

# LUTRUWITA /TASMANIA MATERIAL INSTITUTE

## WHISTLEBLOWER REPORTING

### Aim

We are committed to the highest standards of conduct and ethical behaviour in all of our business activities and to promoting and supporting a culture of honest and ethical behaviour, compliance and good governance. In line with our [Behaviour Code](#) we expect you to act respectfully, diligently and ethically at all times at, or in connection with work.

We encourage the reporting of any instances of suspected unethical, illegal, fraudulent or adverse conduct involving our business and operations and we provide protections and measures so that those who make a report may do so confidentially and without fear of intimidation, disadvantage or reprisal.

### What is a whistleblower and what is Reportable Conduct?

A whistleblower is someone who makes a disclosure about Reportable Conduct as categorised by Australian Securities & Investments Commission (ASIC) and is therefore entitled to specific legal protections. Reportable Conduct is actual or suspected conduct relating to our business and/or operations that is or may be:

- Corrupt
- Dishonest
- Fraudulent
- Illegal
- in breach of trust or duty
- indicative of gross mismanagement
- the cause of significant financial or reputational loss to the organisation
- negligence that could cause consumer harm.

It is expected that if you become aware of, or suspect on reasonable grounds, actual or potential cases of Reportable Conduct, you will make a report under this policy (or under other applicable policies). The whistleblower protection laws cover you if you are a current or former employee or organisational officer or associate and you report misconduct about the organisation or its managers or other employees. You are also covered if you are a supplier or contractor to our organisation, even though you are not an employee. Your spouse and family members are covered too (collectively 'you').

# LUTRUWITA /TASMANIA MATERIAL INSTITUTE

What should I consider before making a report?

Before you make a whistleblower report, you are encouraged to first consider whether the matter can be more appropriately addressed by:

- speaking with the CEO, other senior staff in our organisation, or our external People & Culture support service; or
- following our [Complaint & Conduct Management](#) reporting guidelines.

Personal work-related grievances are not covered by whistleblower protections. If your report of misconduct is solely about a personal grievance you are having in the workplace, the whistleblower protections in the law won't apply. A personal work-related grievance has implications for you on a personal level but does not have any significant implications for your employer. Examples include, but are not limited to:

- an interpersonal conflict between you and another employee
- a decision relating to your engagement, transfer or promotion
- a decision relating to the terms and conditions of your engagement
- a decision to suspend or terminate your engagement, or otherwise to discipline you.

There may be some personal work-related grievances which do qualify for whistleblower protections. This includes:

- information about misconduct which includes or is accompanied by a personal work related grievance (i.e. a mixed report)
- when the discloser suffers from or is threatened with detriment for making a disclosure
- if the organisation has breached employment or other laws punishable by imprisonment for a period of 12 months or more, or engaged in conduct that represents a threat to the public, or the disclosure relates to information that suggests misconduct beyond the discloser's personal circumstances
- when the discloser seeks legal advice or legal representation about the operation of the whistleblower protections under the Corporations Act.

If your concern is related to a personal grievance or issue not covered by whistleblower protection, please refer to the response and reporting guidelines outlined in our [Complaint & Conduct Management Policy](#).

It is necessary that you provide accurate, honest and truthful information when making a disclosure. There is no requirement that disclosers prove their

# LUTRUWITA /TASMANIA MATERIAL INSTITUTE

allegation/s but they must have been made on reasonable grounds. There is no penalty to a discloser if the allegations are unverified after investigation.

Fake/falsified allegations are a form of misconduct for which there can be disciplinary action. The protections of the Corporations Act do not grant immunity for any misconduct a discloser has engaged in that is revealed via their disclosure.

## Who do I report the activity to?

If you become aware of any issue or behaviour which you consider to be Reportable Conduct, you can make a report via one of the following options listed below.

To ensure appropriate escalation and timely investigation, we recommend that you first consider making any report/s to our Protected Disclosure Officers, listed below:

- Sarah Proud / CEO [sarah.proud@materialinstitute.org](mailto:sarah.proud@materialinstitute.org)
- Jordan Wright / Head of Operations [jordan.wright@materialinstitute.org](mailto:jordan.wright@materialinstitute.org)
- Patrick Kelly / Board Director (contact via YourCall)

You may also raise the matter with a Board Director, or a senior manager in our organisation who makes, or participates in making, decisions that affect the whole, or a substantial part, of the organisation, or who has the capacity to significantly affect our financial standing.

