

## GOV\_POL011\_WHISTLEBLOWER POLICY

### 1. PURPOSE

The purpose of this procedure is to encourage the reporting of misconduct, illegal acts, or unethical behaviour within with in or associated with Tasmanian Independent Retailers Coop Pty Ltd (TIR, Island Fresh Produce & IGA Brighton) while protecting individuals from retaliation.

It ensures concerns are investigated properly, fosters a culture of transparency and accountability, and fulfills legal or regulatory obligations. It protects disclosers from reprisal, ensures compliance with the *Modern Slavery Act 2018 (Cth)*, and enables identifying risks in supply chains.

it is intended that as an outcome of this policy:

- **Encourage Reporting:** Creating a safe, trusted, and often anonymous way for employees and stakeholders to speak up about wrongdoing.
- **Protect Reporters:** Safeguarding whistleblowers from retribution, detrimental treatment, or personal harm.
- **Ensure Accountability:** Setting a clear framework for receiving, investigating, and resolving disclosures of unethical, unlawful, or dangerous activity.
- **Meet Legal Requirements:** Assisting organizations with complying with legislation such as the *Corporations Act 2001* and the *Taxation Administration Act 1953*.
- **Prevent Misconduct:** Acting as a deterrent against fraudulent or harmful behaviour, thereby protecting the organization's reputation and the community.
- **Provide Transparency:** Defining how the organization handles reports to ensure confidence in the process.

### 2. SCOPE

This policy applies to all employees, contractors, and visitors whilst on site, whether at a TIR Group facility or otherwise associated with TIR such as suppliers or service providers , who report misconduct, such as illegal, dishonest, or unethical activities. It ensures protection from reprisals, such as dismissal or harassment, and covers disclosures regarding breaches of internal rules, laws, or substantial dangers to safety or the environment.

### 3. OUT OF SCOPE

#### Complaints and grievances

From time to time, you may have a Complaint in relation to service levels, policy decisions, or an employment-related grievance with another person within the organisation, which is not Disclosable Conduct or a breach of the Organisation's rules or policies.

Personal work-related grievances do not qualify for protection under the whistleblower Laws or in this policy.

If you have a Complaint about a policy decision or you wish to raise a grievance issue, refer to PS\_PRO\_Greivance & Resolution Procedure, speak to your supervisor, or the GM People & Safety, Risk & Governance.

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## 4. DEFINITIONS

<b>Whistleblower</b>	is a person make a report of actual or suspected wrongdoing.
<b>Whistleblower Protection Officer</b>	is an independent person appointed to keep the whistleblower informed of progress with, and the outcome of, the investigation into their report.
<b>Investigation Officer</b>	is an independent person appointed to investigate the reported allegations of wrongdoing.
<b>Wrongdoing</b>	covered in this policy includes any conduct that: <ul style="list-style-type: none"> <li>• is illegal, such as theft, violence, threatened violence, and criminal damage against property;</li> <li>• fraud or misappropriation of funds;</li> <li>• offering or accepting a bribe; • financial irregularities; • endangering health and safety;</li> <li>• failure to comply with, or breach of, legal or regulatory requirements, internal policies, or Code of Conduct; and</li> <li>• engaging in 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</li> </ul>

## 5. ROLES & RESPONSIBILITIES OF STAKEHOLDERS

- **Whistleblower (Discloser):**
  - **Reporting:** Reports, ideally with reasonable grounds, misconduct, or illegal activity within the organisation.
  - **Honesty:** Provides accurate information, avoiding knowingly false reports.
  - **Confidentiality:** Often works with the WPO to maintain anonymity.
- **Whistleblower Protection Officer (WPO):**
  - **Handling Reports:** Receives and reviews disclosures of misconduct.
  - **\*Protection:** Takes all reasonable steps to protect the whistleblower's identity and prevent retaliation. \*This is subject to limited exceptions, including disclosure to a legal practitioner for the purpose of obtaining legal advice in relation to the disclosure.
  - **Investigation Management:** Oversees investigations or refers them to authorised persons.
  - **Investigation Outcomes:** is responsible for keeping the whistleblower informed of the outcomes of the investigation into their report, subject to the considerations of the privacy of those against the allegations have been made.
- **Supervisors/Managers:**
  - **Mandatory Reporting:** Must refer any disclosures made to them directly to the WPO immediately.
  - **Non-Retaliation:** Ensures no bullying or harassment occurs against the reporter
  - Notifying the GM People and Safety if there is an emerging concern about compliance with this policy
- **Board/CEO:**
  - **Oversight:** Owns the policy, ensuring it is effective, compliant, and well-publicised.
  - **Culture:** Promotes a culture of openness and ethical behaviour.
  - **Action:** Authorises remedial actions arising from investigations.

