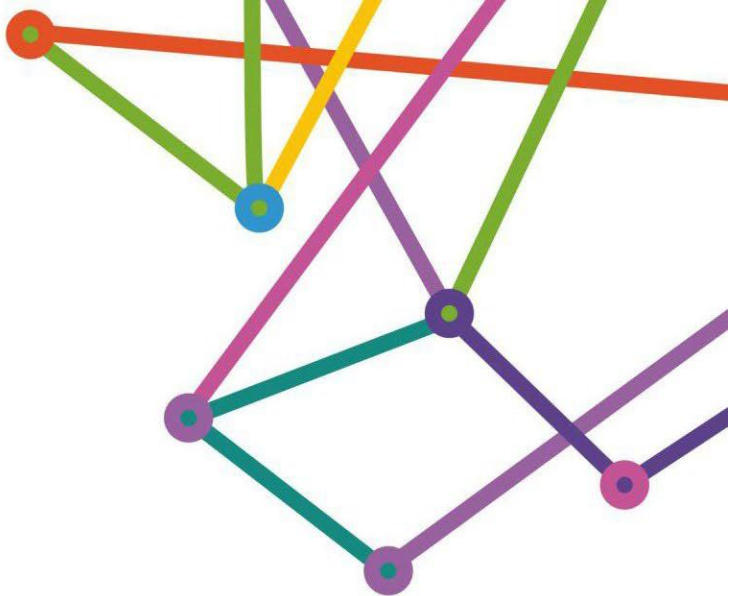




WHISTLEBLOWER PROTECTION POLICY

WAPHA BOARD ENDORSED: 03 DECEMBER 2025



**WA Primary
Health Alliance**
Better health, together

phn
PERTH NORTH, PERTH SOUTH,
COUNTRY WA
An Australian Government Initiative

CONTENTS

1.	PURPOSE.....	3
2.	SCOPE.....	3
3.	CODE OF CONDUCT.....	3
4.	REPORTING RESPONSIBILITY	3
5.	WHEN TO USE THIS POLICY	3
6.	NO RETALIATION	3
7.	REPORTING PROCEDURE	3
7.1	Internal Reporting Procedure	3
7.2	External Reporting Procedure.....	4
8.	ESCALATION FLOWCHART	4
9.	COMPANY SECRETARY	5
10.	ACCOUNTING AND AUDITING MATTERS	5
11.	ACTING IN GOOD FAITH	5
12.	CONFIDENTIALITY	5
13.	HANDLING OF REPORTED VIOLATIONS.....	5
14.	BREACH OF POLICY.....	5
15.	CONTINUOUS IMPROVEMENT	5
16.	VARIATION REPLACEMENT OR TERMINATION OF POLICY	5
17.	RELATED DOCUMENTS	6
17.1	Legislation/regulations	6
17.2	Policies	6
17.3	Other.....	6
18.	ABBREVIATIONS AND DEFINITIONS.....	6
18.1	Abbreviations.....	6
18.2	Definitions	6
19.	DOCUMENT MANAGEMENT	7
20.	AUTHORISATION	7
21.	VERSION HISTORY	8

1. PURPOSE

This whistleblower protection policy (Policy) outlines the responsibility of WA Primary Health Alliance (WAPHA) to protect any Employee who reports a concern about a violation of WAPHA's *Code of Conduct*, breach of WAPHA's *Fraud Policy*, and/or suspected violation of law or regulation that governs WAPHA's operations.

2. SCOPE

This Policy applies to all WAPHA Employees.

3. CODE OF CONDUCT

WAPHA requires all Employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of WAPHA, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Please refer to WAPHA's *Code of Conduct* for further information, if required.

4. REPORTING RESPONSIBILITY

The Policy is intended to encourage and enable Employees and others to raise serious concerns internally so that WAPHA can address and correct inappropriate conduct and actions. It is the responsibility of all Employees to report concerns about violations of the *Code of Conduct*, breaches of the *Fraud Policy*, and/or suspected violations of laws or regulations governing WAPHA's operations.