If you are not comfortable or able to report misconduct internally, you may report it to our external and independent whistleblowing service provider. We have contracted with Rely for their Your Call Whistleblowing Solutions (“Your Call”) to receive and manage your report with impartiality and confidentiality. This option allows you to:

- remain completely anonymous, or
- identify yourself to Your Call only, or
- identify yourself to both Your Call and Material Institute.

The Your Call reporting options include:

- Website: [www.yourcall.com.au/materialinstitute](http://www.yourcall.com.au/materialinstitute) (24hrs a day, 7 days a week)
- Telephone: 1300 790 228 (7am and 12am AEST, recognised business days)

Online reports can be made via the website address listed above.

# LUTRUWITA /TASMANIA MATERIAL INSTITUTE

Under this process, Your Call remains the intermediary at all times, receiving and forwarding communication between all parties. The only Material Institute Officers who will have access to your report are the Protected Disclosure Officers listed above. Your Call can also circumvent any of the above Officers upon your request. You will be able to securely upload any relevant documentation and/or material relevant to your disclosure. After making a disclosure, you will be provided with a unique Disclosure Identification Number (DIN) and access to a secure online Message Board.

The Message Board allows ongoing anonymous communication with Your Call and/or Material Institute. Your Call remains the intermediary at all times, receiving and forwarding communication between all parties. The Message Board can be used to receive updates, share further information/evidence and request support or report retaliation. If you cannot access the Message Board, you can contact Your Call via phone (above) for verbal updates.

### **National Relay Service**

If you are deaf, or have a hearing or speech impairment, you can contact Your Call online or through the National Relay Service. Simply choose your contact method at [www.relayservice.gov.au](http://www.relayservice.gov.au) and request Your Call's hotline 1300 790 228. If you have difficulty speaking or understanding English, contact us through the Translating and Interpreting Service (TIS) 131 450 and ask for Your Call on 1300 790 228.

How am I protected if I report activity?

We are committed to ensuring confidentiality and that those who make a report are treated fairly and do not suffer detriment. If you have made a report, are making or considering making a report under this policy you have:

### **Protection against detrimental conduct**

Detrimental treatment includes dismissal, demotion, harassment, discrimination, disciplinary action, bias, threats, intimidation, victimisation or other unfavourable treatment connected with making a report.

If you are subjected to actual or threatened detrimental treatment as a result of having made, making, or considering to make a report under this policy you should:

- inform a Protected Disclosure Officer, or senior role holder, within our organisation immediately, or
- raise it in accordance with the reporting guidelines outlined in this policy.

# LUTRUWITA /TASMANIA MATERIAL INSTITUTE

Actual detriment and threatening to cause detriment are against the law (Corporations Act 1317AC) and may result in personal and / or corporate penalties. It may also be a matter for internal disciplinary action.

A discloser may seek independent legal advice or contact regulatory bodies, such as ASIC, vAPRA or the ATO, if they believe they have suffered detriment. As a discloser, you:

- can choose to remain anonymous while making a disclosure, over the course of an investigation and after an investigation is finalised
- can refuse to answer questions that they feel could reveal your identity at any time, including during follow-up conversations
- should maintain ongoing two-way communication with the entity, so the entity can ask follow-up questions or provide feedback.

#### **Protection of files and records**

All files and records created from an investigation will be retained securely. Unauthorised release of information to someone not involved in the investigation (other than senior managers or directors who need to know to take appropriate action, or for corporate governance purposes) without your consent as a whistleblower will be a breach of this policy.

If you have made a report, you are assured that a release of information in breach of this policy will be regarded as a serious matter and will be dealt with under our disciplinary procedures, outlined in our [Complaint & Conduct Management Policy](#).

Other special protection information can be found here:

- Special Protections under the [Corporations Act](#)
- Special Protections under the [Tax Administration Act](#)

#### **Support**

If you require additional support at any time, please contact our Employee Assistance Program for free, confidential counselling with Converge on 1300 687 327 (1300 OUR EAP) or [www.convergeinternational.com.au](http://www.convergeinternational.com.au)).

#### **Accessibility & Oversight**

This policy is made available:

- Internally via our staff Google Site, as well as during the onboarding process. All new employees are required to familiarise themselves with our organisational policies upon commencement of employment. Employees will also be provided with periodic refresher training.

# LUTRUWITA /TASMANIA MATERIAL INSTITUTE



- Externally via our website; This allows policy access to all former employees, former and current spouses and family members, contractors and suppliers

Related documents

- [Complaint & Conduct Management Policy](#)
- [Behaviour Code](#)

*Response person & role: Sarah Proud (CEO)*

*Approved by board on: November 2025*

*Scheduled review date: November 2026*