

## Whistleblower Policy

### 1. Policy statement

The Foundation is committed to the highest standards of ethical conduct, integrity and good corporate governance.

The Leukaemia Foundation (the Foundation or LFA) encourages Workplace Participants and other eligible persons to **speak-up** if they become aware of misconduct or an improper state of affairs or circumstances in relation to the Foundation.

The Foundation provides internal and independent external reporting pathways, including an external whistleblowing service provider, to support disclosures where a Workplace Participant prefers or considers it necessary to bypass internal channels. Disclosures may be made confidentially and, where elected by the Whistleblower, anonymously.

The Foundation will not tolerate victimisation, detriment or retaliation against any person who makes a disclosure in accordance with this Policy.

This Policy does not form part of a Workplace Participant's employment or service contract.

### 2. Purpose

The purpose of this Policy is to:

- encourage the reporting of misconduct or an improper state of affairs or circumstances in relation to the Foundation,
- support the reporting of matters that may be serious in nature or involve systematic issues, while ensuring all eligible Disclosures are appropriately assessed;
- ensure that individuals who make a Disclosure on reasonable grounds can do so safely, securely and with confidence; and
- ensure compliance with the whistleblower protection provisions under the Corporations Act 2001 (Cth).

### 3. Application

This Policy applies to all current and former Workplace Participants, including officers and directors, contractors, suppliers and consultants (and their employees), volunteers, and the relatives, dependants or spouses of any of these individuals, who are eligible whistleblowers under the Corporations Act 2001 (Cth).

This Policy applies to conduct occurring in Australia or overseas in connection with the Foundation.

### 4. What can be reported (Disclosable Matters)

A Disclosure qualifies for protection under this Policy if the whistleblower has reasonable grounds to suspect:

- misconduct or an improper state of affairs or circumstances in relation to the Foundation;
- conduct that constitutes an offence against, or a contravention of:
  - the *Corporations Act 2001 (Cth)*;
  - the *Australian Securities and Investments Commission Act 2001 (Cth)*;
  - financial services legislation; or
  - any other Commonwealth law punishable by imprisonment of 12 months or more;
- conduct that represents a danger to the public or LFA's financial system.

Examples may include (but are not limited to):

- fraud, theft or corruption;
- misuse of client information or records;
- dishonest or unethical behaviour;
- serious breaches of the Code of Conduct;

- financial irregularities;
- systemic breaches of law.

Personal work-related grievances (for example interpersonal conflicts or performance management matters) are generally not in-scope for this policy or under whistleblower laws unless they involve victimisation or have significant implications beyond the individual. Instead refer to the Foundations Grievance Policy.

### 5. How to make a disclosure

A Disclosure may be made to any of the following **eligible recipients**:

- the Chief Executive Officer;
- the Chair of the Board;
- the Company Secretary;
- an auditor or member of an audit team conducting an audit of the Foundation (e.g. Grant Thornton); or
- the Australian Securities and Investments Commission (ASIC) or another prescribed regulator, in accordance with the Corporations Act 2001 (Cth).

Disclosures may be made to internal or external recipients. Individuals are encouraged to use their judgement in selecting the most appropriate reporting channel in the circumstances. Where a disclosure concerns, or may involve, an eligible recipient or another senior representative of the organisation, staff are encouraged to make their report through Stopline to ensure the matter can be managed independently and confidentially

At the time of writing this policy, Stopline is the Foundation's external whistleblowing service provider). Stopline enables disclosures to be made confidentially and anonymously via their confidential and comprehensive reporting channels. For further details, refer <https://www.stopline.com.au/>

The Foundation encourages whistleblowers to provide sufficient information to allow proper investigation of the matter.

### 6. Confidentiality & anonymity

The identity of a whistleblower (or information likely to identify them) will not be disclosed unless:

- the whistleblower consents; or
- disclosure is permitted or required by law.

A whistleblower may choose to remain anonymous when making a disclosure and throughout any investigation process.

### 7. Protection from detriment

A person who makes a Disclosure in accordance with this Policy is protected from:

- dismissal;
- injury or alteration of employment;
- harassment or intimidation;
- discrimination;
- damage to reputation; or
- any other form of detriment or retaliation.

Any person who engages in victimisation or detrimental conduct against a whistleblower will be subject to disciplinary action, which may include termination of employment or engagement.

## 8. Investigation of Disclosures

All qualifying Disclosures will be assessed and, where appropriate, investigated in a timely, fair and objective manner.

Investigations will be conducted with due regard to confidentiality and procedural fairness.

Where appropriate, findings will be reported to the Board or a relevant Board Committee.

Subject to confidentiality, privacy and legal considerations, the whistleblower will be kept informed of the progress and outcome of the investigation.

The level of information provided may be limited to protect confidentiality and the integrity of the investigation.

