

Policy Category	ALL - All		
Best Care Goals	<input type="checkbox"/> Safe	<input type="checkbox"/> Personal	<input type="checkbox"/> Connected <input type="checkbox"/> Effective
Applies To	National		
Version	Approval Authority	Effective from	Review by date
2	General Counsel	6/10/2022	6/10/2025

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1. Policy Framework Statement

Silverchain is committed to a culture of compliance and ethical behaviour. This policy deals with issues relating to malpractice, misconduct, internal controls and conflicts of interest to ensure compliance with applicable laws and Silverchain's values. This policy complements the Code of Conduct and Conflicts of Interest Policy.

2. Purpose

The purpose of this Policy is to:

- encourage employees and certain other individuals to disclose any malpractice, misconduct, improper affairs or conflicts of interest of which they become aware;
- provide protection for employees and certain other individuals that disclose allegations of such malpractice, misconduct, improper affairs or conflicts of interest; and
- ensure that all allegations are thoroughly investigated and resolved with suitable action taken, where necessary.

3. Scope

This is a national policy and procedure which applies to all employees and those other individuals noted below.

4. Policy Principles

Silverchain will treat seriously and protect reports of improper conduct (**Protected Disclosures**) as described in this Policy and applicable legislation.

4.1. Who Can Make a Protected Disclosure?

Protected Disclosures can be made by 'eligible whistleblowers' only. An 'eligible whistleblower' is any of the following:

- a. any current or former officer of Silverchain;
- b. any current or former employee of Silverchain;
- c. any current or former contractor (including employees of contractors) of Silverchain; or
- d. any associate, related entity, or current or former relative or dependent (which includes a spouse or former spouse) of any of (a) – (c) above,

(each being an **Eligible Whistleblower**)

4.2. What Improper Conduct is Reportable Conduct?

Eligible Whistleblowers can make a Protected Disclosure under this policy if they have reasonable grounds to suspect a Silverchain director, officer, employee, contractor, supplier, tenderer or other person that has business dealings with Silverchain has engaged in conduct (**Reportable Conduct**) that:

- is dishonest, fraudulent or corrupt, including bribery or other activity in breach of the Silverchain Anti-Bribery Policy;
- is illegal activity (such as theft, violence, harassment or intimidation or other breaches of state or federal law);
- is unethical or in breach of Silverchain's policies (such as dishonestly accessing or altering records or data, adopting questionable accounting practices or wilfully breaching Silverchain's Code of Conduct or other policies);
- is potentially damaging to Silverchain, a Silverchain employee or a third party (such as unsafe work practices, environmental damage, health risks or abuse of Silverchain's clients, property or resources);
- may cause financial loss to Silverchain or damage its reputation or otherwise be detrimental to Silverchain's interests;
- involves harassment, discrimination, victimisation or bullying, other than Personal Work- Related Grievances (as defined in this Policy); or
- involves any other kind of misconduct or an improper state of affairs or circumstances.

Note that Reportable Conduct may include conduct that does not involve a contravention of any particular law.

Examples of matters that would constitute Reportable Conduct include:

- knowingly approving fraudulent invoices for payment by Silverchain;
- inappropriate behaviour towards or in the presence of Silverchain's clients;
- inappropriately using Silverchain's property, including medical consumables, stationery, office equipment, vehicles, fuel, or intellectual property; and
- systemic non-compliance with or circumventing Silverchain's policies in circumstances that could cause damage to Silverchain, its employees, its clients, other third parties, or the environment.

4.3. What is not Reportable Conduct?

Examples of matters that would not constitute Reportable Conduct include:

- Personal Work-Related Grievances (as defined in this Policy);
- a failure to meet performance expectations;
- a failure to comply with Silverchain's policies through ignorance; and

- isolated behavioural incidents that are being addressed by line-managers through ordinary management processes.

4.4. Who Can a Protected Disclosure Be Made To?

Eligible Whistleblowers may make a Protected Disclosure under this Policy of any conduct or behaviour they believe may be Reportable Conduct in the following ways:

- a. by an email to one of the following people via one of two email addresses listed below;
- b. by phone or online via an independent third party whistleblowing service;
- c. directly to ASIC or AHPRA; or
- d. to a lawyer for the purposes of obtaining advice or representation in relation to the whistleblower provisions. This disclosure will be protected even where the lawyer concludes that a potential disclosure does not relate to Reportable Conduct

By Email

An email can be sent to one of the following people or committees via governance@silverchain.org.au, or to the Silverchain's Chief Executive Officer at ceo@silverchain.org.au.

