

Document No.	EM.01.HR.06
Document Title	Whistleblower Policy
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Revised By	Kelly Ellis (Engage Marine)
Version [Status]:	0.3 [Draft]



WHISTLEBLOWER POLICY

1 PURPOSE

This policy supports the Engage Marine Group in its management of whistleblowers and whistleblowing activity as set out by the Australian Securities & Investments Commission (ASIC) and the Corporations Act 2001. This policy guides the organisation and its officers on how to support people to raise concerns about service delivery in the interests of service safety and quality.

This policy is used to support whistleblowers, who in good faith and without malice, disclose information or raise concerns about alleged improper or illegal activity.

The Engage Marine Group and our staff are committed to providing services in a safe and honest way. We expect everyone to comply with all legal requirements. We will support and respect anyone who acts as a whistleblower to draw attention to suspected inappropriate, unethical, or illegal conduct or behaviour.

2 SCOPE

Whistleblower

A person who raises concern regarding illegal and/or improper conduct that affects others. The person is not always involved with the issue but is wanting to alert others to suspected issues or misconduct.

3 SCOPE

This procedure applies to all relevant operating entities of the Engage Marine Group as defined within the Integrated HSEQ Manual.

This policy applies to Partners, Directors, Supervisors, departmental managers, employees, contractors, and consultants (collectively referred to as crew and personnel) engaged by or performing work for the Company.

Any breaches of the Code of Conduct, related policies, and issues that may adversely affect Engage Marine may be reported. This may include any criminal offence, breach of legal obligation, unsafe behaviour, harassment or bullying.

4 PRINCIPLES

- The Engage Marine Group encourages people to speak up, to make complaints and raise concerns about service integrity, safety, and quality.

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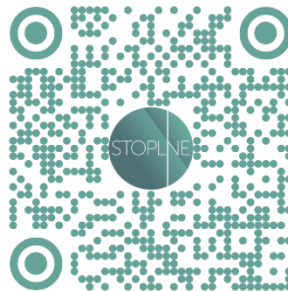
- The Engage Marine Group will respond appropriately to concerns about illegal or inappropriate conduct, whether that's provided as feedback, a complaint or a person acts as a whistleblower.
- People who 'blow the whistle' will not be victimised or retaliated against and will be treated fairly and with respect at all times.
- Whistleblowers are protected against reprisals.

5 INTERNAL DISCLOSURE PROCESS

Engage Marine has partnered with Stopline - Australia's leading provider of whistleblowing programs and related hotline services to create the Engage Marine Whistleblower Hotline.

The Engage Marine whistleblower hotline is an independent and confidential service available to receive information relating to improper conduct, unlawful or unethical behaviour and supports Engage Marine's values and code of conduct.

THE ENGAGE MARINE WHISTLEBLOWER HOTLINE - 1300 30 45 50



The Engage Marine whistleblower hotline can be used to report suspected:

- Theft;
- Fraud;
- Dishonesty;
- Bullying and harassment;
- Policy breaches;
- Unethical behaviour; or
- Workplace safety hazard

The service includes:

- Dedicated hotline number, website, mail and email address for employees, contractors and other stakeholders to report suspected incidents of improper conduct.
- Expert forensic investigators taking the calls and analysing disclosures.
- Timely reporting of incidents to dedicated representatives within Engage Marine.

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6 EXTERNAL DISCLOSURE PROCESS

Whistleblowers are covered by the whistleblower protections if they report concerns to ASIC, even if they have not first raised concerns internally. They can lodge a report through ASIC's [online misconduct reporting form](#) or by writing to [ASIC](#).

Individuals can report concerns to ASIC anonymously; however, they will not be able to follow up for further information. In these instances, individuals will still qualify for the whistleblower protections.

7 PROTECTION AGAINST DETRIMENTAL ACTION

The Corporations Act 2001 (Cth) protects a whistleblower against certain legal actions related to making the whistleblower disclosure, including:

- Criminal prosecution (and the disclosure cannot be used against the whistleblower in a prosecution, unless the disclosure is false)
- Civil litigation (such as for breach of an employment contract, duty of confidentiality, or other contractual obligation), or
- Administrative action (including disciplinary action).
- If individuals are the subject of an action for making a whistleblower disclosure, they may rely on this protection in their defence.

This protection does not grant immunity to individuals for any misconduct that they were involved in that is revealed in the disclosure.

Any individual who takes detrimental action against a whistleblower will face disciplinary action, which could include termination of employment and/or other legal consequences.

Detrimental action may include:

- Demotion or dismissal
- Harassment or intimidation
- Discrimination or bullying
- Any form of retaliation that negatively impacts the whistleblower's employment or well-being.

8 FURTHER INFORMATION

An F.A.Q. for further information on Stopline and the whistleblowing process can be found [here](#) or at the QR code above.

Further information on whistleblower rights and protections in the corporate sector can be found at the ASIC information portal [HERE](#).