## 9. Roles & Responsibilities

Role	Responsibilities
<b>The Board of Directors</b>	<ul style="list-style-type: none"> <li>Oversee the effectiveness of this Policy</li> <li>Ensure appropriate governance and oversight of whistleblower matters</li> </ul>
<b>Company Secretary</b>	<ul style="list-style-type: none"> <li>Maintain oversight of whistleblower reporting mechanisms</li> <li>Ensure compliance with legislative obligations</li> </ul>
<b>Chief Executive Officer and all Executive Leaders</b>	<ul style="list-style-type: none"> <li>Ensure all workplace participants are aware of this Policy and make it easily accessible.</li> <li>Promote an organisational culture that is in line with this Policy.</li> <li>Promote a culture that encourages speaking up</li> <li>Ensure appropriate investigation and response to disclosures</li> </ul>
<b>People Leaders</b>	<ul style="list-style-type: none"> <li>Support a culture where concerns can be raised safely</li> <li>Ensure the implementation of this Policy and related policies/procedures within their teams.</li> <li>Immediately escalate disclosures received in accordance with this policy</li> <li>Support their teams to comply with this Policy and associated policies/procedures.</li> </ul>
<b>Workplace Participant</b>	<ul style="list-style-type: none"> <li>Report suspected misconduct in accordance with this Policy</li> <li>Ensure compliance with this Policy and associated policies/procedures.</li> </ul>
<b>ALL persons</b>	<ul style="list-style-type: none"> <li>Refrain from victimising or retaliating against whistleblowers</li> </ul>

## 10. Associated Internal Documents

- Code of Conduct
- Grievance Policy
- Workplace Bullying Policy

## 11. Related External Recourses

- Corporations Act 2001 (Cth)
- Australian Securities and Investments Commission Act 2001 (Cth)
- Australian Charities and Not for Profits Commission (ACNC). Whistleblower processes support compliance with Governance Standards 2, 3 and 5
- <https://www.stopline.com.au>

## 12. Breach

The Foundation promotes a culture where employees are treated with fairness and dignity; and respectful behaviour is the only acceptable way of conducting business. Any breach of this Policy, including victimisation of a whistleblower or unauthorised disclosure of a whistleblower's identity, may result in disciplinary action up to and including termination of employment or engagement.

All workplace participants are required to comply with this policy and any wilful breaches maybe be subject to disciplinary action. Such action may include termination of employment.

## 13. Terms & Definitions

Term	Definition
<b>Detriment</b>	Any actual or threatened disadvantage suffered by a person because they made, or may make, a disclosure. This includes dismissal, demotion, harassment, intimidation, discrimination, injury, damage to reputation, or any other unfavourable treatment
<b>Disclosures</b>	<p><b>A disclosable matter:</b> Information where the whistleblower has reasonable grounds to suspect misconduct or an improper state of affairs or circumstances including conduct that breaches Commonwealth legislation or represents a danger to the public or financial system.</p> <p><b>A protected disclosure:</b> A disclosure that qualifies for protection under Part 9.4AAA of the <i>Corporations Act 2001 (Cth)</i> because it is made by an eligible whistleblower to an eligible recipient about a disclosable matter.</p>
<b>Eligible recipient</b>	A person authorised under the <i>Corporations Act 2001 (Cth)</i> to receive protected disclosures. This includes an officer, director, senior manager, auditor, or a person authorised by the Foundation to receive disclosures (including StopLine).
<b>Eligible whistleblower</b>	An individual who is eligible for protection under the <i>Corporations Act 2001 (Cth)</i> . This includes current and former employees, officers, directors, contractors, suppliers (and their employees), volunteers, associates, and relatives or dependants of any of these individuals.
<b>Personal work-related grievance</b>	A grievance about a matter that relates to the discloser's current or former employment or engagement and has implications for the discloser personally but does not have significant implications for the Foundation beyond the individual. These matters are generally dealt with under the Grievance Policy and are not protected disclosures unless an exception applies under the Corporations Act.
<b>Retaliation</b>	Any action taken to punish, disadvantage or adversely treat a person because they have made, propose to make, or are suspected of making a protected disclosure. Retaliation includes victimisation and the causing of detriment.
<b>Victimisation</b>	Subjecting, or threatening to subject, a person to detriment because they have made, propose to make, or could make a protected disclosure.
<b>Workplace Participant</b>	Board Directors, employees (full-time, part-time, temporary or casual), contractors, subcontractors, volunteers and temporary staff, collectively referred to in this Policy as 'workplace participants'

## 14. Policy History

Responsibility		Company Secretary	
Policy Number/ Reference		01-PO-WhistleblowersPolicy[v01_15May2026]	
Reviewed by		General Manager People & Culture	
Review date		May 2028	
Version	Authorisation	Commencement date	Amendment
v1	Board	May	New policy