5. WHEN TO USE THIS POLICY

Reportable conduct includes:

- Suspected fraud, corruption, or theft.
- Breaches of law or regulatory obligations.
- Serious misconduct or unethical behaviour impacting WAPHA operations.
- Danger to public health or safety.

Do **NOT** use this Policy for:

- Personal employment grievances (e.g., pay disputes, performance issues).

These should follow WAPHA's Grievance Handling Policy & Procedure.

6. NO RETALIATION

It is contrary to WAPHA's values for anyone to retaliate against any Employee who, in good faith, reports an ethics violation, a suspected violation of law, such as a complaint of discrimination, suspected fraud, or a suspected breach of any regulation governing WAPHA's operations.

7. REPORTING PROCEDURE

7.1 Internal Reporting Procedure

WAPHA aims to create an environment that fosters and supports Employees to share their questions, concerns, suggestions, or complaints with their Line Manager. If an Employee is not comfortable speaking with their Line Manager or is dissatisfied with the Line Manager's response, the Employee is encouraged to talk with WAPHA's Company Secretary or Chief Executive Officer (CEO).

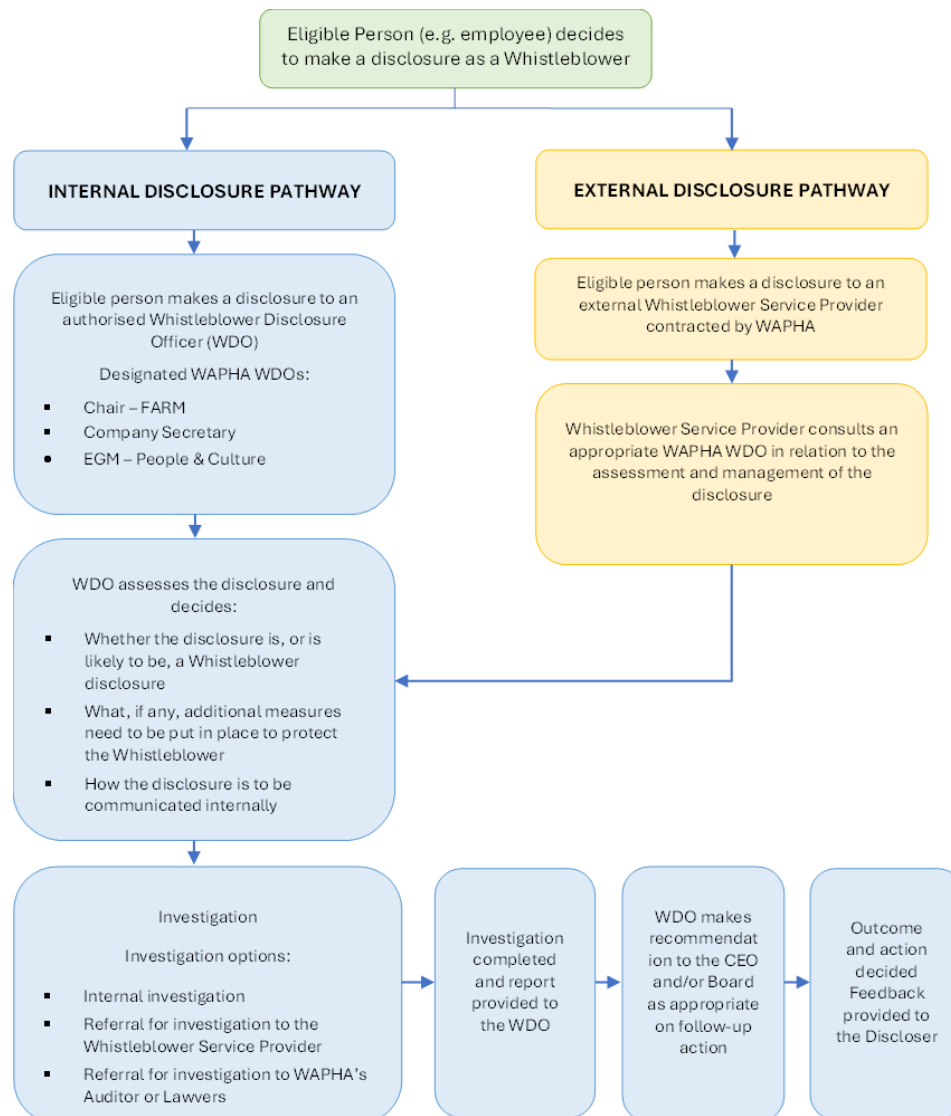
Line Managers are required to report, in writing, complaints or concerns about suspected ethical or legal violations to the Company Secretary or the CEO.

