



**WHISTLEBLOWER POLICY**

## Whistleblower Policy

### 1 Policy Statement

Compass Hotel Group Limited ACN 127 909 835, its subsidiaries and related entities (“Compass”) are committed to the aims and objectives of the Whistleblowers Protection Act 2001 (“the Act”) and in particular, recognises the value in developing and fostering a culture of corporate compliance, ethical behaviour and good corporate governance.

Compass also recognises the value of transparency and accountability in its administrative management practices and supports the making of disclosures that reveal improper conduct, fraudulent activity or mismanagement of Compass resources.

This policy is applicable to all Compass employees, directors and officers and related parties and encompasses all subsidiaries comprising Compass.

#### 1.1 Purpose

The purpose of this policy is to:

- (a) Create awareness of the Whistleblower Policy and Whistleblower Protection;
- (b) Help detect and address unacceptable behaviour or improper conduct;
- (c) Provide employees of Compass with a supportive work environment in which they feel able to raise issues of legitimate concern to Compass;
- (d) Provide employees with an avenue for reporting unacceptable or improper conduct;
- (e) Protect individuals who report unacceptable or improper conduct in good faith;
- (f) Improve the communication and transparency in the processes associated with whistleblowing and its consequences, namely reprisals and detrimental action; and
- (g) Enhance perception and the reality that Compass is taking its governance obligations seriously.

#### 1.2 Scope

- (a) This policy does not replace existing Compass policies and procedures. This policy is to be followed only if an employee elects to make a disclosure of suspected or alleged corrupt or improper conduct and seeks protection under the Act.
- (b) Employees are reminded that the terms of their employment include an obligation to ensure that they act in accordance with the Compass Code of Conduct and the Compass policies and procedures.
- (c) Compass will not tolerate the following behaviour by employees:
  - (i) Conduct or practices which are illegal or breach any law, regulation or code of conduct applicable to Compass;
  - (ii) Dishonest, Fraudulent, or Corrupt practices;
  - (iii) Misleading and/or deceptive conduct of any kind including, but not limited to, conduct or representations which amount to improper or

- misleading accounting or financial reporting practices either by or affecting Compass;
- (iv) Situations both within or outside the control of Compass which pose a danger to the health and safety of any person;
  - (v) Situations that are a significant danger to public health and safety or to the environment;
  - (vi) Situations that may cause financial loss to clients and/or Compass or damage to their respective brand name(s) or reputation(s) or be otherwise detrimental to clients' and/or the interests of Compass; and
  - (vii) Acts that involve any other kind of serious impropriety.
- (d) Compass will take all reasonable steps, and do all things necessary, to protect those who make protected disclosures from any detrimental action in reprisal for the making of the disclosure. Compass will also deal fairly with employee(s) who are the subject of the disclosure.
  - (e) Compass is committed to implementing 'best practice' policies and procedures for dealing with allegations of suspected improper activity and the management (and protection) of the individual(s) making the allegation, and this policy is therefore subject to review and change from time to time, at the discretion of the board of directors of Compass.

### 1.3 **Flowchart**

Attached is a Whistleblower Policy and Procedure Flowchart briefly describing the process for dealing with a protected disclosure of any improper conduct or corruption within the organisation.

### 1.4 **Good Faith**

If an employee raises a genuine concern under this policy, he or she will not be at risk of losing their job, nor will they suffer any form of detrimental action as a result. As long as the employee is acting in good faith and in accordance with this policy, it does not matter if they are mistaken.

### 1.5 **How the Whistleblowing Policy Differs From the Grievance Procedure**

This policy does not apply to raising grievances about an employee's personal situation. These types of concern are covered by Compass's grievance procedure. The whistleblowing policy is primarily concerned with where the interests of others or of this organisation itself are at risk. It may be difficult to decide whether a particular concern should be raised under the whistleblowing policy or under the grievance procedure or under both. If an employee has any doubt as to the correct route to follow, this organisation encourages the concern to be raised under this policy and the Protected Disclosure Coordinator will decide how the concern should be dealt with.

### 1.6 **Protected Disclosure Coordinator**

For the purposes of this policy, and until otherwise decided by the board of directors of Compass, the Protected Disclosure Coordinator will be the Company Secretary.

## Whistleblower Policy and Procedure Flow Chart

### **Compass Employee**

- Code of Conduct
- HR Policies and Procedures
- Employment Contract

