Wesley Mission External Whistleblower Policy

1. Purpose

Wesley Mission is committed to fostering a culture of ethical conduct and maintaining high standards of governance.

The purpose of this Policy is to outline the process for reporting conduct captured by it and that may constitute misconduct or an improper state of affairs under Legislation, and to explain how Wesley Mission will protect and support you to raise such concerns.

This Policy is published on Wesley Mission's website to ensure it is accessible for external individuals, such as former employees and service providers. Internal employees should refer to the Policy published on the Wesley Mission intranet.

All data, including personal information, provided to Wesley Mission as part of a Report, is stored in accordance with Wesley Mission's Privacy Policy.

Defined terms used in this Policy are set out in section 10 below.

2. Who the Policy applies to

This Policy applies to an individual who is, or has been, any of the following in relation to Wesley Mission (or an associate of it):

(a) a former officer or director;

(b) former employee (including permanent, temporary, casual, part-time or full-time);

(c) secondee, intern or volunteer (if they do not have access to Wesley Mission's intranet);

(d) supplier of goods or services (including the employees of the supplier); or

(e) a relative, dependant or spouse of an individual referred to in paragraphs (a) to (d),

(each, an **Eligible Whistleblower**).

A separate regime and policy applies to individuals who make a disclosure about compliance with the *Aged Care Act 2024* (Cth) **(Aged Care Act).** If your concern relates to the Aged Care Act, relevant information is provided in the Wesley Home Care Whistleblower Protection Policy published on the Wesley Mission website.

3. Matters the Policy applies to

3.1. What matters can be protected under this Policy?

Your Report can be protected under this Policy if you have reasonable grounds to suspect that the information in the Report concerns misconduct or an improper state of affairs under the Legislation, in relation to Wesley Mission, or an officer or employee of Wesley Mission, including the conduct set out below:

(a) illegal conduct, such as theft, dealing in or use of illicit drugs, violence or threatened violence, and criminal damage against property or any other offence punishable by imprisonment of 12 months or more;

(b) fraud, money laundering or misappropriation of funds;

(c) offering or accepting a bribe;

(d) a systemic issue that the relevant regulator should know about to properly perform its functions;

(e) conduct that represents a danger to the public or financial system; or

(f) engaging in or threatening to engage in Detrimental Conduct against a person who has made a Report under this Policy, or is believed or suspected to have made, or be planning to make a Report under this Policy,

(**Disclosable Matters**).

If you are considering making a Report and would like to understand how this Policy operates or how a Report may be handled, you may contact whistleblower@wesleymission.org.au or Wesley Mission Whistleblower Hotline number 1800 592 272, to obtain information. You may do this without making a disclosure.

3.2. What is not covered by this Policy?

This Policy will not protect or apply to a Report related to your current or former employment, unless that concern also relates to a Disclosable Matter. For example, concerns related only to the following are not covered by this Policy:

(a) an interpersonal conflict;

(b) complaint about a performance or reward review outcome;

(c) grievance about a recruitment decision including engagement, transfer or promotion;

(d) complaint about disciplinary action taken or proposed to be taken; or

(e) decision regarding terms and conditions of employment,

(**Personal Work-Related Grievance**).

A Personal Work-Related Grievance may still qualify for protection under this Policy if it includes information about Disclosable Matters (i.e. a mixed report). Reports that are not about Disclosable Matters do not qualify for protection under this Policy or the *Corporations Act 2001* (Cth).

4. How to make a Report

You can make a Report about Disclosable Matters via one of the following channels:

4.1. Third-Party Whistleblower Service

You can make a Report to a third-party service, Your Call Whistleblowing Services **(Your Call),** which operates independently of Wesley Mission to receive (but not investigate reports).

You can make a Report to Your Call:

(a) Online (24/7): www.yourcall.com.au/wesleymission

(b) by phone using Your Call's external reporting hotline: 1300 790 228 **(7am to midnight AEST on business days)**

4.2. Wesley Mission General Phone & Email

You can make a Report to Wesley Mission directly:

(a) by phone: 1800 592 272

(b) by email at whistleblower@wesleymission.org.au

The above phone and email are monitored by the Risk and Compliance Manager and/or the Head of Risk **9 am to 5 pm during Business Days**. If your Report is about the Risk and Compliance Manager or Head of Risk, it may be made to an alternative channel outlined in this Section 4.