- Chairperson, Board Audit and Risk Management Committee;
- Director, People and Culture;
- Group Manager, HR Services;
- Silverchain's auditor or a member of that audit team;
- General Counsel and/or Company Secretary; and/or
- Chief Executive Officer.

Online or by phone via third party whistleblowing service

Instructions on how to make a Protected Disclosure via the third party independent whistleblowing service can be found in Appendix A to this Policy.

4.5. What Form Should a Protected Disclosure Take?

Eligible Whistleblowers can make their Protected Disclosure in whatever form they feel most comfortable. This may be verbally, in writing by post or by email, or any other form provided it is clearly marked confidential and addressed to at least one of the roles listed above.

Eligible Whistleblowers should include in their Protected Disclosure specific, adequate and pertinent information with respect to dates, places, witnesses, amounts and other relevant information to allow for a reasonable investigation to be conducted.

Protected Disclosures can be made anonymously. Protected Disclosures can be made during or outside of ordinary workplace hours.

4.6. Silverchain's Investigation of Reportable Conduct

Silverchain will investigate all matters disclosed under this policy as soon as is practicable in the circumstances and fairly with due regard for the nature of the allegations and the rights of the individuals involved.

Silverchain may arrange for a suitably qualified, independent, and impartial investigation (which may be internal or external to Silverchain as the circumstances require) to examine the matter. The investigator will provide a report to the following people, who will make a joint recommendation to the CEO on what action needs to be taken:

- Director, People and Culture
- Group Manager, HR Services
- General Counsel and/or Company Secretary

Note that where the disclosure relates to either the CEO or any of the people listed above, the recommendations will be provided to the Chairperson of the Board. The CEO (or the Chairperson of the Board where applicable) will ultimately approve the appropriate action.

Where the Reportable Conduct is reasonably suspected to include criminal activity, Silverchain will refer the disclosure to the appropriate authorities.

4.7. Protection of Whistleblowers

Silverchain is committed to ensuring confidentiality in respect of all matters raised under this policy and that those that make a Protected Disclosure are treated fairly and do not suffer detriment.

a. Protection against detrimental conduct

Detrimental treatment includes dismissal, demotion, harassment, discrimination, disciplinary action, bias, threats or other unfavourable treatment connected with making a Protected Disclosure.

If an Eligible Whistleblower is subject to detrimental treatment as a result of making a Protected Disclosure under this policy, they should inform one of the individuals authorised to receive Protected Disclosures (listed above) under this policy.

An Eligible Whistleblower that suffers detriment as a result of making a Protected Disclosure under this policy may be entitled to seek compensation and/or other remedies through the court system. Eligible Whistleblowers that believe they may be entitled to compensation or another remedy through the court system should seek independent legal advice.

b. Protection of identity and confidentiality

Subject to compliance with legal requirements, upon receiving a Protected Disclosure under this policy Silverchain will make every reasonable effort to protect the Eligible Whistleblower's identity.

Silverchain may share the identity of a whistleblower or information likely to reveal an Eligible Whistleblower's identity if:

- they consent;
- the concern is reported to the ASIC, the AHPRA, the Tax Commissioner or the Australian Federal Police;
- the concern is raised with a lawyer for the purpose of obtaining legal advice or representation.

If Silverchain needs to investigate a Protected Disclosure, it may disclose information that could lead to a whistleblower's identification, but it will take reasonable steps to reduce the risk of this occurring.

Any disclosure of the identity (or information likely to reveal the identity) of a whistleblower will be made on a strictly confidential basis.

c. Protection of files and records

All files and records created from an investigation under this policy will be retained securely.

Unauthorised release of information to someone not involved in the investigation (other than senior managers or directors that need to know to take appropriate action or for corporate governance purposes) without the Eligible Whistleblower's consent will be a breach of this policy.

Whistleblowers are assured that a release of information in breach of this policy will be regarded as a serious matter and will be dealt with under Silverchain disciplinary procedures.

The Corporations Act and the Taxation Administration Act also give special protections to disclosures provided certain conditions are met. The General Counsel and/or Company Secretary can provide further information on these special protections if requested.

d. Protection where disclosure later found to be benign

No action will be taken against any whistleblower that, in good faith and in accordance with this policy, makes a Protected Disclosure about conduct that is later found by an investigation to not constitute Reportable Conduct.

