

Disclosable Matters (Whistleblower) Policy and Procedure

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1. Purpose

Croker Grain is committed to fostering a culture of ethical conduct, transparency, and integrity. This policy explains how individuals can safely report misconduct or serious wrongdoing and how Croker Grain will protect and support those who speak up. It ensures compliance with legal obligations and supports the company's values and long-term sustainability.

2. Scope

This policy applies to current and former employees, officers and directors, contractors, suppliers (paid or unpaid), consultants and their employees, associates of Croker Grain, and relatives, dependents, or spouses of these individuals.

3. Responsibilities

Under the Corporations Act 2001 (Cth), section 1317AI requires certain companies to have a whistleblower policy that sets out prescribed matters. ASIC's Regulatory Guide 270 (RG 270.14) states that the entity's board is ultimately responsible for the whistleblower policy as part of its broader risk management and corporate governance framework.

The Board of Croker Grain, either directly or through its risk committee, will ensure that trends, themes, and emerging risks identified through disclosures are communicated to the Board via eligible recipients. The Board will then ensure these matters are addressed and mitigated as part of Croker Grain's risk management and corporate governance planning. This includes integrating lessons learned into compliance programs, internal controls, and strategic risk reviews.

4. Policy Statement

Croker Grain encourages the reporting of disclosable matters and is committed to protecting those who make disclosures. The company will ensure fair treatment of individuals mentioned in disclosures, promote a culture of openness, and take all reasonable steps to deter unethical behaviour and maintain compliance with the law.

5. Legal Basis

This policy is implemented in accordance with section 1317A1 of the Corporations Act 2001 (Cth), which requires certain companies to have a whistleblower policy and make it available to officers and employees. It also reflects guidance provided by ASIC in Regulatory Guide 270 (Whistleblower Policies). Where disclosures relate to tax matters, protections under Part IVD of the Taxation Administration Act 1953 (Cth) apply

a. Tax Whistleblower Protections

Where a disclosure relates to tax affairs, protections under Part IVD of the *Taxation Administration Act 1953* apply. These protections include confidentiality of identity, protection from detrimental acts or omissions, and immunity from civil, criminal, and administrative liability for making the disclosure. For more information, visit the [ATO Whistleblower Information page](#).

6. Disclosable Matters

Reports can be made about conduct that involves illegal activity, fraud, money laundering, misappropriation of funds, bribery or corruption, breaches of laws or regulations, conduct that endangers public safety or the financial system, or retaliation against whistleblowers.

Personal work-related grievances, such as interpersonal conflicts or promotion decisions, are not covered unless they involve victimisation or a breach of law. Employees should raise such grievances through internal human resource channels.

7. Eligible Whistleblowers

To qualify for protection, a person must be an eligible whistleblower and make a disclosure to an eligible recipient, to ASIC, APRA, or the ATO, to a legal practitioner for legal advice, or as a public interest or emergency disclosure under the legal criteria.

8. Eligible Recipients

Disclosures may be made to the Chairperson of the Board, the Managing Director, any person authorised by Croker Grain, external regulators such as ASIC, APRA, or the ATO, or a legal practitioner.

9. External Reporting Contacts

Whistleblowers may also report directly to external regulators:

- ASIC (Australian Securities and Investments Commission): [Report Misconduct Online](#)
- APRA (Australian Prudential Regulation Authority): Email: whistleblower@apra.gov.au | [APRA Whistleblower Information](#)
- ATO (Australian Taxation Office): Tip-off Hotline: 1800 060 062 | [ATO Whistleblower Information](#)

10. How to Make a Disclosure

Disclosures can be made

- in person
- by email to an eligible recipient
- by post marked “Confidential – Whistleblower Disclosure.”

Disclosures may be made anonymously. Croker Grain encourages internal reporting first but recognises that external disclosures may be appropriate

11. Legal Protections for Whistleblowers

Whistleblowers who qualify for protection are entitled to confidentiality of identity, protection from detrimental acts or omissions, civil, criminal and administrative liability protection, and compensation or remedies if they suffer loss because of their disclosure

12. Support and Practical Protection

Croker Grain will assess and manage risks of detriment and provide practical support options. These may include referral to a confidential counselling service on a case-by-case basis, providing contact details for independent legal

practitioners, access to community resources such as Lifeline (13 11 14) and Beyond Blue (1300 22 4636), and flexible work arrangements such as temporary changes to duties, location, or hours to reduce stress or risk of detriment. Complaints of detriment will be investigated separately and confidentially. These measures ensure whistleblowers receive appropriate support even though Croker Grain does not operate a formal Employee Assistance Program (EAP).

13. Handling and Investigating Disclosures

All disclosures will be assessed to determine if they qualify for protection. Croker Grain will ensure that the location and timing of any disclosure meeting are appropriate to protect confidentiality and comfort for the whistleblower. Investigations will focus on the substance of the disclosure rather than the motive of the whistleblower, ensuring impartiality and fairness.

