



QP6-37

Confidential Reporting (Whistleblowing) Procedure



1. Purpose

Anchor Foods is committed to the highest possible standards of openness, honesty and accountability. In line with that commitment, we expect anyone who has serious concerns about any aspect of the work within Anchor Foods relating to product safety, integrity, quality & legality to come forward and inform Senior Management (Manager / Supervisor / HR) of those concerns. This procedure provides a confidential procedure through which such concerns can be reported and investigated.

2. Scope

This Confidential Reporting Procedure applies to all members of staff, and those contractors working for Anchor Foods. It also covers suppliers and those providing services under a contract with Anchor Foods on their own premises. Within this procedure the phrase 'members of staff' includes all of the above. This procedure does not cover complaints relating to: Staff concerns relating to their employment or the way they are treated at work (including complaints regarding discrimination harassment etc.) - this is covered in the Anchor Foods Grievance Procedure (QP6-28).

3. Principles

Members of staff are often the first to be aware that there may be something seriously wrong within an Organisation. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to Anchor Foods. They may also fear harassment or victimisation. In these circumstances it may be easier to ignore the concern rather than report any suspicions. This procedure makes it clear that individuals can raise concerns without fear of victimisation, subsequent discrimination or disadvantage. This procedure is intended to encourage and enable individuals to raise serious concerns within Anchor Foods rather than overlooking a problem or 'blowing the whistle' outside.

4. Aims

This procedure aims to:

- encourage individuals to raise serious concerns and to question and act upon concerns about practice;
- provide procedures to raise those concerns;
- ensure that individuals receive a response to their concerns and that they are aware of how to pursue them if they are not satisfied, and
- where they have a reasonable belief that they have made a disclosure in good faith.

This procedure is intended to cover major concerns about malpractice relating to product safety, integrity, quality & legality that fall outside the scope of other procedures. In order for a disclosure to be a qualifying disclosure, it must be disclosure of information, which shows one or more of the following:

- that a criminal offence has been, is being, or is likely to be committed;
- that a person has failed, is failing or is likely to fail to comply with any legal obligation;
- that a miscarriage of justice has occurred, is occurring, or is likely to occur;
- that the health and safety of any member of staff has been, is being, or is likely to be endangered;
- that the environment has been, is being, or is likely to be damaged;



QP6-37 Confidential Reporting (Whistleblowing) Procedure



- that information tending to show any matter falling within any one of the preceding matters has been, is being, or is likely to be deliberately concealed.

However, this procedure also includes other areas of serious concern such as the unauthorised use of funds, fraud and corruption, or other serious breaches of the Anchor Foods Code of Conduct.

Any serious concerns that members of staff have about any aspect of service provision or the conduct of members of Anchor Foods or others acting on Anchor Foods's behalf can be reported under this procedure. This may be about something that:

- makes individuals feel uncomfortable in terms of known standards, experience or the standards they believe Anchor Foods subscribes to;
- or is against Anchor Foods's policies;
- or falls below established standards of practice;
- or amounts to improper conduct.

Examples of areas which would be covered by whistleblowing could be:

- a. Fraud e.g. by someone whose work includes dealing with invoices etc;
- b. Accepting inducements from potential contractors to award a contract to them;
- c. Theft of Anchor Foods property, particularly the unauthorized removal of records from site; and
- d. Improper use of information held by Anchor Foods.

5. 5. Safeguards

Anchor Foods recognises that the decision to report a concern can be a difficult one to make. This procedure is designed to offer protection to individuals who disclose concerns, provided the member of staff makes the disclosure:

- in good faith;
- and in the reasonable belief that malpractice is involved.

Anchor Foods will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect any member of staff who raises a concern in good faith.

Any investigation into allegations of potential malpractice will not influence or be influenced by any disciplinary or redundancy procedures that already affect a member of staff making a disclosure.