7.2 External Reporting Procedure

In addition to the internal reporting mechanisms outlined in 6.1 of this Policy, Employees may report concerns or complaints regarding violations of the Code of Conduct, breaches of the Fraud Policy, or suspected violations of law or regulation to an independent, external, confidential reporting service. This service operates independently of WAPHA and provides Employees with a secure, anonymous way to submit concerns. Details regarding the external service, including contact information and reporting protocols, shall be disseminated to all Employees via the WAPHA intranet and other appropriate communication channels. Reports submitted through the external service will be handled with strict confidentiality, and WAPHA will ensure that no retaliation occurs against any Employee who makes a report in good faith through this channel.

8. ESCALATION FLOWCHART

You are protected under the Corporations Act and WAPHA Policy from retaliation. Reports can be made anonymously.



9. COMPANY SECRETARY

WAPHA's Company Secretary is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Company Secretary will advise the CEO and/or Board members on all complaints and their resolutions, and will report at least annually to the chair of the FARM Committee on compliance activities relating to accounting or alleged financial improprieties.

10. ACCOUNTING AND AUDITING MATTERS

The Company Secretary shall immediately notify the FARM Committee of any concerns or complaints regarding corporate accounting practices, internal controls, or auditing, and work with the Committee until the matter is resolved.

11. ACTING IN GOOD FAITH

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations made maliciously or knowingly to be false will be viewed as a serious disciplinary offence.

12. CONFIDENTIALITY

The complainant may submit violations or suspected violations on a confidential basis. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Employees who choose to report concerns through the external independent confidential reporting service are assured that their identity and the details of their complaint will be protected to the fullest extent possible. The external service is designed to maintain strict confidentiality and anonymity, ensuring that whistleblowers feel safe and supported when raising concerns.

13. HANDLING OF REPORTED VIOLATIONS

The Company Secretary will notify the person who submitted the complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted.

14. BREACH OF POLICY

An Employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

15. CONTINUOUS IMPROVEMENT

This Policy is subject to WAPHA's continuous quality improvement processes. Improvements (resulting from audits, incidents, risks, feedback, complaints, staff suggestions or legislative changes) are implemented, monitored and reviewed by the document owner, and the Policy is updated accordingly.

Due to the ongoing review, ensure the Policy version is up to date when referring to the contents. Downloaded or printed copies stored outside of Corporate Documents are uncontrolled and may be out of date.

16. VARIATION REPLACEMENT OR TERMINATION OF POLICY

WAPHA reserves the right to vary, replace or terminate this Policy at any time. Where the variation, replacement or termination is likely to have a significant impact on Employees, WAPHA shall consult with those potentially affected Employees and incorporate reasonable feedback before finalising the variation, replacement, or termination.

17. RELATED DOCUMENTS

Throughout this Policy, referenced documents are *italicised* to indicate that they are being referenced.

17.1 Legislation/regulations

This Policy must remain in accordance with the requirements of the legislation below. In this table, (Cth) denotes an act or regulation of the Federal Government of Australia, and (WA) denotes an act or regulation of the state of Western Australia.