When investigating, Croker Grain will consider factors such as the nature and scope of the allegations, required expertise, and potential risks to individuals involved.

a. Best Practice Standards for Investigations

- Independence: Investigations will be conducted by personnel not involved in the subject matter, and external investigators will be engaged where necessary.
- Objectivity: Focus on facts and evidence, not motives.
- Confidentiality: Protect the identity of the whistleblower and limit access to sensitive information.
- Procedural Fairness: Allow individuals mentioned in disclosures an opportunity to respond before any adverse findings.
- Timeliness: Investigations will be conducted promptly, with updates provided to the whistleblower where possible.
- Documentation: Maintain clear records of steps taken, decisions made, and outcomes.

b. Ensuring Independence

To maintain independence:

- Investigations will be conducted by personnel who are not involved in the subject matter of the disclosure.
- Where necessary, Croker Grain will engage external investigators to ensure impartiality.
- Investigators will report findings directly to the Board or its delegated committee, bypassing any individuals implicated in the disclosure.

c. Keeping the Discloser Informed

Whistleblowers will be kept informed where possible. Updates may be provided when the investigation begins, during progress, and after finalisation, without compromising anonymity.

d. Consent for Limited Disclosure

Where required to progress the investigation, Croker Grain may seek the discloser's consent for limited disclosure of information to specific roles such as the Whistleblower Protection Officer or Investigation Officer. Consent will always be voluntary and documented.

Croker Grain will also provide an avenue for review if a whistleblower is dissatisfied with the outcome of an investigation. Reviews will be conducted by an independent officer not involved in the original investigation.

e. Documenting and Reporting Findings

All investigation findings will be documented securely and reported to the Board or its delegated committee responsible for oversight of this policy. Reports will preserve confidentiality by removing identifying details unless disclosure is legally required or consented to by the whistleblower. The discloser will receive confirmation that the investigation has concluded and, where appropriate, a summary of the outcome. However, details may be limited to protect privacy, legal obligations, or ongoing risk management. The method and level of detail provided will depend on the nature and complexity of the disclosure.

If the discloser is not satisfied with the outcome, Croker Grain will provide an avenue for review to confirm whether the policy, processes, and procedures were properly followed. Croker Grain is not obliged to reopen an investigation if the review finds the investigation was conducted appropriately or if new information

is unavailable or would not change the findings. This does not preclude the discloser from lodging a complaint with an external regulator such as ASIC, APRA, or the ATO.

All investigation findings will be documented securely and reported to the Board or its delegated committee responsible for oversight of this policy. Reports will preserve confidentiality by removing identifying details unless disclosure is legally required or consented to by the whistleblower. The discloser will receive confirmation that the investigation has concluded and, where appropriate, a summary of the outcome. However, details may be limited to protect privacy, legal obligations, or ongoing risk management. The method and level of detail provided will depend on the nature and complexity of the disclosure.

14. Fair Treatment of Individuals Mentioned

Croker Grain will ensure confidentiality during investigations, inform individuals of allegations when appropriate, provide access to support services, and guarantee procedural fairness before any adverse findings

15. Accessibility and Training

This policy will be provided to all employees during induction and refresher training, made available on the SiteDoc's platform, and promoted through internal communications such as email or WhatsApp group chats.

