

# POLICY ON WHISTLEBLOWING (July 2018)

The Bright Futures Whistleblower Policy, outlined below, aims to:

- Allow and encourage safe reporting of misconduct or illegal activity at Bright Futures;
- Uphold Bright Futures' high standard of ethical conduct and financial responsibility;
- Outline the process for dealing with the reports and protection of whistleblowers; and
- Ensure that misconduct is dealt with appropriately.

## Reportable Conduct

Actual or suspected conduct by an employee or officer of Bright Futures that breaches Bright Futures policy, its Code of Conduct or any law, should be reported.

Reportable conduct includes, but is not limited to:

- Corrupt activities
- Theft, fraud or misappropriation of funds
- Waste or mismanagement of funds
- Abuse of authority and
- Harm to employees or risks to public health, safety or the environment.

## Reporting Process

Concerns relating to reportable conduct should be reported to:

- The EO
- The Chair of the Board
- The Chair of the Finance, Risk & Audit Committee or
- The Auditor.

Upon receiving a report, Bright Futures will investigate concerns appropriately, and will where possible provide feedback regarding the outcome of the investigation and remedial action taken.

## Confidentiality

Bright Futures will protect the identities of both whistleblowers & alleged perpetrators. It will do this by:

- Allowing whistleblowers to report suspicions anonymously;
- Keeping the identities of whistleblowers and alleged perpetrators confidential, and encouraging all parties involved to do the same;
- Keeping details of the report confidential and storing any physical evidence of the proceedings in a secure place;
- Ensuring that a person's participation in a whistleblower investigation will not appear in any employment or personnel records;
- Ensuring that a person's participation in a whistleblower investigation will not result in discrimination or disadvantage in their employment; and
- Providing appropriate protection and support to those who, in good faith, make a report.

