <i>Phone: 07 3334 3900</i> <i>Email: m.farris@factor-therapeutics.com</i>

5.3 Disclosure of identity

In making a Protected Disclosure, Eligible Whistleblowers are not required to disclose their identity. This includes in any Protected Disclosure that is made within the Company. Eligible Whistleblowers may adopt a pseudonym for the purpose of their disclosure. This may be appropriate in circumstances where the discloser's identity is known to their supervisor but the discloser prefers not to disclose their identity.

That said, to assist in the investigation of the matter, the Company strongly encourages all Eligible Whistleblowers to disclose as much information as possible, including their identity. The more information provided, the better the Company will be armed to investigate and act on a disclosure.

6 Protected Disclosures

Employees at the Company should feel free to talk with the Company Secretary at any time about day to day work-related matters. However, only certain types of disclosures will qualify as a Protected Disclosure and attract the protections provided for in this Policy and under the Australian Laws.

To qualify, a disclosure must be a Protected Disclosure.

A **Protected Disclosure** is a disclosure of information that is made where the Eligible Whistleblower has reasonable grounds to suspect that such information concerns misconduct or an improper state of affairs or circumstances in relation to the Company or a related body corporate of the Company.

6.1 Examples of disclosures which may qualify for protection

A Protected Disclosure can include the disclosure of information made where the Eligible Whistleblower has reasonable grounds to suspect that such information indicates that the Company, or a related entity, or any officer or employee of the Company, has engaged in conduct which:

- (a) represents a danger to the Australian public or the Australian financial system or which is prescribed by regulations for the purposes of the Australian Laws;
- (b) constitutes an offence against, or a contravention of any of the following laws:
 - (i) *Corporations Act 2001* (Cth);
 - (ii) *Australian Securities and Investments Commission Act 2001* (Cth);
 - (iii) *Banking Act 1959* (Cth);
 - (iv) *Financial Sector (Collection of Data) Act 2001* (Cth);
 - (v) *Insurance Act 1973* (Cth);
 - (vi) *Life Insurance Act 1995* (Cth);
 - (vii) *National Consumer Credit Protection Act 2009* (Cth);
 - (viii) *Superannuation Industry (Supervision) Act 1993* (Cth); or
- (c) any instrument or regulation made under any of the above laws; or
- (d) constitutes an offence against any law of the Commonwealth of Australia which is punishable by imprisonment for a period of 12 months or more.

6.2 Further examples of disclosures which may qualify for protection

A Protected Disclosure can include the disclosure of information relating to the following types of wrongdoing:

- (a) illegal conduct, such as theft, dealing in, or use of illicit drugs, violence or threatened violence, and criminal damage against property;
- (b) fraud, money laundering and misappropriation of funds;
- (c) offering or accepting a bribe;
- (d) financial irregularities;
- (e) failure to comply with, or breach of, legal or regulatory requirements; and
- (f) 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.

Under the Australian Laws, Protected Disclosures can relate to wrongdoing that may not involve a contravention of a particular law. For example, the disclosure of information that indicates a significant risk to public safety or the stability of, or confidence in, the financial system could be a Protected Disclosure even if it does not involve a breach of a particular law.

6.3 External Disclosures

In certain situations, an Eligible Whistleblower may make a disclosure to Australian journalists or a Member of Parliament (known as an **External Disclosure**). External Disclosures can only be made in circumstances where:

- (a) a Protected Disclosure has already been made to a regulatory body (such as ASIC, APRA or another Commonwealth body prescribed by regulation), but the Eligible Whistleblower has no reasonable grounds to believe that any action is being taken to address the conduct or state of affairs in question;
- (b) at least 90 days have passed since the Protected Disclosure was made;
- (c) the Eligible Whistleblower has reasonable grounds to believe that it would be in the public interest for a further disclosure to be made, or alternatively, that the disclosure concerns a 'substantial and imminent danger' to the health or safety of a person or to the natural environment; and
- (d) before making the External Disclosure, the Eligible Whistleblower first gives the regulatory body written notice, that includes sufficient information to identify the previous disclosure and states the discloser's intention to make an External Disclosure.

In relation to disclosure concerning a 'substantial or imminent danger' to the health or safety of a person or to the natural environment, the extent of the information disclosure

should be no greater than is necessary to inform the journalist or parliamentarian of the substantial and imminent danger.

The consequences of an Eligible Whistleblower making a non-protected External Disclosure can be significant and detrimental for the Company and/or the whistleblower himself or herself. As such, the Company strongly encourages any potential Eligible Whistleblowers to talk to the Company Secretary or their legal advisor about the protections and process applicable under the Australian Laws before making an External Disclosure.

