

## PAG-HR-0021 CORPORATE ETHICS & WHISTLEBLOWING POLICY

### PURPOSE OF THE POLICY

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Precise Air Group is committed to promoting a culture in which honesty, integrity and business ethics are a part of everyday behaviour by encouraging employees to report any matters, in good faith, which may be considered unethical, illegal or act of serious wrongdoing, without fear of intimidation or reprisal. This policy establishes a framework which helps to identify instances of wrongdoing and provides guidance on how to raise a concern about suspected or actual unethical or unlawful behaviour. This framework ensures that all complaints and reports of misconduct are addressed timely and thoroughly with the highest standards of confidentiality, objectivity and fairness in compliance with Company policies and applicable laws and regulations and also sets out the protections and support available to individuals who make a report.

### SCOPE OF THE POLICY

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This policy applies to all Directors, employees, contractors and temporary staff regardless of status, when performing work or activities, across Precise Air Group of Companies. This policy is an integral part of the Company's internal control policy framework and should be read and applied in conjunction with all applicable Company policies and procedures.

### Whistleblower

A whistleblower is an individual with inside knowledge of an organisation who reports misconduct, dishonest or illegal activity that may have occurred within that organisation in accordance with this Policy. A whistleblower has the right to report a concern without reprisal.

### Reportable Conduct

Under this policy, Reportable Conduct is conduct by a Director, employee, contractor and temporary staff or other person who has business dealings with the Company which is, in the view of the whistleblower acting in good faith:

- against the law or represents a failure by the Company to comply with any legal or regulatory obligations;
- dishonest, fraudulent or corrupt conduct, including soliciting, accepting or offering a bribe, facilitation of irregular payments or other such benefits;
- misleading or deceptive, including questionable accounting, financial reporting or auditing practices either by, or affecting, the Company;
- likely to cause financial loss to the Company, damage its reputation, or be otherwise detrimental to the Company;
- potentially damaging to the Company, its employees or business associates, including unsafe work practices, environmental damages, health risks, or wasting of Company resources;
- coercion, harassment, victimisation or discrimination;
- involving any other kind of serious impropriety including retaliation against a Whistleblower;
- deliberate concealment of any of the above.

This is not an exhaustive list of the types of wrongdoing that may be reported under this policy.

## Reporting Personal Work Related Grievances

Any matters of concern, complaints or grievances should be reported promptly to the Supervisor or direct line manager. Where this is not appropriate and/or the employee does not feel comfortable or where an employee has made an internal report but no action has been taken within a reasonable timeframe, they can refer the matter to the Human Resources department or to the Managing Director directly in accordance with the Company's Grievance Policy. These matters may be protected under other legislation such as the *Fair Work Act 2009* (Cth).

## Reporting Wrongdoing or Reportable Conduct

For reports of conduct or activities that are so serious in nature they amount to wrongdoing should be directed through the Whispli site <https://whispli.com> providing as much information as possible as not to compromise the ability to fully investigate the matter. The report will be directed anonymously to the Case Manager who will be a senior manager of the business. The level of seniority depends on the individual that the accusation is made towards, for example if the allegation is about a senior manager, the report will be referred to the Managing Director. The *Fair Work (Registered Organisations) Act 2009* (RO Act) protects a person who makes a protected disclosure even if the matter is only reported to the registered organisation as long as it meets certain eligibility criteria and could have been reported to the Commission.

## Bad Faith Accusations

A Whistleblower must have reasonable grounds for a report made under this Policy. A rumour or mere allegation with no supporting information is unlikely to be considered as having "reasonable grounds". If an individual makes a false accusation, profound consequences could apply such as loss of employment for a direct employee or termination of a contract for a contractor and potential court action which may include substantial penalties.

## Investigations

Any disclosure of wrongdoing received will be dealt with seriously and enquiries will be made. Depending on the nature of the alleged wrongdoing and the information provided by the Whistleblower through the Whispli site <https://whispli.com> an investigation into the allegations may be conducted by an appropriately qualified internal or external investigator. Investigations will be kept consistent. Participants in the investigations will be able to choose to have a witness and parties are asked not to disclose any information about the investigation.

## Confidentiality

Investigations of wrongdoing will be conducted in a manner that is fair and objective and the extent possible, confidential. Information relating to the reported conduct will be treated with confidentiality to the extent permitted by applicable laws and regulations and may be disclosed to others who have a legitimate need to know if required as part of the investigation, or by procedural fairness or natural justice, the law or a regulator, court or tribunal.

The Whistleblower IP address will be deleted, making identity impossible to trace and any updates about the investigation will be made via the Whispli site. This is important in order to protect the

Whistleblower, the integrity of the investigation, the reputations of persons suspected but subsequently found innocent of wrongful conduct, and to protect the Company from potential civil or criminal liability.