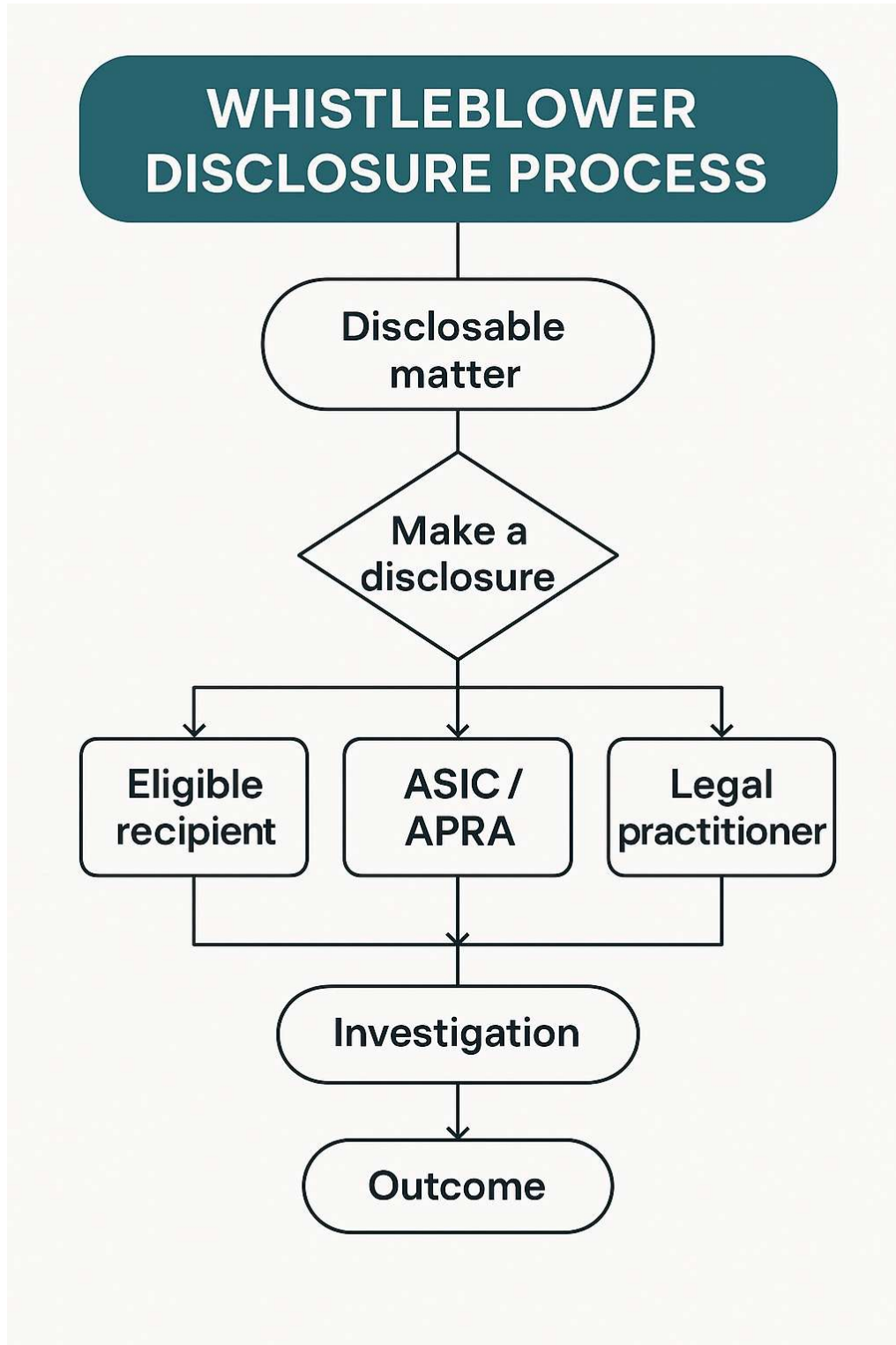
Staff with dedicated roles in relation to this policy will receive training relevant to their roles within the policy.

16. Review and Oversight

The Board or its delegated committee will review this policy annually. Updates will be communicated to all staff, and effectiveness will be monitored through reporting and feedback.

17. Appendices

Appendix A: Flow Chart



Appendix B: Compliance Checklist

This compliance checklist aligns with the mandatory requirements under *section 1317AI (5) of the Corporations Act 2001 (Cth)* and ASIC's *Regulatory Guide 270 (Whistleblower Policies)*. It ensures that all required elements are addressed in this policy.

Requirement – CORPORATIONS ACT 2001 – SECT 1317AI Whistleblower policies	Covered in Policy
Purpose of the policy (see s1317AI)	Purpose
Who the policy applies to (see s1317AI(5)(a))	Scope
Matters the policy applies to (Disclosable Matters) (see s1317AI(5)(a))	Disclosable Matters
Who can make a disclosure (Eligible Whistleblowers) (see s1317AI(5)(a))	Eligible Whistleblowers
Who can receive a disclosure (Eligible Recipients) (see s1317AI(5)(b))	Eligible Recipients
External reporting contacts (good practice)	External Reporting Contacts
How disclosures can be made (see s1317AI(5)(b))	How to Make a Disclosure
Legal protections for whistleblowers (see s1317AI(5)(a))	Legal Protections for Whistleblowers
Support and practical protection for whistleblowers (see s1317AI(5)(c))	Support and Practical Protection
How disclosures will be investigated (see s1317AI(5)(d))	Handling and Investigating Disclosures
Fair treatment of individuals mentioned in disclosures (see s1317AI(5)(e))	Fair Treatment of Individuals Mentioned
How the policy will be made accessible (see s1317AI(5)(f))	Accessibility and Training
Review and oversight arrangements	Review and oversight
Definitions (good practice)	Appendix A: Definitions

References / Related Documents

Internal Related Documents	External Related Document
MCC_002_REV0 Behavioural Standards.pdf	Corporations Act 2001 - Federal Register of Legislation
MCC_017_REV2 HR Policy.pdf	Fair Work Act 2009 - Federal Register of Legislation
	RG 270 Whistleblower policies ASIC
	Legal database - View: Principal legislation: SECTION 1317AI
	Report REP 758 Good practices for handling whistleblower disclosures
	CORPORATIONS ACT 2001 - SECT 1317AI Whistleblower policies
	Make a report of misconduct to ASIC ASIC
	Become a 'whistleblower' or make a public interest disclosure APRA
	Tax whistleblowers Australian Taxation Office

Version Control

Version	Date	Summary Of Changes	Submitted By	Approved By
0	21/11/25	Initial document. Tabled and approved at board meeting 20/11/25.	Erin Bowden	Board