6.4 What type of Information should be disclosed?

If you are considering making a whistleblower disclosure, you should gather as much information as possible (within the bounds of the law) about the misconduct or state of affairs in question. Where possible, you should endeavor to include information about:

- (a) the identity of any director, employee, officer, contractor or other person involved;
- (b) the nature of the allegations;
- (c) the date when such misconduct or state of affairs occurred;
- (d) the involvement of any other director, employee, officer, contractor or other person;
- (e) any witnesses; and
- (f) the location of any evidence (such as documentation or electronic data)

7 How the Company will support and protect Eligible Whistleblowers

7.1 Primary protections

Where a Protected Disclosure qualifies for protection under the Australian Laws, the Company (or the relevant member of the Company) will apply the following protections when responding to or investigating the disclosure:

Right to Confidentiality:

The Australian Laws require that:

- (a) all employees and officers of the Company (and anyone else who indirectly obtains the identity of an Eligible Whistleblower) must take all reasonable steps to maintain the anonymity of an Eligible Whistleblower. It is illegal for a person to identify a Eligible Whistleblower, or disclose information that is likely to lead to the identification of the Eligible Whistleblower outside the exceptions set out in 7.1(c);
- (b) the Company take all steps possible to keep the confidentiality of the whistleblower's identity, including any information that is likely to identify them during the investigation process, unless:
 - (i) the information does not include the discloser's identity;

- (ii) the Company removes information relating to the discloser's identity or other information that is likely to lead to the identification of the discloser;
 - (iii) it is reasonably necessary for investigating the issues raised in the disclosure;
- (c) a person cannot disclose the identity of a discloser of information that is likely to lead to the identification of an Eligible Whistleblower unless the disclosure is made to ASIC, APRA, a member of the Australian Federal Police, a legal practitioner, to a body prescribed by regulations or with the consent of the Eligible Whistleblower.

The Company has implemented the following measures and mechanisms for protecting the confidentiality of a discloser's identity:

- (a) where possible, all personal information or reference to the discloser witnessing an event will be redacted;
- (b) where possible, the discloser will be contacted to help identify certain aspects of their disclosure that could inadvertently identify them;
- (c) disclosures will be handled and investigated by qualified staff;
- (d) all paper and electronic documents relating to disclosures will be stored securely;
- (e) access to all information relating to a disclosure will be limited to those directly involved in managing and investigating the disclosure;
- (f) 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;
- (g) 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
- (h) each person who is involved in handling and investigating a disclosure will be reminded about the confidentiality requirements, including that an unauthorised disclosure of a discloser's identity may be a criminal offence.

Investigation into disclosure:

The Company will investigate the matters raised in the disclosure to determine whether any misconduct has occurred:

- (a) there will be an independent investigation conducted in a timely manner. The length of time required to undertake the investigation will, of course, be dependent upon the nature of the allegations made. The Company will consider the following factors once it is determined that an investigation will take place:
 - (i) the nature and scope of the investigation;

- (ii) the persons within or outside the Company that should lead the investigation;
 - (iii) the nature of any technical, financial or legal advice that may be required to support the investigation; and
 - (iv) the timeframe for the investigation;
- (b) the Company acknowledges that certain limitations to the Company's investigation process may arise (for example, if a disclosure is made anonymously and the discloser has refused to provide or has not provided a means of contacting them);
 - (c) if the Protected Disclosure has been made by someone who has disclosed his or her identity, the Company will, where possible, keep the discloser updated on the progress of the investigation. The extent to which this will be possible will depend upon the circumstances of the disclosure, including any obligations of confidentiality or legal privilege that arise;
 - (d) where the investigations identify serious criminal conduct, the Company will work with the police, regulators, or other authorities (as appropriate) who may pursue their own independent investigations;
 - (e) the Company is committed to ensuring that disclosers will be provided with regular updates, if the discloser can be contacted (including through anonymous channels). The frequency and timeframe of these updates may vary depending on the nature of the disclosure;

If an Eligible Whistleblower who has made a Protected Disclosure has any questions about his or her Protected Disclosure or any investigation of a Protected Disclosure he or she is encouraged to contact the Company Secretary or the person to whom he or she made his or her Protected Disclosure. Employees may also contact the legal team to discuss any matters detailed in this Policy.

7.2 Detrimental Conduct

What is detrimental conduct?

- (a) The Australian Laws require that a person cannot engage in conduct that causes detriment to a discloser (or another person) in relation to a disclosure:
 - (i) if the person believes or suspects that the discloser (or another person) made, may have made, proposes to make or could make a disclosure that qualifies for protection; and
 - (ii) the belief or suspicion is the reason, or part of the reason for the conduct.
- (b) A person also cannot make a threat to cause detriment to a discloser (or another person) in relation to a disclosure. A threat may be express or implied, or conditional or unconditional. A discloser (or another person) who has been threatened in relation to a disclosure does not have to actually fear that the threat will be carried out.

