



**Corporate Legal**

**Framework**

**Whistleblower**

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## 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, officers of Cement Australia as well as other individuals who provide goods or services to Cement Australia and their families and dependants (“eligible” whistleblowers) feel able to raise concerns about actual or suspected wrongdoings, and
- an investigation mechanism which protects eligible whistleblowers 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 eligible whistleblower who has reasonable grounds to suspect misconduct or an improper state of affairs or circumstances

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

## 3 Seeking Advice – Communication Channels

An eligible whistleblower 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: [cementaustralia@stoline.com.au](mailto:cementaustralia@stoline.com.au) or
  - (c) make an online disclosure: <http://cementaustralia.stolinereport.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 eligible whistleblower.

## 4 Anonymity and Confidentiality

Cement Australia will not disclose an eligible whistleblower'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 eligible whistleblower, the General Manager – People, Safety and Sustainability will contact the eligible whistleblower to discuss the eligible whistleblower's needs.

## **5 Investigations and Whistleblower Reports**

The General Counsel (or the General Manager – People, Safety and Sustainability, 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 Publication of Framework**

Harassment, bullying or victimisation of anyone who raises a concern and has reasonable grounds to suspect that the information concerns misconduct, or an improper state of affairs or circumstances will not be tolerated.

This Framework is available to all employees on the Cement Australia Controlled Documents system.