

Whistleblower Policy

1. Overview

MBM is committed to conducting our business with integrity, openness and honesty and we expect all staff to maintain high standards in accordance with our Code of Conduct. This policy is a key element to support a culture of ethical behaviour, strong corporate governance and effective compliance and risk management. MBM is committed to applying the principles of the various whistleblower laws to protect individuals who make any type of report.

2. Purpose

This policy aims to:

- identify and respond to concerns and foster a culture of continuous improvement
- encourage the reporting of suspected or actual wrongdoing, misconduct, or an improper behaviour within MBM, by MBM or by those whom MBM has relationships with
- assist MBM in identifying the risk of, or any instances of, any breaches of its policies
- protect the whistleblower (internal and external) from any retaliation that may arise as a result of reporting suspected or actual wrongdoing.

This policy sets out the procedures and avenues available to a whistleblower reporting to MBM. This document also provides information about MBM's approach to handling whistleblowing. Whistleblowers should speak up and raise their concern via the channel through which they feel most comfortable.

3. Who is a whistleblower?

A whistleblower is defined as anyone who makes a report under this policy. Consistent with the provisions of the Whistleblower Laws, this will include current and former employees, clients, contractors and suppliers (including employees of suppliers), as well as relatives, spouses and dependants of these individuals. It also includes any person that MBM decides to treat as a whistleblower and protect as a result of making a report that doesn't fall within the scope of the Whistleblower Laws.

4. What can be reported?

MBM encourages the reporting of any suspected or actual wrongdoing, misconduct, or an improper behaviour, including conduct that is dishonest, corrupt, illegal or unethical, or concealment of such conduct. We also encourage the reporting of any suspected or actual breaches of MBM's Code of Conduct, policies or procedures.

The concerns that can be reported include any past, present or likely future activity, behaviour or misconduct such as:

- Harassment
- Bullying
- Sexual harassment
- Discrimination
- Dishonesty

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- Fraud
- Bribery
- Corruption
- Illegal and unethical behaviour
- Any action that may be a breach of a law or any suspected or actual contravention of Human Rights
- Serious improper conduct that may be detrimental to the interests of MBM and its staff, or causes either significant financial or non-financial loss, including endangering health or safety, damaging or substantially risking damage to the environment, and serious mismanagement of MBM resources.

A report under this policy can relate to the conduct of MBM Directors or staff, or its operations and supply chain (which may include our interactions with a third party, including clients, suppliers or service providers).

MBM can provide better support and address concerns raised by staff about interactions at work if the matter is reported directly. In raising any personal work-related grievance, it is important that the grievance raised be genuine and not malicious.

5. Reporting a concern

A concern can be reported by you in a way that is either attributed to the individual raising the matter or can be reported anonymously.

a) Attributed reporting

If you consent to us looking into your concern, there are a number of different channels through which your concern can be reported. These include reporting to:

- the direct line manager
- the National Operations Manager
- the Chief Executive Officer
- <https://whistleblowingservice.org/mbm/>

The report can be made via email, phone call, Teams message or face to face conversation. The report should contain as much information about the issue as possible, to allow for a proper and thorough investigation.

b) Anonymous reporting

Anonymous reports can be made to <https://whistleblowingservice.org/mbm/>

6. What happens to a reported concern?

MBM will promptly investigate any reasonable report of a concern. The task of investigating the matter will be allocated based on the nature of the issue raised and the skillset needed to review such matters. If appropriate, MBM may also engage a third party to assist with the investigation process. Any third party involved will be subject to strict confidentiality obligations.

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We will take action where, as a result of an investigation, we identify wrongdoing, breaches of MBM's Code of Conduct, policies, or procedures, or a contravention of Human Rights.

MBM will keep whistleblowers updated on the progress of investigations where possible and appropriate. The frequency and timeframe of updates will depend on the nature and circumstances of the matter, and MBM will endeavour to complete investigations within a reasonable timeframe. While progress updates will be provided, it may not always be possible to share full details of the investigation findings or outcomes due to confidentiality and legal obligations.

7. Confidentiality and fairness

MBM limits the number of people who have access to the details of a concern raised and information obtained through any investigation process.

Concerns are thoroughly investigated in order to identify verifiable facts and ensure fairness. Those involved in conducting the investigation are required to do so in compliance with MBM's procedures. Decisions around the investigation process and any action required are not made by any person alleged to have been involved in inappropriate conduct or wrongdoing.

All individuals who contribute information to an investigation are directed to maintain confidentiality. We take this step to protect and respect all individuals involved in the process.

If a report concerns the conduct of a particular person, then the matters raised in the report may be discussed with them to obtain an understanding of their perspective. They will be directed to maintain confidentiality, to maintain compliance with MBM's Code of Conduct, policies, procedures and the MBM Values, and to take no action that could be considered retaliatory in nature.