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- **Investigation Officer**
  - **Investigation:** Carry out an investigation based on facts, ensuring confidentiality is maintained at all times.
  - **Investigation Outcomes:** The investigation Officer will keep the Whistleblower Protection Officer informed of the progress and outcome of the investigation.

## 6. PROCEDURE

If you suspect, or are aware of actual wrongdoing, you are required to make a direct report to an identified Whistleblower Protection Officer.

- GM People Safety Risk & Governance
- Chairman of the TIR Board

The report must contain enough information to form a reasonable basis for an investigation. Details should include:

- date, time, and location
- name of person(s) involved and their role/ roles
- your relationship with the person(s) involved
- the general nature of your concern
- how you became aware of the issue
- possible witness; and
- other information that you have to support your report

If you choose to make your report anonymously, you will still be protected under the Whistleblower Laws. However, complete anonymity may practically cause limitations for us to assess and investigate the issue or take action we would like to take\*.

By letting us know who you are, we can contact you directly to discuss your concerns, which will help us investigate the complaint more quickly and efficiently.

We can also appoint a Whistleblower Protection Officer to assist with any questions or concerns you have about the process.

Commonwealth and Tasmanian Law provide prohibits disclosure of the identity of a whistleblower, or information likely to lead to the identification of a whistleblower without your consent.

\*This is subject to limited exceptions, including disclosure to a legal practitioner for the purpose of obtaining legal advice in relation to the disclosure.

## 7. PROTECTION

A whistleblower (Discloser) must make a report directly to an eligible recipient to qualify for protections under the Whistleblower Laws and this Policy. These protections include:

- Identity protection
- Protection from harm, damage, injury, disadvantage, and loss.
- Compensation and remedies; and
- Civil, criminal, and administrative liability protection.

TIR is committed to protecting and respecting the rights of a person who reports wrongdoing in good faith and will not tolerate any retaliatory action or threats of retaliatory action against any person who has made or who is believed to have made a report of wrongdoing. For example, the person must not be disadvantaged or victimised by having made the report by:

- Dismissal
- Demotion
- Any form of harassment

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- Discrimination
- Current or future bias
- Threats of any of the above

Any such retaliatory action or victimisation in reprisal for a report being made under this policy will be treated as serious misconduct and will result in disciplinary action, which may include dismissal.

## 8. INVESTIGATION

All reports of alleged or suspected wrongdoing made under this policy will be assessed, and if appropriate, may include appointing an independent (internal or external) investigation officer with the objective of sourcing evidence that either substantiates or refutes the claims made by the whistleblower.

While the circumstances of each report may require different investigation steps, all investigations will:

- follow a fair process
- be conducted as quickly and efficiently as the circumstances permit
- determine whether there is enough evidence to substantiate the matters reported; and
- be independent of the person(s) concerned with the allegations.

TIR will provide feedback, as appropriate on the progress and expected timeframes of investigation.

Whistleblower Protection Officer is responsible for keeping the whistleblower informed of the outcomes of the investigation into their report, subject to the considerations of the privacy of those against the allegations have been made. Investigation Officer is responsible to conduct investigations in a fair and independent manner. This means the investigations must be independent from the business department concerned, the whistleblower and any person who is subject of the report.

The investigation Officer will keep the Whistleblower Protection Officer informed of the progress and outcome of the investigation.

## 9. SUPPORT

TIR will support you where you have concerns about detrimental conduct or the investigation process.

An Employee Assistance Program (EAP) is also available to our employees (and their immediate family members).

The EAP is a confidential third-party provider; Access EAP and they can be contacted on 1800 818 728.

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