



Colonial Foundation - Whistleblower Policy

This policy encourages the disclosure of wrongdoing and sets out how the Foundation protects and supports anyone who makes a disclosure. References in this policy to 'the Foundation' are to Colonial Foundation Limited, as trustee for the Colonial Foundation Trust.

Who can make a disclosure

Current and former Directors, employees, contractors and suppliers, and their relatives or dependants, are 'eligible whistleblowers' under Part 9.4AAA of the Corporations Act 2001 (Cth) and receive the statutory protections it provides. As a matter of Foundation policy, we extend the same reporting channel to current and former grant recipients and where possible the same protections, even though the Corporations Act does not require this.

What can be reported

Disclosures can cover conduct that is dishonest, fraudulent, corrupt, illegal, or that represents a danger to the public, or a breach of our policies — whether or not it directly affects the discloser.

How to report

A disclosure can be made to the CEO, or to the Chair if the concern involves the CEO. A discloser may instead report to the Foundation's external auditor or legal adviser if they prefer. Disclosures may be made anonymously.

Protections

The Foundation will keep a discloser's identity confidential to the extent permitted by law, and will not tolerate any detrimental treatment of someone who makes a disclosure in good faith. Victimising or retaliating against a whistleblower is a breach of this policy and, where the discloser is an eligible whistleblower under the Corporations Act, may also be a criminal offence under that Act.

Investigation

The Chair (or a delegate free of any conflict) oversees a fair, timely and confidential investigation of each disclosure, and reports the outcome to the Board.

Review

This policy is reviewed annually.