What to do if you suffer from detrimental conduct?

- (a) The Company is committed to ensuring that whistleblowers are not subjected to detrimental conduct. The Company takes this very seriously. The meaning of 'detrimental conduct' will vary depending on the particular circumstances and the position of the whistleblower in relation to the Company. However, it may include conduct which causes, or threatens to cause:
 - (i) the dismissal of an employee due to his or her whistleblower disclosure (or because the employee intends to or might make such a disclosure);
 - (ii) the injury of an employee in his or her employment;
 - (iii) the alteration of an employee's position or duties to his or her disadvantage;
 - (iv) discrimination between an employee and other employees at the Company;
 - (v) harassment or intimidation;
 - (vi) harm or injury, including psychological harm;
 - (vii) damage to a person's property;
 - (viii) harm to a person's reputation; and/or
 - (ix) damage to a person's business or financial position.
- (b) All employees and non-employees of the Company should be aware that certain actions are not detrimental conduct. This includes, but is not limited to:
 - (i) administrative action that is reasonable for the purpose of protecting a discloser from detriment (for example, moving a discloser who has made a disclosure about their immediate work area to another office to prevent them from detriment); and
 - (ii) managing a discloser's unsatisfactory work performance, if the action is in line with the Company's performance management framework.

How will the Company protect you from detrimental conduct?

The Company has implemented measures and mechanisms for protecting disclosers from detrimental acts or omissions including:

- (a) processes for ensuring that management are aware of their responsibilities to maintain the confidentiality of a disclosure, address the risks of isolation or harassment, manage conflicts and ensure fairness when managing the performance of, or taking other management action relating to a discloser;
- (b) processes for assessing the risk of detriment against a discloser and other persons;
- (c) strategies to help a discloser minimise and manage stress, time or performance impacts, or other challenges resulting from the disclosure or its investigation;

- (d) interventions for protecting a discloser if detriment has already occurred.

You should tell an Eligible Recipient if you are concerned about being victimized or suffering from detrimental conduct because you have made a Protected Disclosure and considering seeking independent legal advice. Where applicable, you should consider contacting regulatory bodies such as ASIC, APRA or the ATO if they believe they have suffered detriment.

7.3 Other Protections

The Company may offer other protections (not mentioned above) to Eligible Whistleblowers or take further steps to prevent the occurrence of any detrimental conduct. Any further steps or protections will be determined by the Company as appropriate, depending upon the nature of the potential misconduct and the people involved. Such protections may include, at the Company's discretion:

- (a) monitoring or managing the behavior of other employees;
- (b) relocating employees (which may include the people alleged to have been involved in the potential misconduct) to a different division, group or office;
- (c) offering a leave of absence or flexible workplace arrangements to Eligible Whistleblowers while a matter is under investigation;
- (d) taking steps to rectify any detriment that may have been suffered; and/or
- (e) taking disciplinary action against any other employees or persons involved in victimizing or causing detriment to an Eligible Whistleblower.

8 What happens after an investigation?

The results of any investigation will be recorded in writing in a formal internal report that will be confidential and is the property of the Company. The outcome of any investigation will be reported to the Board of the Company.

The method for documenting and reporting the findings of any investigation will depend on the nature of the disclosure.

Disclosers will generally be informed of the investigation outcome. In some circumstances it may not be appropriate to provide disclosers with this information, in which case the information will not be shared.

The formal report recording the results of an investigation will not be provided to a discloser or any other person subject to an investigation.

9 Information on further protections available under the Australian Laws

In addition to the protections provided by the Company, as detailed above in this Policy, there are further protections available under the Australian Laws.

Orders for compensation may be available through the Courts, and can be made against any person who has caused (or threatened to cause) detriment to another person who has,

or is believed to have, made a Protected Disclosure. The Company encourages disclosers to seek independent legal advice in relation to compensation and other remedies. Generally, a discloser can seek compensation and other remedies through the courts if:

- (a) they suffer loss, damage or injury because of a disclosure; and
- (b) the Company failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

Eligible Whistleblowers who qualify for protection under the Australian Laws cannot be subject to any civil, criminal, or administrative liability (including disciplinary action) for making the Protected Disclosure. Importantly, however, this does not prevent a person from being the subject of criminal, civil, or administrative liability for conduct that is revealed by the disclosure.

Information revealing, or likely to lead to, the identification of an Eligible Whistleblower who qualifies for protection under the Australian Laws is not required to be disclosed to a Court or Tribunal, except where necessary under the Australian Laws or if the Court considers that it is in the interests of justice to do so.