8. Whistleblowing protection and support

We encourage openness and will support individuals who report under this policy, regardless of the outcome of the matter raised.

MBM does not tolerate any form of retaliation or adverse action resulting from a whistleblowing disclosure. Anyone found to be victimising or disadvantaging someone for making a disclosure, or proposing to make a disclosure, under this policy will be subject to disciplinary action.

If a concern is reported, MBM will act in a manner consistent with the protections available under Whistleblower Laws. MBM will not:

- a) subject the whistleblower to any civil, criminal or administrative liability (including disciplinary action) for whistleblowing
- b) enforce a contractual or other remedy or exercise a contractual or other right against the whistleblower based on the whistleblowing; or
- c) cause any detriment to the whistleblower or threaten to cause any detriment to the whistleblower based on the whistleblowing.

This policy is to be read in conjunction with the:

- MBM Code of Conduct
- Complaint and grievance handling procedure
- Roles, responsibilities, accountabilities and authorities' procedure
- Consultation communication and reporting procedure

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- Incident investigation and management nonconformance procedure
- Anti-discrimination and EEO policy
- Bullying policy
- Modern Slavery policy
- Procurement
- Sexual harassment policy
- Meal, entertainment and expense policy
- Anti-bribery and corruption policy

9. FAQs

a) Will someone contact me?

Yes, if you request contact. To protect your anonymity:

Whistleblowing Services (WBS) does not keep any information about you (name, phone number or email details are not collected), so no one will contact you directly.

MBM will not be provided with information about you (name, phone number or email details are not collected), unless you authorise us to do so.

You will be driving this process. All interaction will occur through the online service. While this may take a little longer to obtain the information, this has been chosen to provide higher confidence that making a disclosure is anonymous.

You will need to log back in to WBS to check updates and progress, or upload information and/or evidence.

b) How do I make an Online Report Disclosure?

To make an “**Online**” report please click on the ‘**Make a Report**’ button. You will be redirected to a new page where you need to enter: “ **MBMPL** ” as the “**Unique Key**”.

What happens when I lodge a report?

When you lodge a report, you will be provided with your own unique number which will be up to 20 characters long. **Please keep a record of the unique number.** It will be important if you wish to resume a report, upload more information for your disclosure or monitor progress of your disclosure.

How anonymous is my report?

You will be asked to report the wrongdoing on an electronic form which is entirely between you and WBS. Your identity, information and privacy will be protected by secure 256-bit encryption,

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and you will be able to upload documentation and/or other evidence that you may have to support your information.

Please bear in mind that the information you disclose may mean that:

- a. You can be identified – please ensure that the information is focused on what happened and not necessarily how it was observed
- b. You might disclose your identity (through position/title/role or the connection with the people with whom you have a concern)

c) What are my obligations?

Anyone making a disclosure must:

- act in 'good faith'
 - have reasonable grounds for believing the information disclosed indicates a wrongdoing
- If your disclosure is not made in good faith or is found to be vexatious, malicious, deliberately misleading or frivolous, you may be prosecuted under the Whistle Blowing Protection Authority and Acts and you may be subject to disciplinary action including dismissal.

No action will be taken where the report was made in good faith, but no wrongdoing was identified.

d) What happens after the disclosure is lodged?

Once you make a disclosure to WBS, they will analyse the information provided to assess if additional information is required. Once all relevant information has been obtained MBM will receive the assessment, including potential course(s) of action within one business day. Only an authorised MBM person can investigate the assessment provided by WBS. All disclosures will be the subject of a thorough investigation with the objective of locating all relevant evidence to understand the nature of the issue. Based on the investigation MBM will determine if there is enough information to take the matter further or to close the matter.

Progress will be posted to the WBS Portal. <https://www.whistleblowingservice.report/>

You can also provide updates through the same portal.

e) How is confidentiality maintained?

To protect your identity/anonymity and to retain the confidentiality of the disclosure you can:

- remain completely anonymous; or
- disclose your identity only to WBS and they will not disclose your identity to MBM until they have your permission or until required by law; or
- disclose your identity to both WBS and to MBM at your request.

WBS ensures confidentiality through a combined set of strategies. These strategies can only be compromised by your actions, including:

- talking to people about your proposed or actual disclosure

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- allowing people to access your disclosure using your unique access code
- gathering information from your network (using work items, Laptop, Phone) that specifically or generally relates to your disclosure
- making inquiries from your network (using work items, Laptop, Phone) that specifically or generally relates to your disclosure
- requiring WBS to communicate with you on a specific disclosure using phone calls and email, whether on your work assets or your personal assets

Version Control

Rev. No	Date	Classification	Revision Details	Approved By
1	August 2025	Internal/Confidential	Original Issue	Jayne Mazlin

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