



Speak Up Whistleblower Policy

1. Purpose

Diabetes Australia is committed to acting ethically, lawfully and transparently. We encourage people to speak up if they become aware of wrongdoing. This policy explains:

- who can make a whistleblower disclosure
- what matters can be reported
- how to make a disclosure
- how we protect whistleblowers
- how disclosures are handled.

2. Scope

Applies to Diabetes Australia and all eligible whistleblowers, which means current or former:

- employees, officers, directors and senior managers
- contractors, consultants and suppliers
- volunteers, trainees and work experience participants
- members of Diabetes Australia
- relatives, dependants and spouses of the above, and any other person protected by whistleblower provisions under the Corporations Law or any other law.

Diabetes Australia is also open to receive complaints and concerns that do not constitute a whistleblower disclosure. This process will be approved by the Group CEO and made available publicly on www.diabetesaustralia.com.au.

3. Context

This policy supports compliance with the Corporations Law and has been developed considering ASIC's Regulatory Guide 270.

4. What can be reported

A whistleblower disclosure may be made if you have reasonable grounds to suspect information relates to:

- misconduct or an improper state of affairs
- fraud, corruption or financial misconduct
- misconduct relating to children or other vulnerable people
- breaches of law
- conduct that poses a danger to the public or the financial system
- serious breaches of Diabetes Australia policies.

Personal work-related grievances, such as workplace conflicts, are generally not protected, unless they involve victimisation, include an element of misconduct that is not a work grievance, or other circumstances covered by law. Please see your manager or People and Culture representative to discuss work-related grievances, which will be managed in accordance with any workplace grievance process.

5. Who disclosures can be made to

A disclosure can be made to an eligible recipient, including:

- the Whistleblower Protection Officer
- any director, officer or senior manager of Diabetes Australia
- an auditor of Diabetes Australia
- ASIC, ACNC or another regulatory authority prescribed by law
- in certain circumstances involving a public interest disclosure, to the National Anti-Corruption Commission, State equivalents, Members of Parliament or media as defined at law.

If a disclosure concerns:

- the Whistleblower Protection Officer it should be made to the Chief of Governance Legal & Risk
- the Chief of Governance Legal & Risk it should be made to the Group CEO
- the Group CEO it should be made to the Board Chair
- the Board Chair it should be made to Chair of the People & Culture Committee.

6. How to make a disclosure

Diabetes Australia encourages you to report to the Whistleblower Protection Officer at speakup@diabetesaustralia.com.au. You can also request a call-back to discuss by phone or in person.

Disclosures may be also be made to any eligible recipient:

- in writing or verbally
- anonymously, if preferred
- internally or externally.

You are encouraged, but not required, to provide enough information to allow the matter to be assessed and investigated.

Disclosures should be factual and made in good faith. Vexatious or malicious disclosures will not be tolerated and may result in disciplinary action.

7. Protection for whistleblowers

7.1 Confidentiality

Your identity will not be disclosed without your consent, except where legally permitted. Information will be handled securely and shared only on a strict need-to-know basis.

7.2 Protection from detriment

Diabetes Australia will not tolerate victimisation or retaliation and commits to proactively protecting an eligible whistleblower from harm arising out of a disclosure such as:

- dismissal or disciplinary action
- harassment, intimidation or discrimination
- damage to reputation
- any other disadvantage.

It is a duty of all employees to protect whistleblowers and others who cooperate in the investigation. Detrimental action against whistleblowers must be reported.

Reasonable management action carried out lawfully is not considered detriment.

7.3 Managing risk of detriment

Diabetes Australia commits to support whistleblowers, which may include:

- explaining the support services available, including the employee assistance program
- enabling a support contact independent from the investigation
- allowing workplace adjustments where appropriate, which may include permitting work from home arrangements, transfer to another role, modified reporting arrangements or other adjustments to support in management of mental stress.

7.4 Legal protections

Whistleblowers are protected from civil, criminal or administrative liability for making a protected disclosure.

Protections do not cover:

- an individual's liability for their own conduct as the immunity is for making the disclosure, not for the underlying conduct that is disclosed
- knowingly making a false or misleading statement.

A disclosure may amount to the exercise of a workplace right by an employee or contractor. In these circumstances, the organisation is prohibited from taking adverse action against employees or contractors where they exercised or proposed to exercise a workplace right(s).

7.4 Whistleblower Protection Officer

The Whistleblower Protection Officer safeguards whistleblowers by managing disclosures and confidentiality, observing the investigation process and acting as a crucial link between whistleblower and organisation to uphold protections against detriment and victimisation.

8. Handling and investigating disclosures

All disclosures will be:

- assessed promptly by the Chief of Governance Legal & Risk to determine if they are protected
- where appropriate, investigated either internally by the Internal Audit & Investigations Manager or externally as required and recommendations provided to the Group CEO or other determining role as relevant
- handled fairly, confidentially and in accordance with natural justice.

As applicable, matters may be referred to a regulator or law enforcement agency.

Whistleblowers will be informed of progress and outcomes of investigations where practicable.

The process flow is set out at Schedule A to this policy. The process is an operational matter that can be updated with Group CEO approval, provided steps remain consistent with this policy.

9. Fair treatment of people named in a disclosure

People named in a disclosure will be treated fairly and:

- informed of allegations where required by natural justice
- given an opportunity to respond
- supported throughout the process.

10. Lessons

Recommendations and lessons learned from investigations will be recorded and disseminated on a deidentified basis to the Executive Leadership Team and beyond as appropriate for the benefit of improvement throughout the organisation.

11. Communication and Awareness

This Policy will:

- be made available to all employees and officers on the Diabetes Australia intranet
- be made available publicly on www.diabetesaustralia.com.au
- form part of induction and training for employees and volunteers.

12. Definitions

Corporations Law	Means the Corporations Act (Cth) 2001 of the Commonwealth of Australia and includes any related regulations.
Detriment	Includes personal injury, prejudice to safety, property damage or loss, intimidation or harassment, adverse action, financial loss, damage to reputation, dismissal, workplace injury, alteration of an employee's position to their disadvantage and discrimination. Reasonable management and administrative action conducted in a reasonable manner by Diabetes Australia Group will not constitute detrimental conduct against a discloser or another person.
Diabetes Australia	Means Diabetes Australia Limited ABN 47 008 528 461 and its related bodies corporate.
Natural Justice	Also known as 'procedural fairness' means that any decision that may affect the rights, interests, or expectations of individuals in a direct or immediate manner is free from bias and that individuals are afforded a fair hearing and a reasonable opportunity to respond before an adverse decision is made that may affect their interests.
Whistleblower Protection Officer	Means the Compliance & Privacy Officer for Diabetes Australia.
Victimisation	A person making a threat to cause detriment or engaging in conduct against another person that causes or will cause a detriment. Under the Corporations Law victimisation is an offence.

Schedule A - Speak Up Process Flow

