



Whistleblower Policy

Purpose and scope

At Blundstone, our Company Values are central to how we do business. We are committed to always seeking to do the right thing, behave ethically, act lawfully, with integrity and minimise our impact on the environment. We encourage our staff and contractors to speak up if they observe or suspect conduct that concerns them. Blundstone will support those who raise their concerns and will not tolerate any form of retaliation or victimisation as a result of someone speaking up in accordance with this Policy or the law. We value people inside our business who report potential misconduct or breaches of the law.

This Policy aims to provide clarity on how Blundstone will support Whistleblowers so that they:

- are encouraged to express their concerns;
- know how to express their concerns;
- know what will happen when they express their concerns; and
- feel safe in expressing their concerns.

This Policy will be made available on Blundstone's intranet and website and will be implemented in the business by forming part of the induction processes for new employees, introductory training for all employees and further embedded into the business with ongoing training and education programs.

Whistleblowers can access legal rights and protections in the Corporations Act 2001 (Cth) in certain circumstances. These circumstances (and the legal protections afforded) are outlined in Part 9.4AAA of the Corporations Act and embedded within this Policy.

Blundstone operates in multiple countries and is subject to applicable local laws. It is intended that this Policy will apply to Whistleblowers in all the countries Blundstone directly operates in. If any local laws are in any way inconsistent with this Policy or impose a higher level of protection than this Policy, those local laws take precedence in that jurisdiction to the extent of the inconsistency.

Definitions

Chief Executive Officer

The Chief Executive Officer means both Co-Chief Executive Officers acting jointly.

Whistleblowing

Whistleblowing is when someone (a Whistleblower) reports or discloses a concern of serious misconduct, described as 'reportable conduct'.

Whistleblower

A Whistleblower can be an employee, executive, contractor, supplier, distributor, auditor, director of Blundstone, or a relative or dependent or spouse of those individuals.

Reportable conduct

Reportable conduct is any conduct that has occurred in relation to Blundstone, or by an employee or officer of

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Blundstone, that is dishonest, fraudulent, corrupt, illegal, unethical, in breach of internal policies, misconduct or an improper state of affairs or dangerous, or represents a danger, to the public.

Reportable conduct does not include ‘personal work grievances’ which include grievances relating to a staff member’s current or former employment or engagement and have implications for that person, but do not have broader implications for Blundstone or the wider public. For example, a decision which does not involve a breach of workplace laws.

Personal work grievances will be dealt with under the Blundstone internal *Workplace Harassment and Anti-discrimination Policy* and /or *Managing Poor Performance and Misconduct Policy*, as applicable.

Disclosures that are not considered to be reportable conduct do not qualify for protection under the *Corporations Act*.

Eligible Recipient

An eligible recipient is a person at Blundstone who is able to receive your report or disclosure.

To be eligible for protection under this Policy and the *Corporations Act* you must only disclose or report to an eligible recipient (see ‘Making a report’ below).

Whistleblower Protection Officer

The Whistleblower Protection Officer (“WPO”) is the person assigned to an identified Whistleblower and who will safeguard the interests of the Whistleblower.

The Whistleblower Protection Officers at Blundstone are:

1. Group Human Resources Manager - Michael Gozzi (mgozzi@blundstone.com); and
2. Human Resources Coordinator – Kate Fee (kfee@blundstone.com).

If there is a conflict of interest with the Whistleblower Protection Officer the Chief Executive Officer will appoint an alternative Whistleblower Protection Officer, at their discretion.

Whistleblower Investigation Officer

The Whistleblower Investigation Officer (“WIO”) is responsible for the investigation of a disclosure made under this Policy. A Whistleblower Investigation Officer will be appointed by the Chief Executive Officer. Where the disclosure relates to the Chief Executive Officer, the Chairman of the Board of Directors will appoint the Whistleblower Investigation Officer.

The Whistleblower Investigation Officer will be either an internal officer or an investigator external to Blundstone, depending on the nature of the allegations made and the person or persons against whom they are made and at the discretion of the Chief Executive Officer or the Chairman, as appropriate.

The skills and qualifications required of the Whistleblower Investigation Officer will be determined at the time of appointment, based on the nature of the allegations. The Whistleblower Investigation Officer will either possess sufficient knowledge of, or be allowed to obtain advice on, any technical, financial, legal or other matters that may be relevant to the investigation.

Detrimental conduct

Detrimental conduct is conduct which is aimed at a Whistleblower including but is not limited to:

- termination of employment;
- harassment, bullying or intimidation;
- personal or financial disadvantage;
- unlawful discrimination;
- harm or injury including psychological harm;
- damage to reputation or property; or
- any other conduct that constitutes retaliation.



Making a report

An individual is encouraged to follow the normal reporting channels and discuss their concerns with their immediate supervisor, line manager or usual Blundstone contact where it is appropriate, and the person feels that a formal disclosure is not required.

If the nature of the matter is such that it is not appropriate to report through the normal channels or it has been reported through the normal channels and no action has been taken then the Whistleblower can contact an eligible recipient to lodge a formal disclosure or report.