4.3. Other Wesley Mission recipients

You may make a Report to other recipients under this Policy including:

(a) an external auditor of Wesley Mission;

(b) Wesley Mission's appointed Actuary;

(c) A Senior Manager - being a direct report to the CEO or a member of Community Services Leadership Team (**CSLT**); or

(d) a Director of the Board.

4.4. Other external channels

The Legislation provides other external channels that Reports may be made to. These are outlined at **Attachment 1**.

4.5. Anonymous Reports

You may choose to remain anonymous when making a Report, over the course of any investigation, and after the investigation is finalised. For example, this can be done by using Your Call, or by using an anonymised email address or pseudonym.

Wesley Mission will take all reasonably practicable steps to maintain anonymity where necessary, however anonymity protections may limit the ability to fully investigate the matter or communicate with you about it. If you have provided your name as part of making your Report, Wesley Mission will not reveal your identity without first obtaining your consent, unless disclosure is required or permitted by law.

4.6. False Reports

Protections still apply if your Report turns out to be incorrect provided it is made on reasonable grounds. However, if you make a Report you know to be untrue (e.g. if you make a report to harm someone else) you will not be protected by this Policy.

5. How a Report will be assessed

5.1. How will my Report be assessed?

When a Report is made under this Policy, the Eligible Recipient who receives it will notify the Risk Manager. They will not reveal your identity, unless you have agreed.

The Risk Manager will convene the Whistleblower Committee which may be comprised of all or some of following persons depending on the nature or complexity of the matters raised:

(a) Executive Director, Governance, Legal & Risk;

(b) Executive Director, Finance, Property & Residential Villages;

(c) Executive General Manager, People & Culture;

(d) Legal Counsel; and

(e) Risk & Compliance Manager (as Secretary of the Whistleblower Committee).

The Whistleblower Committee will among other things:

(a) assess if your Report is a Protected Disclosure under this Policy;

(b) if required, seek further information to better understand the issue;

(c) assess the risk of any Detrimental Conduct against you; and

(d) appoint a Whistleblower Support Manager; and

(e) appoint an investigator if required.

5.2. When will a Report be a Protected Disclosure?

A Protected Disclosure is a Report protected under this Policy, on the basis that:

(a) the Report is made by an Eligible Whistleblower;

(b) the Report is made to an Eligible Recipient; and

(c) the allegations in the Report are a Disclosable Matter.

5.3. If your Report is assessed as a Protected Disclosure

The Eligible Recipient will notify you if your Report has been assessed as a Protected Disclosure and who your Whistleblower Support Manager is proposed to be.

5.4. If your Report is not assessed as a Protected Disclosure

If your Report is not assessed as a Protected Disclosure, the Eligible Recipient will notify you of the reason for this assessment and other ways to report the issue if appropriate.

6. Investigation Process

The Whistleblower Committee may appoint a Whistleblower Investigator to investigate a Protected Disclosure.

The Whistleblower Investigator will promptly investigate the matters raised. The objective of the investigation is to determine whether there is enough evidence to substantiate or refute the matters reported.

The investigation process, including its expected timeframe may vary depending on the nature of, and information provided within, the Protected Disclosure and the ability to contact you.

If you can be contacted, you will be kept informed of the investigation process by the Whistleblower Support Manager. The regularity of the updates will depend on the nature of the Protected Disclosure and surrounding circumstances.

At any point during the investigation, you may contact the Whistleblower Support Manager for an update or to raise a query about the investigation process.

During the investigation and where it is reasonably necessary for the purposes of the investigation, Wesley Mission may need to disclose information which has the potential to identify you. This will only occur where reasonable steps have been taken to protect your identity and notify you of the disclosure.

The findings of an investigation will be documented in a report that outlines the steps taken, the information considered and the outcome of the investigation.

