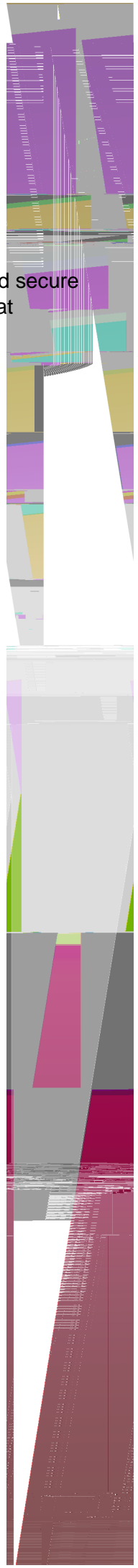




SCECGS Redlands Limited (ACN 001 336 269) (the School) is committed to providing a safe and secure means of disclosing wrongdoing and encouraging those who are aware of potential wrongdoing at the School to have the confidence to speak up, without fear of reprisal.





Whistleblower Protection Officer	the Deputy Principal or such other person authorised by the Principal to receive disclosures that may qualify for protection under the <i>Corporations Act</i> . If the disclosure relates to the Deputy Principal, the disclosure should be made to an alternate Whistleblower Protection Officer (meaning the chair of the Board and/or the Principal) as listed in Appendix 1.
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Other expressions used in this policy but not defined above have the same meanings as they are given in Part 9.4AAA of the *Corporations Act*.

4. Scope

- 4.1 This policy applies to the School and all Eligible Whistleblowers and Eligible Recipients of disclosures under this policy.
- 4.2 Eligible Whistleblowers qualify for protection as a whistleblower under the Corporations Act if:
- (a) they have made a Protected Disclosure directly to an Eligible Recipient or to ASIC, APRA or another Commonwealth body prescribed by regulation;
 - (b) they have made a disclosure to a legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the whistleblower provisions in the Corporations Act; or
 - (c) they have made an emergency disclosure or public interest disclosure in accordance with the requirements of the Corporations Act.

5. Eligible Whistleblowers: Who can make a Protected Disclosure?

- 5.1 This policy applies to anyone who makes a disclosure that qualifies for protection and is an Eligible Whistleblower. For the purpose of this policy, an Eligible Whistleblower is an individual who is, or has been, any of the following persons:
- (a) an employee, whether full-time, part-time or casual, of the School;
 - (b) a School Officer (including a director or company secretary);
 - (c) an individual who supplies services or goods to the School (whether paid or unpaid);
 - (d) an employee of a person that supplies services or goods to the School (whether paid or unpaid);
 - (e) an individual who is an associate of the School;
 - (f) the spouse, parent or remoter lineal ancestor, child or remoter issue, or brother or sister of an individual listed in clause 5(a) – (e); and
 - (g) a dependant of an individual referred to in any of paragraphs (a) to (e), or of such an individual's spouse.
- 5.2 If a person is unsure about whether they are an Eligible Whistleblower, they are encouraged to ask the Whistleblower Protection Officer or seek independent legal advice.



6. What is a Protected Disclosure?

- 6.1 For the purpose of this policy, a Protected Disclosure is a disclosure of information to an Eligible Recipient by an Eligible Whistleblower who has reasonable grounds to suspect that the information concerns misconduct, or an improper state of affairs or circumstances, in relation to the School or a related body corporate of the School.

- 6.2 If a disclosure is made without 'reasonable grounds to suspect', the disclosure will not be recognised as a Protected Disclosure.







- (d) allowing Eligible Whistleblowers to perform their duties from home or another suitable location, or to take leave (if required);
- (e) monitoring for risk of isolation, harassment, conflicts or risk to the Eligible Whistleblower's identity; and
- (f) interventions for protecting an Eligible Whistleblower if detriment has already occurred, including investigating and addressing the detrimental conduct by taking disciplinary action where necessary.

- 12.6 If the Eligible Whistleblower was involved in the conduct that was the subject of the disclosure, the fact the Eligible Whistleblower has made the disclosure may be considered when determining the severity of any disciplinary measures.
- 12.7 Eligible Whistleblowers may seek independent legal advice or contact regulatory bodies such as ASIC or the ATO if they believe they have suffered detriment.
- 12.8 Subject to this policy and the *Corporations Act*, an Eligible Whistleblower is protected even if the allegations or concerns prove to be incorrect (although a person who maliciously or dishonestly makes a disclosure may be subject to disciplinary action).