At Blundstone the eligible recipients are:

1. Darryl Wilkes, Co-Chief Executive Officer
phone +61 419 382 691
email dwilkes@blundstone.com
2. Adam Blake, Co-Chief Executive Officer
phone +61 400 994 409
email ablake@blundstone.com
3. Joanne Moran, Chief Financial Officer & Company Secretary
phone +61 419 535 921
email jmoran@blundstone.com
4. Steve Gunn, Non-Executive Director & Chairman
phone +61 419 554 503
email chair@blundstone.com
5. Damian Bugg, Non-executive Director
phone +61 418 123 412
email djb46@netspace.net.au
6. Danny McCarthy, External Auditors WLF
phone +61 3622 36155
email danny.mccarthy@wlf.com.au

You can also:

- email your concerns to Whistleblower@blundstone.com ; or
- send a letter (marked “Private and Confidential”) to the attention of one of the above at Blundstone Australia Pty Ltd, 88 Gormanston Road, Moonah Tas 7009.

Emails to Whistleblower@blundstone.com will be sent to all eligible recipients listed above.

Disclosures should be factual and as detailed as practicable and include the following information:

- exact nature of the alleged misconduct believed to have occurred;
- when it took place;
- where it took place;
- who was involved; and
- any witnesses to the misconduct.

Whistleblowers will not be penalised in any way if the investigation finds that the disclosure cannot be substantiated and will still be protected by law, however action can be taken if disclosures are found to be intentionally vexatious or without reasonable cause.



Additional Information

If you would like to speak to someone to obtain additional information before making a disclosure you can contact Whistleblower Protection Officers:

1. Group Human Resources Manager - Michael Gozzi
email: mgozzi@blundstone.com ; or
2. Human Resources Coordinator -Kate Fee
email: kfee@blundstone.com ; or

any of the eligible recipients.

Anonymity

The Whistleblower has the option to remain anonymous when making a report of misconduct, however by remaining anonymous the investigation may be impacted negatively. Further by remaining anonymous a Whistleblower may not be able to receive feedback on the status of the investigations or be afforded the protections and support available under this Policy and at law.

Public Interest & Emergency disclosures

A public interest disclosure can be made to a journalist or a parliamentarian if:

- the Whistleblower has already made a disclosure in accordance with this Policy; **and**
- at least 90 days have passed since the previous disclosure was made; **and**
- the Whistleblower has reasonable grounds to believe that no action is being, or has been, taken to address the matters to which the previous disclosure was made; **and**
- the Whistleblower has reasonable grounds to believe that making a further disclosure of the information would be in the public interest; **and**
- notice is given to Blundstone.

An emergency disclosure can be made to a journalist or a parliamentarian if:

- the Whistleblower has already made a disclosure in accordance with this Policy; **and**
- the Whistleblower has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment.

Conducting an Investigation

All disclosures made in accordance with this Policy will be investigated with the objective of obtaining evidence that confirms or refutes the allegations made by the Whistleblower.

Investigations will be conducted by the Whistleblower Investigations Officer. The appointed Whistleblower Investigation Officer will be fair and independent in their investigation and will not have any conflict of interest or connection to the person against whom the allegation has been made, the Whistleblower, or the misconduct.

Blundstone will ensure that all persons are treated fairly during the investigation and that the investigation is conducted without any bias, unconscious or otherwise. It may be deemed appropriate to stand down the person/s alleged to have engaged in the misconduct for the duration of the investigation, at the discretion of the Chief Executive Officer (or the Chairman, as appropriate), however this action does not indicate any inference of wrongdoing or assumption of guilt. Any person against whom an allegation has been made will be given the opportunity to respond during the investigation.

If requested, the identity of the Whistleblower will be kept confidential, except in the case where Blundstone is legally required to disclose the information. Information shared during the investigation will be de-identified as much as is reasonably practicable in the circumstances.

During the course of the investigation, the Whistleblower and other involved parties are permitted to seek independent legal advice. The cost of such advice may be reimbursed by Blundstone, at the discretion of the Chief



Executive Officer (or the Chairman, as appropriate).

As soon as practicable after the investigation is completed the Whistleblower Investigation Officer will prepare a report providing a summary and findings of the investigation including whether the allegation of misconduct was substantiated or unsubstantiated. The report will also contain recommendations for appropriate measures to be taken, which may include notification to regulatory and/or enforcement agencies such as the Police. The report will be provided to the Chief Executive Officer, Board of Directors, the Whistleblower and any other relevant parties, at the discretion of the Whistleblower Investigation Officer.

Protecting and supporting Whistleblowers

Blundstone is committed to ensuring that Whistleblowers are supported and protected from all forms of detrimental conduct and will take action where detrimental conduct is identified (refer to page 2 for definition of 'detrimental conduct').

All information provided by the Whistleblower, and generally information provided in relation to the investigation, will be treated confidentially and sensitively, including the identity of the Whistleblower, which will only be shared if the Whistleblower consents or it is required by law.

The Whistleblower Investigation Officer will take all reasonable steps to de-identify information that forms part of the investigation to protect the identity of the Whistleblower.

The Whistleblower Protection Officer will support the Whistleblower throughout the investigation process ensuring that they have access to confidential counselling services provided free of charge by Blundstone and regular updates on the status of the investigation.

Eligible Whistleblowers are protected by law under the *Corporations Act 2001* and *Tax Administration Act 1953* from prosecution against certain legal actions that may arise from the disclosure, however immunity is not granted for misconduct the Whistleblower was involved which is identified as part of the investigation. To qualify for protection as a Whistleblower the disclosure must be by a Whistleblower and involve Reportable Conduct.

Related documents

Corporations Act 2001 (Cth), Taxation Administration Act (Cth) 1953, Workplace Harassment and Anti-discrimination Policy and Blundstone Company Values

Review of this Policy

This Policy will be reviewed every two years.