



Whistleblower Policy

1. Purpose and Scope

Recfishwest is committed to maintaining a high standard of corporate governance through a culture of strong ethical behaviour and corporate compliance. Employees and volunteers must fulfil their roles and responsibilities with honesty and integrity.

The objective of this Whistleblower Policy is to encourage employees, suppliers, contractors, tenderers or any person who has business dealings with Recfishwest to raise any concerns and report any instances of unethical, illegal, fraudulent or undesirable conduct where there are reasonable grounds to suspect such conduct has occurred.

Recfishwest will provide a secure mechanism to allow individuals to report conduct in the knowledge they can act without fear of intimidation, disadvantage or reprisal.

2. What is Reportable Conduct

This Policy seeks to encourage individuals to report any issues that they believe should be reported.

Conduct covered by this Policy includes any conduct of a Recfishwest director, officer, employee, volunteer, contractor, or any other person who has business dealings with Recfishwest – in the context of their dealings with Recfishwest – whether actual or suspected, which an individual honestly believes on reasonable grounds:

- Is dishonest, fraudulent or corrupt or involves bribery or corruption or otherwise amounts to an abuse of authority;
- Is illegal, such as theft, drug sale or use, violence, harassment or intimidation, criminal damage to property or other breaches of state or federal law;
- Is unethical or in breach of Recfishwest policies such as dishonestly altering company records or data, adopting questionable accounting practices or wilfully breaching Recfishwest's Code of Conduct or other policies or procedures; including the unauthorised disclosure of confidential information;

- Is potentially damaging to Recfishwest, a Recfishwest employee or a third party, such as unsafe work practices, environmental damage, health risks or substantial wasting of company resources;
- May cause financial loss to Recfishwest or damage its reputation or be otherwise detrimental to Recfishwest's interests;
- Involves any other kind of impropriety, harassment, discrimination, victimisation or bullying.

3. Individuals reporting conduct must act in good faith

Recfishwest supports measures enabling disclosure of reportable conduct based on honesty, integrity and ethical behaviour, but will not support an abuse of process intended to cause disruption or for vindictive personal reasons, is deliberately or recklessly false or based on grievances having no foundation within the proper meaning of reportable conduct. To report conduct, there must be a genuine and well founded belief that there has been wrong-doing.

Where a Whistleblower's report of inappropriate conduct is subsequently determined to be malicious or knowingly false, disciplinary action may be applied as appropriate.

Similarly, any Recfishwest employee or manager who retaliates or takes adverse action against an individual making a report or disclosure may also be subject to disciplinary action.

4. Whistleblower Protection

Central to this policy is the need to encourage individuals to report inappropriate conduct by ensuring protection to those who do so in good faith.

This is achieved by supporting reporting of inappropriate conduct, and ensuring that conduct is detected, addressed appropriately and mechanisms, to the degree possible, are put in place to prevent similar future occurrences.

The Whistleblower Policy is not designed to replace normal communication channels between management and employees to address questions, concerns, suggestions or complaints. If employees have any concerns about what is proper conduct for themselves or others, it is expected they will do the right thing and raise their concern. In most instances the employee's immediate supervisor is in the best position to address an area of concern. Serious matters not satisfactorily resolved should be escalated through appropriate management channels in the normal course of business.

To report conduct to the Whistleblower Protection Officer, individuals can make a report via one of the methods listed below:

Phone: 0409 185 162
Kevin Gammage
Chairman, Corporate Governance Committee

Email: kevin@novalegal.com.au

If the individual wishes to remain anonymous he or she may do so.

Where a report is not made anonymously, all reasonable steps will be taken to maintain the confidentiality of the Whistleblower. This means that details of the Whistleblower will only be released to persons who have a “need to know”, usually arising from an obligation to investigate or to take remedial or disciplinary action. In limited circumstances, Recfishwest may be required to disclose the identity of the Whistleblower, details of the reportable conduct or information that may lead to the identification of the Whistleblower, including where it is required by law and where it is necessary to prevent or mitigate a serious threat to a person’s health and safety.

5. Investigation

Recfishwest has appointed a designated Whistleblower Investigation Officer whose role is to investigate all cases of reportable conduct made under this policy as soon as possible after the matter has been reported. That officer will, where appropriate, provide feedback to the Whistleblower regarding the investigation’s progress and outcome (subject to considerations of the privacy of those against whom allegations are made).

The investigation will be conducted in a timely, thorough, confidential, objective and fair manner as would be reasonable and appropriate having regard to the nature of the reportable conduct and all of the circumstances.