The Whistleblower Committee will consider the investigation report and determine whether there are any required actions.

You will usually be informed of the outcome of the investigation, subject to any confidentiality restraints. Generally, it is not appropriate to provide the details of the outcome, the investigation and/or any investigation report.

7. Protections for Disclosers

If you are a Discloser under this Policy, you will be protected from any actual or threatened negative treatment as a result of making a Protected Disclosure, including:

(a) Discrimination, harassment and intimidation;

(b) Damage to your property, reputation, business or financial position;

(c) Physical or psychological harm; or

(d) Threats to do any of these things,

(**Detrimental Conduct**).

If you feel that you are being victimised as a result of making a Protected Disclosure, you should raise this issue with your Whistleblower Support Manager.

If a Report substantially relates to a person that might otherwise be involved in the processes described above, Wesley Mission will, to the extent appropriate, take all reasonably practicable steps to exclude that person from those processes and/or notification of the concern.

Additional protections may apply under Legislation. These are outlined in **Attachment 1**.

8. How a person who makes a Report will be supported

8.1. How will a person who makes a Report be supported

Wesley Mission will take reasonable steps to support a person who makes a Report including by:

(a) Assessing each Report, Protected Disclosure and determining whether an investigation is appropriate;

(b) Where an investigation is undertaken, ensuring the process is objective, fair and independent;

(c) Limiting access to the identity of a person who makes a Report and disclosure details to personnel necessary to consider the Report including the Whistleblower Committee, Whistleblower Support Manager and any Whistleblower Investigator;

(d) Handling all Reports confidentially regardless of whether the person that made the Report consents to identification;

(e) Removing or redacting personal identifiers from all documents and communications;

(f) Ensuring all related documents are stored securely and only accessed by authorised individuals; and

(g) Taking appropriate action to protect a person who makes a Report from Detrimental Conduct.

8.2. How will individuals mentioned in a Protected Disclosure be supported?

A person who is mentioned in a Protected Disclosure will be provided with procedural fairness, confidential handling, and an objective investigation before any adverse findings of fact are made in an investigation.

9. Governance

This Policy is published on Wesley Mission's website.

Wesley Mission may share a specific issue or insight from a Protected Disclosure while maintaining confidentiality with the MD, Wesley Community Services; CEO; Board; and other relevant audience for the purposes of ensuring continuous improvement to processes, procedures and culture

10.Definitions

Term	Definition
Board	The Board of Directors of Wesley Mission
Business Day	means a day other than a Saturday, Sunday or public holiday in New South Wales.
Detrimental Conduct	has the meaning set out in section 7 of this Policy.
Eligible Recipient	means the recipients set out in section 4 of this Policy.
Eligible Whistleblower	means an individual set out in sections 2 of this Policy.
Disclosable Matters	means the matters set out in section 3.1 of this Policy.
Discloser	means an individual who makes a report which is deemed a Protected Disclosure, as defined in the Definitions.
Legislation	The *Corporations Act 2001* (Cth) or *Taxation Administration Act 1953* (Cth), as applicable in the circumstances.
Personal Work-Related Grievance	has the meaning set out in section 3.2 of this Policy.
Policy	means this Wesley Mission External Whistleblower Policy.
Protected Disclosure	means a Report which will be protected under this Policy, on the basis that: • the Report is made by an Eligible Whistleblower; • the Report is made to an Eligible Recipient; and • the allegations in the Report are Disclosable Matters.

Report	means a report made to an Eligible Recipient but not yet assessed as a Protected Disclosure.
Senior Manager	has the meaning given to it in the *Corporations Act 2001* (Cth).
Whistleblower Committee	is comprised of some or all the persons set out in section 5.1 of this Policy and may be convened for the purposes set out in that section.
Whistleblower Investigator	means an independent and suitably qualified person (which may be an employee of Wesley Mission or an external investigation firm) appointed by the Whistleblower Committee to investigate the Protected Disclosure.
Whistleblower Support Manager	means the person appointed by the Whistleblower Committee to act as the primary contact for a Discloser.

