

Whistleblower Protection Policy

dorsaVi Limited

ACN 129 742 409

Whistleblower Protection Policy

1. Introduction

dorsaVi Limited (dorsaVi or the Company) is committed to fostering a culture of compliance, honesty and ethical behaviour and encourages the disclosure of actual or suspected wrongdoing. dorsaVi recognises the importance of ensuring a safe, supportive and confidential environment where people feel confident about reporting wrongdoing and are supported and protected throughout the process. The dorsaVi board is ultimately responsible for this Whistleblower Protection Policy, as part of its broader risk management and corporate governance framework.

This Policy establishes the minimum requirements for:

- encouraging, supporting and promoting the appropriate raising of Reportable Conduct;
- ensuring dorsaVi has independent, confidential and objective reporting and investigation mechanisms so that people, acting honestly, ethically and with genuine concern are able to raise Reportable Conduct without fear of reprisal;
- ensuring that protections and protocols are in place to support people who raise Reportable Conduct;
- conducting fair, unbiased, evidence-based investigations in order to substantiate or refute claims of Reportable Conduct; and
- implementing a robust and trusted framework for escalating and addressing claims of Reportable Conduct.

Eligible Protected Persons means any current or former dorsaVi: officer; employee; supplier, contractor or consultant (including any of their employees) and any current or former relative, dependent or spouse of any of the above.

Reportable Conduct means an activity, conduct or state of affairs that has occurred, is currently occurring or is likely to occur and could be considered to be: illegal; unethical; improper; an activity that could or will lead to unsafe work practices, environmental or health risks; a breach of any legislation or internal policy, including the Code of Conduct; an intentional disclosure or misuse of commercially sensitive information; any other conduct, deliberate or otherwise, that may cause material financial or non-financial loss to dorsaVi or otherwise be materially detrimental to the interests of the Company.

Personal Work-Related Grievances. This Policy does not apply to **Personal Work-Related Grievances**. These are issues relating to employment, or former employment, or personal related issues, for example bullying, harassment, discrimination, or any industrial relations or human resources issue. However, if the issue does include a grievance about a matter that may have significant implications for dorsaVi or other individuals beyond an Eligible Protected Person personally, or a grievance relating to a detriment an Eligible Protected Person has suffered because they have made a report about Reportable Conduct; such grievances should be raised under this Policy.

2. Goals and Benefits

This Whistleblower Protection Policy aims to:

- (a) promote a culture of acting lawfully, ethically and responsibly;
- (b) clearly outline the type of misconduct that is encouraged to be reported;
- (c) empower Eligible Protected Persons to report suspected or actual Reportable Conduct confidentially, by providing a clear process that respects confidentiality and, if chosen, anonymity (subject to local laws and regulations);
- (d) outline the process for making and investigating reports;
- (e) prevent recrimination against any Eligible Protected Person because of a report made under this Policy.

3. Policy

3.1 WHAT TO REPORT

Eligible Protected Persons with reasonable grounds to suspect any Reportable Conduct are encouraged to make a report, providing all relevant information (eg name, nature of reportable conduct, dates, times how observed etc) where possible. Any **Personal Work-Related Grievance** (refer definition below) falls outside the scope of this Policy. These matters may also be discussed with the dorsaVi People & Culture business partner.

3.2 HOW TO REPORT

Eligible Protected Persons with reasonable grounds to suspect Reportable Conduct has occurred are encouraged to report that Reportable Conduct directly to:

- (a) any Executive Team member (dorsaVi encourages concerns be raised with any Executive Team member in the first instance); or
- (b) the Whistleblower Protection Officer (**Jenny Mate**);
(**Eligible Recipients**).

Upon receipt of the report, Eligible Recipients will:

- (a) do all things necessary to protect the confidentiality of the report, including ensuring any conversation takes place in private and any electronic and hard copy records of the report are kept secure;
- (b) ask whether the Eligible Protected Person agrees to allow the Eligible Recipient to disclose their identity (subject to local laws and regulations) and be further contacted as part of any investigation; and
- (c) promptly refer the Eligible Protected Person to the Whistleblower Protection Officer if the Eligible Protected Person does not wish to disclose their identity, so as to assist with reserving their anonymity; OR
- (d) promptly provide the report to the Company Secretary in full, if the Eligible Protected Person has agreed to disclose their identity and agrees to being contacted as part of any investigation.

