

# Whistleblower Framework

## 1. Purpose

Cement Australia requires its employees, agents and contractors to act ethically, legally, fairly and in compliance with its policies at all times.

The **purpose** of this Whistleblower Framework is to provide:

- confidential access to timely advice and guidance so that employees feel able to raise concerns about actual or suspected wrongdoings;
- an investigation mechanism which protects employees from reprisal or disadvantage.

## 2. Scope

The concerns that could be raised through the Whistleblower Framework include:

- dishonesty, theft and fraud;
- bribery and corruption;
- money laundering;
- anti-competitive behaviour;
- bullying, harassment or any other inappropriate workplace conduct;
- accounting irregularities; or
- unresolved serious safety or environmental issues.

An employee who raises a concern in good faith:

- will be expected to provide sufficient information to enable an investigation to be carried out;
- will not suffer any disadvantage on account of making the report.

## 3. Seeking advice — communication channels

An employee who has a concern should:

- 1 use the normal process:** in the first instance, speak to their manager, a more senior manager, their HR manager or a member of the Legal Department; OR
- 2** contact the confidential external service provider:
  - (a) telephone the Whistleblower hotline:** 1800 054 122; or
  - (b) email the Whistleblower service:** CAwhistleblower@au.pwc.com.

The independent service provider will then conduct a preliminary investigation and report the relevant information to Cement Australia in a manner that protects the employee.

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## 4. Anonymity and confidentiality

- Cement Australia will not disclose an employee's identity without their consent unless required to do so by law.
- A person using the framework may seek advice or raise a concern anonymously.
- Reports submitted anonymously will be considered seriously but it may be more difficult to investigate the matter and ultimately resolve the problem.
- If protection is requested by an identified employee, the General Manager Human Resources will contact the employee to discuss the employee's needs.

## 5. Investigations and whistleblower reports

- The General Counsel (or the General Manager Human Resources, if required) will oversee all investigations which will be conducted in a manner that is fair and objective.
- Under no circumstances will a matter be investigated by someone who is implicated in the alleged wrongdoing.

## 6. Protections and sanctions

- Harassment, bullying or victimisation of anyone who raises a concern in good faith will not be tolerated.
- Cement Australia will take disciplinary action against anyone who makes a frivolous or vexatious complaint.



**Rob Davies**

**Chief Executive Officer**

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