



TRAVIS
P A R T N E R S

Whistleblower Protection Policy

Alfabs Australia Limited ACN 674 455 442 (**Company**)

Whistleblower Protection Policy

1	About this Policy	3
2	Eligibility for whistleblower protection	3
3	Whistleblowing disclosures	3
4	Investigations of information disclosed under this Policy	5
5	Confidentiality	5
6	Victimisation	6
7	Board reporting	6
8	Consequences for non-compliance	6
9	Training	7
10	Review	7

Whistleblower Protection Policy

1 About this Policy

The Company is committed to the highest standards of conduct and integrity in all its business activities and to the protection of individuals who disclose information concerning misconduct or an improper situation or circumstance concerning the Company.

This Policy outlines how the Company will deal with internal disclosures of information made in accordance with the *Corporations Act 2001* (Cth) (**Corporations Act**) and other relevant laws and, more particularly:

- (a) who is entitled to protection as a whistleblower under this Policy;
- (b) systems for reporting and investigating 'whistleblowing disclosures';
- (c) how whistleblowing disclosures will be handled by the Company; and
- (d) the protections whistleblowers are entitled to.

2 Eligibility for whistleblower protection

You are eligible to make a whistleblowing disclosure to which the Corporations Act applies if you are, or have been:

- (a) an officer or employee of the Company;
- (b) a contractor or supplier of goods or services to the Company (including on an unpaid basis), or an employee of such a supplier;
- (c) a director or secretary of a related body corporate of the Company; or
- (d) a relative or dependant of any of the above people.

3 Whistleblowing disclosures

3.1 Disclosure

A whistleblowing disclosure can be made by a whistleblower who has reasonable grounds to suspect that the information concerns misconduct or an improper state of affairs or circumstances in relation to the Company, including by an officer or employee of the Company, which extends beyond a solely personal work-related grievance.

Examples of disclosable matters may include misconduct or an improper state of affairs or circumstances in relation to the Company which:

- (a) constitutes an offence under any of the prescribed Acts;
- (b) constitutes an offence against any other Commonwealth law punishable by 12 months' imprisonment;

-
- (c) represents a danger to the public or market; or
 - (d) is otherwise prescribed by regulation.

3.2 Personal work-related grievances

A personal work-related grievance is not a whistleblowing disclosure unless it has significant implications for the Company that do not relate to you and concern conduct (or alleged conduct) referred to in 3.1 above or concerns victimisation or threatened victimisation as detailed in section 6 below.

3.3 Internal disclosures

We encourage you to make your whistleblowing disclosure in writing to:

- (a) the Company's Whistleblower Protection Officer;
- (b) an officer or senior manager at the Company; or
- (c) the Company's auditor.

The Whistleblower Protection Officers are Matthew Torrance (CEO) and Mark Harrison (CFO) and are contactable via email at matthew@alfabs.com.au and mark@alfabs.com.au

All the persons listed in this section must attend compulsory training organised by the Company on responding appropriately to disclosures made by whistleblowers or potential whistleblowers.

A whistleblowing disclosure should not be made to any of the abovementioned persons who has been, or is suspected to have been, involved in the conduct or allegations which you are reporting.

3.4 External disclosures

If you do not want to contact the Company, you can make a whistleblowing disclosure by contacting the Company's external auditor as set out below:

Auditor	Pitcher Partners NH Partnership
Address	Level 5/12 Stewart Ave, Newcastle West NSW 2302
Telephone number	(02) 4923 4000

Public interest and emergency disclosures (for example to a member of parliament or journalist) will only be protected if made in specific circumstances set out in the legislation. For more information on public interest and emergency disclosures please click [here](#).

A whistleblower may disclose the information to a legal practitioner for the purpose of obtaining legal advice/representation in relation to the operation of the legislation.

4 Investigations of information disclosed under this Policy

4.1 Assessment of the disclosure

When dealing with a whistleblowing disclosure, the Company must follow the procedure set out below, except where, in the opinion of the Whistleblower Protection Officer, it would be inappropriate or unreasonable in the circumstances to do so.

The CEO will conduct a preliminary assessment to determine whether the disclosure warrants further investigation. If you have disclosed your identity when making the disclosure, the CEO may contact you for further information. In circumstance where the disclosure concerns the CEO, the Chair of the Audit and Risk Committee will carry out the assessment.

4.2 Investigation

An investigation will only take place if there is objective evidence to support the allegations or a reasonable suspicion that such evidence may be obtained through further investigation.

The Whistleblower Protection Officer appoint an investigator with no personal interest in the matter to conduct an investigation into the matters disclosed. The investigator must conduct the investigation in an objective and fair manner, ensuring to provide any employee who has been adversely mentioned in information provided by a whistleblower an opportunity to respond to the allegations made in respect of them prior to any adverse findings being made.

The outcome of the investigation must be reported to the Board, and may be reported to the whistleblower and any persons affected as the Whistleblower Protection Officer considers appropriate.

5 Confidentiality

The identity of a whistleblower (or information that is likely to lead to their identity becoming known) must be kept confidential unless the whistleblower has expressly consented to the disclosure. All persons responsible for or involved in an investigation must take all reasonable steps to reduce the risk that a whistleblower will be identified.

The only circumstances which may lead to the identity of a whistleblower (or information that is likely to lead to their identity becoming known) being disclosed without consent if the disclosure is made to:

- (a) a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of the Statutory Whistle-blower Regimes;
- (b) the Australian Federal Police;
- (c) the Australian Securities and Investments Commission;
- (d) the Australian Prudential Regulatory Authority; or

-
- (e) the Commissioner of Taxation if the disclosure concerns the Company's tax affairs or the tax affairs of an Associate of our Company.

You must not disclose or produce to a court or tribunal any information or documents which discloses the identity of a whistleblower (or information likely to lead their identity becoming known) without seeking the advice of the Company's Legal Counsel, who can be contacted by email at info@travis.partners.

6 Victimization

- (a) You must not cause or threaten any detriment to any person because they are or proposes to be a whistleblower, or they are suspected or believed to be, or could be, a whistleblower.
- (b) You must not:
 - (i) subject a whistleblower to any liability or disciplinary action; or
 - (ii) enforce a remedy or exercise a right against a whistleblower, for making a disclosure.
- (c) However, a whistleblower may be held liable for any personal misconduct revealed by their disclosure or an investigation following a disclosure.

7 Board reporting

Subject to the confidentiality obligations in section 5, the Whistleblower Protection Officer must provide quarterly reports to the Board on all active whistleblower matters, including information on:

- (a) the number and nature of disclosures made in the last quarter;
- (b) the status of any investigations underway; and
- (c) the outcomes of any investigations completed and actions taken as a result of those investigations.

8 Consequences for non-compliance

Any breach of this Policy by an officer, employee or contractor will be taken seriously by the Company and may be the subject of a separate investigation and/or disciplinary action.

A breach of this policy may also contravene provisions of the Corporations Act and give rise to significant civil and/or criminal penalties.

9 Training

The Company provides for periodic training to:

- (a) employees about this procedure and their rights and obligations under it; and
- (b) the Whistleblower Protection Officer and those involved who may receive reports under this policy, on how to handle and respond to reports.

10 Review

In conjunction with the Whistleblower Protection Officer, the Board will review this Policy annually to check that it is operating effectively and whether any changes are required to the Policy. This Policy may be amended by resolution of the Board.

Adopted by the Board on 12 April 2024.