65 York Street, Level 9 Sydney NSW 2000 Australia www.kollakorn.com



# KOLLAKORN CORPORATION LIMITED

# ACN 003 218 862

# WHISTLEBLOWER POLICY

# 1. INTRODUCTION

- 1.1. Kollakorn Corporation Limited (KKL, or the Company) is committed to maintaining a culture of integrity, honesty, transparency and ethical behaviour. This Policy outlines a process whereby a whistleblower can raise concerns regarding wrongdoing by the Company or its representatives without fear of intimidation, discriminatory treatment or reprisal.
- 1.2. KKL encourages the reporting of any suspected unethical or illegal behaviour and will protect any officer or employee who raises such a concern. This Policy is publicly available via the 'Corporate Governance' section of the Company's website.

## 2. REPORTABLE CONCERNS

Reportable concerns under this Policy include an actual or suspected:

- Breach of the Company's Code of Conduct or other policy
- Illegal activities
- Conduct that constitutes bribery, corruption or abuse of authority
- Theft or misappropriation of Argo property
- Bullying or harassment
- Other serious impropriety

### 3. MAKING A REPORT

A person making a report under this Policy is referred to as a 'whistleblower' and all information provided by them will be treated as confidential.

#### (a) Report to the executive team

A KKL employee or other person who become aware of a Reportable Concern, is encouraged to report the matter to the Company Secretary or to the CEO, OR, alternatively

#### (b) <u>Report anonymously</u>

If the concern is considered unsuitable for investigation by executive management or the person wishes their identity to remain anonymous to executive management, the Company provides the following confidential reporting lines:

# By EMAIL:

Direct to Mr. Riad Tayeh, Chairman of KKL, via an external email address:

### rtayeh@dvtgroup.com.au

OR

Direct to Mr. Nick Aston, Non-executive Director of KKL, via an external email address: nick@brentnallsnsw.com.au

### By POST:

### Private and confidential – open by addressee only

Mr. Riad Tayeh, **or** Mr. Nick Aston, Kollakorn Corporation Limited Level 9, 65 York Street, Sydney, NSW, 2000.

A person who makes a report to these email addresses or to this postal address will be treated as anonymous and their personal details will not be disclosed.

# 4. INVESTIGATING A REPORT

- 4.1. The investigative process will depend on the nature of the conduct being investigated and who is implicated in the reported concern. It may be managed internally or externally as appropriate. The Company's objective is that all investigations be conducted in a manner that is fair and objective to those involved.
- 4.2. All concerns will be investigated as soon as is reasonably practicable and in a confidential, objective and discreet manner. No particulars that would reveal a whistleblower's identity will be disclosed without first obtaining consent.
- 4.3. If not reported anonymously, the whistleblower will be interviewed privately and may be asked to sign a written statement containing the relevant facts.
- 4.4. At the end of an investigation, a report will be completed and provided to the Managing Director, or if appropriate to the Board. Reports and records created will be secured and protected as confidential.
- 4.5. A whistleblower will be kept informed of the investigative process, its progress and its outcomes including the course of action the Company proposes to take or if no action is proposed, an appropriate explanation. If reported anonymously, feedback will be provided via Mr. Tayeh or Mr Aston.

# 5. PROTECTION OF WHISTLEBLOWERS

- 5.1. KKL is committed to ensuring whistleblowers are afforded confidentiality in respect of any matter raised under this Policy and that they do not suffer detriment as a result of reporting a concern.
- 5.2. 'Detriment' includes dismissal, demotion, harassment, victimisation, discrimination, disciplinary action, bias, threat or other unfavourable treatment.
- 5.3. There are special protections are available to whistleblowers who disclose conduct which may breach the Corporations Act where particular conditions are satisfied see Appendix.

### 6. POLICY REVIEW

This Policy was will be reviewed annually.

Date:

<sup>TH</sup> December 2019

Signed:

Chainserson of the Board of Directors of Kollakorn Corporation Limited