These further protections are not administered by the Company, or any member of the Company. You should seek independent legal advice if you have any queries about the further protections available to Eligible Whistleblowers under the Australian Laws.

10 Ensuring fair treatment of employees mentioned in Protected Disclosures

Where a Protected Disclosure raises potential misconduct involving an employee, or group of employees, of the Company, the Company will consider whether any disciplinary action is appropriate in the circumstances if that conduct is established.

If the Company is considering taking disciplinary action against such employees, Australian law may require that the Company provide procedural fairness to such employees before it determines whether or not to take disciplinary action. In that regard:

- (a) procedural fairness ordinarily involves the Company providing details of the alleged misconduct of such employees and giving such employees an opportunity to provide an explanation of the alleged misconduct;
- (b) procedural fairness obligations can be difficult to comply with in circumstances where the Company is limited from disclosing the full nature of a Protected Disclosure by the confidentiality obligations that it owes Eligible Whistleblowers;
- (c) in complying with such procedural fairness obligations the Company will not breach an Eligible Whistleblowers' confidentiality. However, the Company will be required to provide as much information as is possible to employees to give them a fair opportunity to respond to allegations;
- (d) the objective of any investigation is to determine whether there is enough evidence to substantiate or refute the matters reported; and
- (e) the Company may contact Eligible Whistleblowers to request their consent to provide additional confidential information to employees accused of misconduct.

In such circumstances the group encourages Eligible Whistleblowers to provide their consent because, if consent is not forthcoming, the group may be limited in the allegations which it can fairly put to employees who are said to have been involved in misconduct. This could have the effect of limiting any disciplinary actions which may be open to the group against such employees for established misconduct.

11 Availability of this Policy

This Policy is made available to all employees of the Company and to external parties such as contractors, suppliers and associated parties (who may meet the definition of an Eligible Whistleblower as set out above). The Policy will be distributed to all employees and contractors on appointment and will form part of employee induction training.

Additionally, the Company will provide training to its Australian employees about the terms of this Policy and the types of misconduct which may qualify as a Protected Disclosure under the Australian Laws.

12 Additional Information

The Australian Laws only provide protections to Eligible Whistleblowers where they make a Protected Disclosure in the manner contemplated by Australian Laws (as set out above).

If you wish to make complaints or disclosures about other matters, such as personal work-related grievances, the Company may elect not to treat such complaints or disclosures in accordance with the terms of this Policy. This is consistent with the Australian Laws, which provide that disclosures of information about 'personal work-related grievances' do not qualify for whistleblower protection as a Protected Disclosure. In this regard:

- (a) a disclosure will be about a personal work-related grievance if it purely relates to the discloser's employment, or former employment, and has, or tends to have, implications for the discloser personally, but do not:
 - (i) have any other significant implications for the Company (or another entity);
or
 - (ii) relate to the disclosure of information that is not a Protected Disclosure under Section 6 of this Policy;
- (b) such as:
 - (i) an interpersonal conflict between the discloser and another employee;
 - (ii) a decision relating to the engagement, transfer or promotion of the discloser;
 - (iii) a decision relating to the terms or conditions of the discloser's engagement; or
 - (iv) a decision to suspend, terminate, or discipline the discloser;
- (c) a disclosure will not be about a personal work-related grievance if it has serious implications for the Company or another member of the Company;

- (d) a personal work-related grievance may still qualify for protection if:
 - (i) it includes information about misconduct, or information about misconduct includes or is accompanied by a personal work-related grievance (mixed report);
 - (ii) the Company 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;
 - (iii) the discloser suffers from or is threatened with detriment for making a disclosure; or
 - (iv) the discloser seeks legal advice or legal representation about the operation of the whistleblower protections under the Australian Laws.

Any complaints about personal work-related grievances will instead be dealt with in accordance with the Company's other policies and procedures, as may be in place from time-to-time. The Company encourages employees and non-employees to seek independent legal advice about their rights and protections under employment and contract law, and to resolve personal work-related grievances.

13 Breach

A breach of the protections provided by the Company in connection with this Policy will be treated as a serious disciplinary matter.

In the event of a breach or suspected breach of this Policy by the Company, or its representatives (including, but not limited to, a breach or suspected breach of the confidentiality protections), the Eligible Whistleblower should immediately lodge a complaint with the Company Secretary.

It is expected that disclosers under this Policy will have reasonable grounds to suspect the information being disclosed is true and a discloser will not be penalised if the information turns out to be incorrect. However, false reports can have a significant impact on the reputation of the Company and its employees. Any deliberately false reporting under this Policy, or otherwise, will be treated as a serious disciplinary matter.

14 Administration

If you have any questions about this Policy, please feel free to contact the Company Secretary.