All Eligible Whistleblowers that make a disclosure under this policy should have reasonable grounds for believing the information they are disclosing indicates unethical or unlawful conduct. Any disclosures that constitute a Personal Work-Related Grievance (as defined in this policy) or are otherwise made maliciously or were knowingly false will not be treated as acting in good faith, will be viewed as serious, and may result in disciplinary action up to and including dismissal.

An Eligible Whistleblower may seek legal advice prior to making disclosure, for any reason, including to determine whether they are eligible for protection under this policy and the law.

5. Supporting Documents

Silver Chain Group documents that directly relate to and inform this Policy are available with this document in the Policy Document Management System (PDMS).

Other documents that directly relate to and inform this Policy are as follows:

Corporations Act 2001 (Cth)

Taxation Administration Act 1953 (Cth)

ASIC Information Sheet 238 – Whistleblower rights and protections

ASIC Information Sheet 239 – How ASIC handles whistleblower reports

ASIC RG 270 – Whistleblower policies

AHPRA Policy

6. Definitions and Acronyms

The following definitions and acronyms apply for the purpose of this Policy:

AHPRA	Means the Australian Health Practitioner Regulation Agency.
ASIC	Means the Australian Securities and Investments Commission.
Board	Means the board of directors of Silver Chain Group Limited.
Corporations Act	Means the <i>Corporations Act 2001 (Cth)</i> .
Eligible Whistleblower	<p>Is an individual that is eligible for protection under this policy and must be in relation to a Silver Chain Group Entity any of the following:</p> <ul style="list-style-type: none"> a. any current or former officer of Silverchain; b. any current or former employee of Silverchain; c. any current or former contractor (including employees of contractors) of Silverchain; d. any associate, related entity, or current or former relative or dependent (which includes a spouse or former spouse) of any of (a) – (c) above.
Personal Work-Related Grievance	<p>Is any matter that:</p> <ul style="list-style-type: none"> a. employment, having (or tending to have) implications for the discloser personally; and b. includes information that: c. does not have significant implications for Silverchain, or another company related to Silverchain, that do not relate to the discloser; and d. does not concern Reportable Conduct, however, will not include any matter where: the disclosure concerns alleged victimisation of the whistleblower. This means situations where the whistleblower suffers a detriment, or is threatened with a detriment, by another person due to the fact that other person believes the whistleblower has made, or may make Protected Disclosure; the disclosure has significant implications extending beyond the whistleblower; or e. the disclosure is made to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions. <p>Examples of Personal Work-Related Grievances include:</p>

	<ul style="list-style-type: none"> a. an interpersonal conflict between the whistleblower and another employee; b. a decision relating to the engagement, transfer or promotion of the whistleblower. c. a decision relating to the terms and conditions of engagement of the discloser; and d. a decision to suspend or terminate the engagement of the whistleblower, or otherwise to discipline the discloser.
Silverchain	Means Silver Chain Group Limited and each of its related bodies corporate and a Silver Chain Group Entity means any of them
Taxation Administration Act	Means the <i>Taxation Administration Act 1953 (Cth)</i> .

7. Document Details

Document Owner	Senior Legal Counsel
Consumer Participation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not Applicable
Document Type	POL - Policy
Functional Area	Governance, Strategy and Performance
Periodic Review	36 months

Silver Chain Group’s policies align with relevant legislation and standards and are based on providing a fair, inclusive and safe working environment free from bullying and discrimination and one that enables equal opportunity for all Silver Chain staff. Our policies embody our values of Integrity, Respect, Trust and Compassion.

Appendix A - Whistleblower Online and Phone Request Instructions

How do I make an Online Report?

Make An Online Report

- i. Click on the 'Make an Online Report' button below once items ii. – iv. below are noted.
- ii. You will be redirected to the new page where you need to enter '**SILVER2020**' in the 'Unique Key' field.
- iii. Click on 'next' and follow the prompt.
- iv. You will then be asked for the 'Client Reference Number' which is '**4beih2020**'.

How do I make a Phone Report?

Make A Phone Report

- i. Call Australia – 1300 687 927 – 24 hours.
- ii. To validate your report when requested you will be asked for the 'Unique Key', please state
- iii. "**SILVER2020**".
- iv. The support person will then ask you for your 'Client Reference Number' which is "**4beih2020**"