11. Responsibility and policy owner

The owner of this policy is the Executive Director, Governance, Legal and Risk.

The owner is responsible for implementing the policy and achieving the desired outcomes.

12. Consultation and approval

This policy has been developed in consultation with Risk and Assurance Forum and the Legal and Risk team.

The policy has been approved by the Executive Director, Governance, Legal and Risk.

Date Approved: 11/11/2026

Attachment 1: Protections under the Legislation

Application of the Legislation

Attachment 1 is intended for information purposes only and should not be taken as the provision of legal advice in respect of the operation and application of the whistleblower regime under the Corporations Act 2001 (Cth) **(Corporations Act)** and Taxation Administration Act 1953 (Cth) **(Taxation Act)** (together the **Legislation**).

Whistleblowing information is published by ASIC, APRA and the ATO, such as:

(a) ASIC Information sheet 238 Whistleblower rights and protections;

(b) ASIC Information sheet 239 How ASIC handles whistleblower reports (**INFO 239**),

(**ASIC Information**).

Attachment 1 sets out a summary of the protections that may be available under the Legislation. If you require information on the application of the Legislation, please seek independent legal advice.

Legislation

You will be eligible for protections under the Legislation if:

(a) you are an Eligible Whistleblower;

(b) your disclosure is about a Disclosable Matter; and

(c) you make your disclosure to one of the following:

(i) any Eligible Recipient set out in section 4 of this Policy;

(ii) any other eligible recipient under the Corporations Act, including legal practitioner (for the purposes of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions in the Corporations Act) or ASIC, APRA another Commonwealth body prescribed by regulation (see ASIC Information for more information on this); or

(iii) any other eligible recipient under the Taxation Act, including the Tax Practitioners Board, Commissioner of Taxation, a registered tax agent or BAS agent who provides tax agent services to Wesley Mission, or an auditor or member of the audit team conducting an audit of Wesley Mission.

Public interest and emergency disclosures

In limited circumstances, a disclosure may be made to a journalist or member of a federal, state or territory Parliament.

It is important you understand the criteria for making a public interest or emergency disclosure under the Corporations Act and you should obtain independent legal advice prior to making this type of report.

You must have previously disclosed the information to ASIC, APRA or a prescribed body and notified that body that they intend to make a public interest or emergency disclosure. In the case of a public interest disclosure, at least 90 days must have passed since you disclosed the information to ASIC, APRA or a prescribed body.

Compensation and other remedies

If you make a disclosure that qualifies for protection under the Corporations Act, you (or any other employee or person) may be able to seek compensation and other remedies through the courts if:

(a) you (or any other employee or person) suffer loss, damage or injury because of a disclosure; and

(b) Wesley Mission failed to take reasonable precautions and exercise due diligence to prevent the Detrimental Conduct.

You are encouraged to seek independent legal advice in relation to this remedy.

Legislative Protections

Where you make a disclosure that qualifies for protection under the Legislation, the protections are as follows:

(a) anyone who engages in Detrimental Conduct may be guilty of an offence and may be liable for damages.

(b) a person cannot disclose your identity or information that is likely to lead to the identification of your identity unless one of the following exceptions apply:

(i) you consent to the disclosure of your identity;
(ii) the disclosure of details likely to lead to your identification is reasonably necessary for the effective investigation of the matter and all reasonable steps are taken to reduce the risk of your identification;
(iii) the concern is reported to authorised bodies including ASIC, APRA, the AFP, the Commissioner of Taxation or a person or body prescribed by Legislation or regulation; or
(iv) the concern is raised with a legal practitioner for the purpose of obtaining legal advice or representation.

(c) civil liability (for instance, legal action against you for breach of an employment contract, duty of confidentiality or another contractual obligation).

(d) criminal liability (for instance, the attempted prosecution of you for unlawfully releasing information, or other use of the disclosure against you in a prosecution, other than making a false disclosure).

(e) administrative liability (for instance, disciplinary action for making the disclosure).

The protections do not grant immunity for any misconduct you have engaged in that is revealed in your disclosure.