3.3 WHEN TO REPORT

Eligible Protected Persons are encouraged to report Reportable Conduct as soon as they have reasonable grounds to suspect that the misconduct has taken place. It is never too late to make a report, as conduct that has taken place some time in the past could still have a significant impact.

3.4 WHISTLEBLOWER PROTECTION

(a) Confidentiality

dorsaVi will keep your report confidential and will only disclose information regarding your identity or information that could be likely to identify you in line with any consent provided by you or as otherwise permitted by law. You have a right to raise with dorsaVi any issue you experience as a result of making a report and request dorsaVi take positive action. All issues should be discussed directly with the Company Secretary to ensure your concerns are dealt with promptly. If you elected to remain anonymous, all issues should be discussed with the Whistleblower Protection Officer.

(b) Anonymity

To assist with the investigation, we encourage you to agree to disclose your identity to dorsaVi when making a report to an Eligible Recipient. However if you wish, subject to local laws and regulations in your country, you can elect to remain anonymous.

Your consent is required to be obtained, from the Eligible Recipient, before your identity (and any information that is likely to lead to your identity) maybe disclosed, unless otherwise permitted by law.

(c) Recrimination

dorsaVi is committed to respect and protect any Eligible Protected Person who makes a report in accordance with this Policy or who makes a protected external disclosure under relevant laws.

dorsaVi will not victimise, penalise or dismiss any person because of a report made in these circumstances. dorsaVi employees, officers, consultants and contractors must not victimise any person, or cause any person to be victimised, because of a report that has been made under this Policy. Victimisation includes intimidation, harassment, threats, coercion, action causing injury, loss or damage, discrimination, disadvantage, adverse treatment in relation to a person's employment, career, profession, trade or business. dorsaVi will regard any such victimisation very seriously and take appropriate action, which could include, in the case of employees, disciplinary action and dismissal.

If an Eligible Protected Person makes a report under this Policy that qualifies for protection under Australian laws:

- (a) that person is not subject to any civil, criminal or administrative liability or disciplinary action for making the disclosure; and
- (b) no contractual or other remedies or rights may be enforced or exercised against that person on the basis of the disclosure; and
- (c) the information in the report is not admissible into evidence against that person in criminal proceedings or in proceedings for the imposition of a penalty, unless the proceedings relate to the falsity of the information.

However, dorsaVi cannot provide immunity from any consequences where an Eligible Protected Person is personally implicated in the relevant misconduct.

3.5 INVESTIGATION

(a) Process

Eligible Recipients are required to directly provide the Company Secretary with any report they receive under this Policy, subject always to the anonymity and confidentiality requirements in section 3.4. Upon receipt of a report, either directly or through the dorsaVi Whistleblower Protection Officer, the Company Secretary, following consultation with the Chairman and Chair of the Audit and Risk Committee, will: (i) appoint an Investigating Officer to assess and, where appropriate, to investigate the report in a prompt manner; and (ii) notify the Eligible Protected Person of the findings of any investigation relating to the report, where appropriate.

As the investigation process is discreet, it might not be immediately evident in the workplace that action is being taken as a result of a report.

(b) Communication

The Company Secretary and the Investigating Officer will keep the Eligible Protected Person updated on the investigation, as appropriate. The board will also be kept up to date with the outcome of all investigations.

If a complaint is made about a Director of the board (other than the Chairman), then the Chairman is to oversee the investigation and if a complaint is made about the Chairman – then the Chair of the Audit and Risk Committee is to oversee this investigation.

4. Local Laws

This Policy must be read in conjunction with, and is subject to, local laws.

5. Training

From time to time, training maybe provided to dorsaVi officers and employees about this Policy, including employee rights and obligations under the Policy, ensuring confidentiality of Eligible Protected Persons' identity is safeguarded f they elect to remain anonymous and, for Eligible Recipients, how to respond to reports under this Policy.

6. Access to Policy

This Policy will be provided to all current staff and to new staff. It will also form a part of dorsaVi's Human Resource Policies and will be available from the Company's People & Culture business partner.

Approved by the board: 20 February 2020.