6. Confidentiality

Anchor Foods will treat all such disclosures in a confidential and sensitive manner. The identity of the member of staff making the allegation will be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the member of staff making the disclosure may need to provide a statement or come forward as a witness as part of the evidence required. If this is the case the member of staff will be consulted.



QP6-37

Confidential Reporting (Whistleblowing) Procedure



7. Anonymous Allegations

Individuals are encouraged to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, and more difficult to investigate fully,

- In exercising this discretion, the factors to be taken into account would include:
- the seriousness of the issues raised;
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable sources.

8. Untrue Allegations

If a member of staff makes an allegation in good faith, which is not confirmed by the investigation, no action will be taken against that individual. In making a disclosure, the member of staff should exercise their duty of care to ensure the accuracy of the information. If, however, a member of staff has made frivolous, malicious or vexatious allegations, or allegations for personal gain, disciplinary action may be taken against that particular individual.

9. Advice

Confidential guidance on how to pursue matters of concern may be obtained from:

- Human Resources;
- Your trade union representative.

10. The Whistleblowing Procedure

The CEO of Anchor Foods is responsible for overall supervision of the Whistleblowing procedure. Staff may raise individual concerns either to the CEO or their Manager / Supervisor. They are supported in their role by the General Manager / HR. If you are concerned about matters which are covered by the scope of this procedure you should contact the General Manager / HR, who will bring the matter to the attention of the CEO, in accordance with your wishes.

The earlier a concern is raised, the easier it is to take action. Concerns may be raised verbally or in writing. Staff who wish to make a written report should use the following format:

- the background and history of the concern (giving relevant dates);
- the reason why they are particularly concerned about the situation.

The confidential email address is Whistleblowing@anchorfoods.com.au.

Although individuals are not expected to prove beyond doubt the truth of an allegation, they will need to demonstrate that there are reasonable grounds for their concern to be acted upon.

10.1 Investigation

In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Any internal investigation should be dealt with within 30 working days.



QP6-37 Confidential Reporting (Whistleblowing) Procedure



Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required this will be taken before any investigation is conducted.

The CEO, as appropriate, will decide on the form of investigation to be undertaken and to whom the investigation should be delegated. Where relevant, the matters raised may:

- be investigated by management or through the Anchor Foods Disciplinary Procedure (QP6-04);
- be referred to the police;
- be referred to the appropriate external auditor;
- form the subject of an independent inquiry.

The CEO will be informed of all suspected frauds and irregularities from the outset of any investigation that might be undertaken.

Within 10 working days of a concern being raised, the General Manager / HR will write to the individual:

- Acknowledging that the concern has been received;
- Indicating how the matter will be progressed;
- Giving an estimate of how long it will take to provide a final response.
- Informing whether any initial enquiries have been made; and
- Stating whether further investigations will take place and if not, why not.

The amount of contact between those considering the issues and the member of staff will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, the General Manager / HR and will seek further information from the individual. Where any meeting is arranged, off-site if necessary, the member of staff may be accompanied by their trade union representative or a work colleague if they wish.

Anchor Foods will take steps to minimise any difficulties which individuals may experience as a result of raising a concern. For instance, if a member of staff is required to give evidence in criminal or disciplinary proceedings Anchor Foods will arrange for them to receive any necessary support and advice about the procedure.

Anchor Foods accepts that the member of staff needs to be assured that the matter has been properly addressed. Thus, subject to legal constraints, the General Manager/ HR will inform the member of staff of the outcome of any investigation.

10.2 Monitoring

The CEO has overall responsibility for the maintenance and operation of this procedure. He/she will ensure that a record is kept of concerns raised and the outcomes (but in a form which does not endanger confidentiality).



QP6-37 Confidential Reporting (Whistleblowing) Procedure



11. Taking the Matter Further

Anchor Foods hopes members of staff will be satisfied with any action taken. If, having raised concerns in accordance with this procedure, the complainant is unhappy with the response received they can take the matter further by discussing their concerns 'in confidence' with the CEO.