13.



their identity to be disclosed. A Whistleblower may request their identity remain confidential to the investigator where appropriate.

14.5 All investigations must be conducted fairly, with due regard for the nature of the allegation and the rights of the persons involved in the investigation. Investigations are to involve the following process:

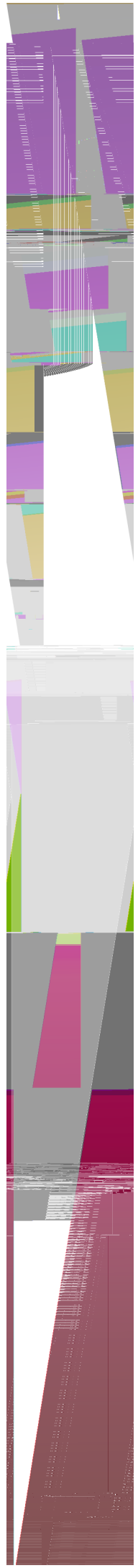
- a) The principles of procedural fairness must be adhered to in all investigations including:
 - i. an unbiased investigator;
 - ii. allegations being put to any person against whom they have been made;
 - iii. that person being given opportunity to respond to the allegations;
 - iv.





If you have a query about this policy or need more information, please contact the Whistleblower Protection Officer.

18.





APPENDIX 1

Internal Eligible Recipient Contact Details

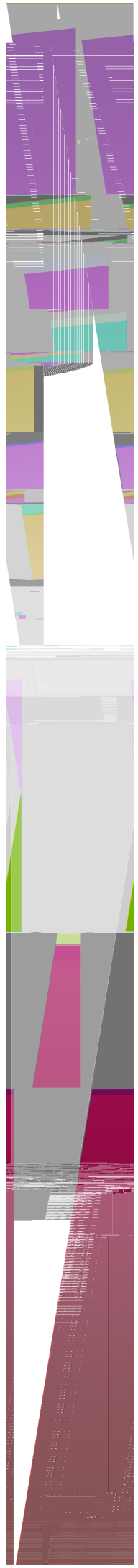
Role	Contact details
Whistleblower Protection Officer: Deputy Principal	Email: deputy.principal@redlands.nsw.edu.au Address: 272 Military Road, Cremorne NSW 2090, Australia
alternate Whistleblower Protection Officer: Principal	Email: principal@redlands.nsw.edu.au Address: 272 Military Road, Cremorne NSW 2090, Australia
alternate Whistleblower Protection Officer: Board Chair	Email: boardchair@redlands.nsw.edu.au Address: 272 Military Road, Cremorne NSW 2090, Australia
alternate Whistleblower Protection Officer: Chief Financial Officer / Company Secretary	Email: cosec@redlands.nsw.edu.au Address: 272 Military Road, Cremorne NSW 2090, Australia



APPENDIX 2

Protections for Eligible Whistleblowers under the

Protection	Summary of Protection
Identity Protection (Confidentiality)	<p>Any information that could lead to the identity of the Eligible Whistleblower is prohibited from being disclosed unless the information disclosed is:</p> <ul style="list-style-type: none"> (a) to ASIC or the Australian Federal Police; (b) to a legal practitioner; (c) to a person or body prescribed by the <i>Corporations Regulations 2001</i>; or (d) with the consent of the Eligible Whistleblower. <p>Disclosure with or without the consent of the Eligible Whistleblower is permitted provided that all reasonable steps are taken to reduce the risk of identification of the Eligible Whistleblower.</p>
Protection from Detrimental Acts or Omissions	<p>A person must not engage or threaten to engage in detrimental conduct towards an Eligible Whistleblower who has made or proposes to make a disclosure that warrants protection.</p> <p>Detrimental conduct includes:</p> <ul style="list-style-type: none"> (a) dismissal of an employee; (b) injury of an employee during their employment; (c) modifying an employee's position or role to their detriment; (d) discrimination from other employees; (e)





Compensation and other Remedies	<p>An Eligible Whistleblower may seek compensation and other remedies through the courts if:</p> <ul style="list-style-type: none">(a) they suffer loss, damage or injury because of a disclosure; and(b) the entity failed to take reasonable precautions to prevent the detrimental conduct;
Civil, Criminal and Administrative Liability Protection	<p>If an Eligible Whistleblower makes a disclosure, they must be protected from:</p> <ul style="list-style-type: none">(a) civil liability, including any legal action;(b) criminal liability; and(c) administrative liability. <p>However, protection must not extend to an Eligible Whistleblower who has engaged in misconduct.</p>

