

EXPERIENCECO

COMPANY:	Experience Co Limited and all Group Companies (the Company / Experience Co/ EXP / Group)
TITLE:	Whistle-Blower Policy
DEPARTMENT:	Human Resources
ISSUE DATE:	August 2019
REVIEW DATE	February 2020

PURPOSE

Experience Co is committed to the highest standards of ethical practices and honest relationships and to the protection of individuals who report in good faith instances or allegations of wrongdoing (refer below).

Management and the Board of Directors of Experience Co have adopted this policy with the aim to encourage all persons to report any wrongdoing in good faith and in an environment free from victimisation so that the Board and Senior Management can address any improper conduct. A copy of this policy is available on the Company's website at www.experienceco.com.

COVERAGE

This policy applies to the Company's current and former employees, contractors, officers, directors and suppliers of goods or services, associates and relatives and dependents of these individual (whistleblower/person/s).

WHAT IS WRONGDOING?

Wrongdoing includes the following activities which may cause financial loss to EXP or may damage its reputation or otherwise may amount to serious improper conduct:

- A breach of laws or regulations;
- Dishonest, corrupt, fraudulent or other illegal or unethical conduct or activity;
- Conduct endangering health and safety;
- Conduct that is contrary to, or in breach of, Experience Co's Codes and Policies;
- Conduct involving substantial risk to the environment;
- A substantial mismanagement of Experience Co's resources;
- Conduct that is detrimental to Experience Co's financial position or reputation.

This policy does not cover workplace grievances. Workplace grievances should be reported through your manager or supervisor. It is a serious disciplinary offence to make allegations that prove to be unsubstantiated and made maliciously or known to be false.

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HOW DO I REPORT WRONGDOING?

Any person who has reasonable grounds to suspect that any wrongdoing has occurred, can report wrongdoing through:

1. Their direct Manager. Depending on the nature of the wrongdoing, any person is encouraged to first discuss their concern with their Manager. Alternatively, if the person does not feel comfortable speaking with their Manager, they can raise the concern with an officer or senior manager of the Company directly;

or
2. The Whistleblowing officer; by emailing the Whistleblower Officer on whistleblower@experienceco.com;

or
3. Anonymously; in writing for the attention of the Whistleblower Officer at PO Box 5361, Wollongong, NSW 2500 – marked as private and confidential.

The identity of or information likely to lead to the identification of the Whistleblower will only be disclosed with the consent of the whistleblower. Civil penalties apply to companies that do not protect the confidentiality of Whistleblowers.

Any person reporting wrongdoing either to their Manager or the relevant support area can be assured that they will be protected and that the investigation will be conducted in accordance with the principles of fairness and natural justice. Any employees involved in the investigation must treat the matter confidentially and must not disclose the identity of the Whistleblower without their consent.

This policy does not prevent any person from reporting wrongdoing to the Company's auditor or a regulator under any applicable law.

The Whistleblower may or may not wish to remain anonymous when making a report. However, employees are encouraged to provide their identity to enable effective investigation of wrongdoing.

INVESTIGATING WRONGDOING

Where applicable, the Whistleblower officer will notify the complainant and acknowledge receipt of a report of wrongdoing within 7 business days.

Investigations of allegations of wrongdoing will be conducted in a manner that is confidential, fair and objective.

The investigation processes will vary depending on the nature of the alleged wrongdoing and the amount of information provided. All reports will be promptly evaluated and investigated, although the seriousness and complexity of the concern may affect the time needed to investigate the matter.

Material incidents reported under this policy will be reported to the Company's Audit & Risk Committee.

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It is a breach of this policy and EXP forbids any employee from penalising any person who in good faith reports an instance or allegation of wrongdoing in accordance with this Policy. This includes any reprimand, reprisal, change in work duties, change in employment amenities, change in reporting requirements, damage to career prospects or reputation, threats to do any of these or deliberate omissions which damage the person.

BREACH

Adherence to this Policy is a condition of employment, engagement and / or terms of contract at Experience Co. Breaches may be subject to disciplinary action including termination of employment or contract, as appropriate.

REVIEW AND AVAILABILITY

This Policy may be amended with the approval of the Board to ensure that it complies with legislative changes and that it meets best practice standards.

This policy will be available on the company's internal intranet.