Corporations Act 2001 (Cth)

17.2 Policies

TITLE	DOC #
Fraud Policy	FIN.2020.0027

17.3 Other

TITLE	DOC #
Code of Conduct	PNC.2023.0326

18. ABBREVIATIONS AND DEFINITIONS

18.1 Abbreviations

ABBREVIATION	DETAIL
CEO	Chief Executive Officer
CFO	Chief Financial Officer
FARM	Finance, Audit and Risk Management Committee
WAPHA	WA Primary Health Alliance

18.2 Definitions

Throughout this Policy, defined terms are *italicised* to indicate their use as defined terms.

WORD/PHRASE	DEFINITION
Aspire	WAPHA's enterprise resource planning system utilises the Oracle platform for a range of business activities and processes.
The Company Secretary	is the person who is registered with the Australian Securities & Investments Commission as the company secretary of WAPHA.
Corporate Documents	WAPHA's SharePoint library of controlled documents is located on the home page of WAPHA's intranet, hosted on SharePoint, which is known as "Wallace".
Employee(s)	is an individual who has entered into an employment relationship with WAPHA. This includes full-time, part-time, temporary, and casual staff engaged directly by the organisation. For the purposes of this policy, the term <i>Employee</i> excludes

WORD/PHRASE	DEFINITION
	independent contractors, consultants, volunteers, and any other individuals who do not have an employment relationship with the organisation.
Whistleblower Disclosure Officer	is a designated individual responsible for receiving, assessing, and managing disclosures of suspected wrongdoing within an organisation. This role ensures that reports are handled confidentially, impartially, and in accordance with relevant legislation.
Line Manager	The Employee is identified as a person's "line manager" in the Aspire Organisation Chart.
Organisation Chart	The "Organisation Chart" shown in Aspire in the "directory app" details the reporting structure of Employees within WAPHA.

19. DOCUMENT MANAGEMENT

CONTROL DETAILS	ROLE	NEXT REVIEW DATE
Policy Owner	Board	03/12/2026
Policy Steward	CEO	03/12/2026
Operational Custodian	EGM People & Culture	03/12/2026
Approval Authority	Board	03/12/2026
Review Authority	Board (or FARM recommendation)	As requested

20. AUTHORISATION

VERSION PREPARED BY:		
Name	Role	Date
Elaine Meighan	EGM People & Culture	25/11/2025
VERSION REVIEWED BY:		
Name	Role	Date
Rob Salvage	Company Secretary	25/11/2025
VERSION REVIEWED BY:		
Role		Date
Financial, Audit & Risk Management (FARM) Committee		25/11/2025
VERSION APPROVED BY:		
Role		Date
WAPHA Board		03/12/2026

21. VERSION HISTORY

DATE	NEW / REVIEW OR EDITORIAL REVISION	DESCRIPTION OF REVISION	NAME AND POSITION TITLE
DATE OF REVISION / NEW POLICY	Type of revision, e.g. new Policy, editorial revision	Outline the main changes made to the Policy. For new policies state 'New Policy'.	Name and position of person making the revisions or new Policy.
22/11/2023	Version 04: editorial revision	Input into the updated template. Document prefix amended to be FIN	People & Culture
25/11/2025	Version 05: editorial revision	The following amendments have been made to this Policy: 1. Clause 5 has been incorporated to provide a summary of reportable conduct and guidance on situations in which the Policy is not applicable. 2. An escalation flowchart has been introduced in clause 8 to clarify the procedures for reporting and addressing concerns. 3. Clause 12 has been further expanded to address confidentiality, emphasising the critical importance of preserving employee anonymity for individuals who elect to submit a complaint via the independent reporting service. 4. Clauses 7.1 and 7.2 have been added to deliver an overview of both internal and external procedures. Importantly, these clauses make clear that employees can report concerns anonymously through an independent external service. 5. Editorial and formatting revisions have been implemented, including the adoption of numbered bullet points to enhance clarity. Additionally, minor stylistic and grammatical refinements have been made to improve the overall professionalism and coherence of the document.	Elaine Meighan EGM People & Culture Rob Salvage Company Secretary