## Reporting and Governance

Where appropriate, information regarding a disclosure made by a Whistleblower, or the outcome of any investigation or alleged wrongdoing, may be reported to the Executive Leadership Team for appropriate action.

Where an allegation of wrongdoing is disclosed, it may be referred to an external agency, such as the police, as appropriate. This Policy does not prevent employees from reporting wrongdoing to an external regulator under applicable law, but this Policy should be applied in the first instance wherever appropriate and practicable.

## Anti-Retaliation – Protection for Whistleblowers

The Company values honesty, integrity and efforts made by employees and third parties associated with the business to protect the Company and its reputation. Employees are encouraged to promptly speak up and report all Reportable Conduct in good faith. No person shall be subject to actual or threatened disadvantage, discrimination, dismissal, victimisation or reprisal for reporting a wrongdoing in good faith under this Policy. Employees are protected under the Act for that State.

The Company does not tolerate any retaliation by management or any other person or entity, directly or indirectly, against anyone who, in good faith, reports an ethics or compliance concern or known or potential misconduct, or assists in a review or investigation thereof. Retaliation includes but is not limited to harassment, intimidation, coercion, on unfavourable change in work hours or schedule, demotion, transfer, suspension, or termination of anyone raising a complaint or allegation.

Any acts of retaliation, including trying to find out the identity of a Whistleblower, witnesses or information pertaining to the investigation, can lead to disciplinary action, up to and including termination of employment or business relationship in the case of third parties.

It is important to note that making a report will not protect the Whistleblower from the consequences flowing from any involvement in the wrongdoing itself. If a Whistleblower makes a disclosure in bad faith, such as an allegation that he or she knows to be false, then disciplinary action may occur, and the protections set out under this policy will not apply (see also above: Bad Faith Accusations).

## Support when raising concerns

For Whistleblowing matters, employees are encouraged to obtain assistance through the Company-sponsored Employee Assistance Program, AccessEAP (in Australia 1800 818 728 or <https://www.accesseap.com.au>) for support when raising concerns under this Policy.

## Training and reinforcement

Precise Air Group shall ensure that all levels of staff, new and existing, including the Board, are trained and understand the importance of ethical values, and how to use the Code of Conduct to support decision-making. The Company will commit to Ethics and Compliance training every two years (e-learning and face-to-face) to reinforce the message of the training. Adherence to this Policy will ensure that concerns regarding Reportable Conduct are able to be raised without fear of victimisation or reprisal.

## Record retention period and disposal

Where the Company has engaged an external investigator, the following information must be provided to the Company on completion of the investigation:

- the investigation report, and the evidence relevant to the breach decision and any sanction decision, for record purposes
- copies of any draft material provided to the employee for comment
- the employee's response to the correspondence

Records relating to misconduct matters include records of:

- allegations of misconduct where no investigation is undertaken
- misconduct action, including matters which formed the basis for such action, and breach determinations
- misconduct investigations that find no breach of the Code of Conduct
- decisions about the imposition and implementation of a sanction
- reviews of, or litigation about, misconduct action

## Finding of no misconduct

Where an investigation results in a finding of no breach of the Code of Conduct, records should be kept for 18 months after that decision is taken. However, a longer period, as specified below, may apply where the employee or former employee requests it. That longer period is:

- seven years after the last action relating to the alleged misconduct

The employee or former employee may also request that the records be destroyed at a specified time.

If a decision is made not to investigate an allegation of misconduct, for example because there is no utility in investigating the matter, or the allegation is considered frivolous or vexatious or without substance, or if the Company decides to discontinue an investigation into alleged misconduct, for example if the employee resigns during the course of an investigation, all records are to be kept for at least 18 months after the last action in the file.

## Finding of misconduct

The Human Resources department will retain for a period of at least five years all records relating to a finding of misconduct. If during this period, there have been no new breaches of the Code of Conduct, the records may be destroyed and any cross-reference made in the employee's personnel file can be removed. The employee or former employee shall be informed in writing that the

misconduct record has been destroyed and that any reference in their personnel file has also been removed.

### **Policy Availability**

This Policy shall be made available on the Company's intranet. The Ethics and Compliance training programme is available on Precise Air Express Learning Management System (LMS) training portal to serve as a refresher for existing employees and for new starters to complete upon onboarding.

### **Linked Legislation**

Whistleblowers Bill 2017 – Australia

The *Fair Work Act 2009* (Cth)

The *Fair Work (Registered Organisations) Act 2009* (RO Act)

### **Linked Documents**

Precise Air Employee Handbook

Corporate Responsibility Policy

EEO and Discrimination Policy

Precise Air Grievance Policy

Work Health & Safety Policy including Drugs & Alcohol

Incident Reporting and Investigation Procedure

### **Amendments**

Upon amendment of this Policy, changes will be communicated to all stakeholders.

### **Approved by Nadeem Tayar**

Managing Director

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