
WHISTLEBLOWER POLICY

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DOCUMENT CONTROL

Document Control Information	
Project Name	Whistleblower Policy
Prepared For	PSION Pty Ltd
File Name	Whistleblower Policy
Version	1.2
Status	Final
Reviewed by	Mitchell Meikle – Director Sales, Finance
Review Date	31/10/2025
Prepared By	Sarah Savage – Director HR, Operations

Version	Description	Revised By	Date
1.1	Document Creation	Sarah Savage	
1.2	Document Updates	Sarah Savage	31/10/2025

Document Authorisation	
Name	Sarah Savage
Title	Director HR, Operations
Date	31/10/2025
Signature	S.Savage



CONFIDENTIALITY

PSION classifies this document as “Commercial-in-Confidence”.

The information contained in this document is confidential and proprietary to PSION. PSION holds the understanding that this document will be held in strict confidence and will not be disclosed, duplicated or used, in whole or in part, for any purpose other than its written purpose. Please do not alter or use without the prior written consent of PSION.

DISCLAIMER

PSION will not be liable for any losses, damages, costs or expenses arising out of errors in connection with the incorrect usage of this document, please ensure that you are using the latest document before enacting any information contained therein.

It is your responsibility to ensure you have understood the document in its entirety, and that it is the latest publication. In the event of any discrepancies, incomplete information, or unclear instructions, please contact the document owner.

DO NOT act on any information you believe to be misleading. When in doubt, contact your people manager, the document owner, or [Ethics & Compliance \(ECO\)](#).

DO NOT misrepresent any information contained inside this document. When in doubt, contact your people manager, or [Team & Culture \(HR\)](#).



1 POLICY INTRODUCTION

PSION is committed to adhering to its statutory obligations, its internal policies and values. We are committed to providing employees, contractors and customers of PSION a safe environment to raise breaches of internal policy or Disclosable Conduct.

In cases where people feel they need to be protected in relation to raising a matter, this Policy outlines the protections that will apply.

2 POLICY PURPOSE

The purpose of this Policy is to:

- Explain what can be reported under this Policy
- Demonstrate the importance PSION places on ensuring a safe and supportive environment, and encourage our people to speak up on internal rule breaches and Disclosable Conduct
- Explain the processes for reporting breaches of internal rules or policy, or Disclosable Conduct
- Explain what happens what happens when you make a report
- Outline how you will be protected if you make a report

3 POLICY SCOPE

3.1 PEOPLE

The following people can make a disclosure within PSION:

- An executive leadership team member (past or present)
- An employee (past or present)
- A person who is (or was) a supplier to, or has (or had) a transaction with PSION or a representative of PSION
- An employee (or former employee) of a supplier or person who had such a transaction; or
- A lawyer on behalf of a discloser in one of the above categories

3.2 CONDUCT

The scope of this Policy relates to conduct which:

- Breaches PSION's internal rules and policies; and/or
- Is Disclosable Conduct under the *Fair Work (Registered Organisations) Act 2009* (RO Act) (including alleged reprisals for making a disclosure) as defined in section 6 of the RO Act



3.3 OUT OF SCOPE – COMPLAINTS AND GRIEVANCES

From time to time you may have a Complaint in relation to an incident, policy decisions, or an employment-related grievance with another PSION employee, which is not Disclosable Conduct or a breach of PSION's rules or policies.

If you have a Complaint about the above or you wish to raise a grievance issue, refer to the PSION Grievance Policy or speak to your People Manager, or the relevant Team & Culture (HR) contact person.

4 DEFINING DISCLOSABLE CONDUCT

Disclosable Conduct is defined in section 6 of the RO Act as follows:

DISCLOSABLE CONDUCT means an act or omission that:

- a. contravenes, or may contravene, a provision of this Act, the *Fair Work Act* (FW Act) or the *Competition and Consumer Act 2010*; or
- b. constitutes, or may constitute, an offence against a law of the Commonwealth.

Some examples of Disclosable Conduct include:

- Refusing membership of an organisation when eligible
- Using organisation's resources to favour one candidate over another in an organisation's elections
- Breach of duties as an officer or employee in relation to financial matters
- Coercion to exercise or not exercise a workplace right
- Adverse action due to membership / non-membership of an industrial association
- Breach of right of entry notice requirements
- Dishonest conduct by an employee or officer of PSION

4.1 WHAT IS (AND ISN'T) 'DISCLOSABLE CONDUCT'

As defined above (and in the RO Act) Disclosable Conduct must be a suspected breach of the RO Act, the *Fair Work Act* or the *Competition and Consumer Act 2010*, or criminal offence.

Examples of things which **would** be Disclosable Conduct include:



- A breach of an officer's duties to PSION in relation to financial management
- Providing false or misleading information in a document
- Misuse of PSION's resources
- Unauthorised payments being made
- Election-related offences
- Coercion to exercise or not exercise a workplace right
- Refusing membership to a person entitled to be a member
- Failing to lodge required documents.

However, things that would usually not be Disclosable Conduct include:

- Complaints about the level of service received from PSION or a particular PSION employee
- A difference of opinion about a policy adopted by PSION
- Not being elected as a workplace representative
- Employment disputes with your employer (where your employer is not the registered organisation)
- Disagreeing with the decision of PSION to donate to a particular cause

5 REPORTING DISCLOSABLE CONDUCT

Every person in PSION has a role and responsibility in ensuring PSION is run ethically and in accordance with its internal rules and policies. Where matters related to breaches of internal rules or policies or Disclosable Conduct are identified they should be raised as soon as possible. In instances where a person has concerns about making a report, reports can be made anonymously.

5.1 WHO CAN REPORT A MATTER?

OFFICERS, EMPLOYEES, MEMBERS, SUPPLIERS

All employees, contractors and suppliers are an essential part of reporting matters to PSION.

If you become aware of a matter you should raise it as soon as practical with the people responsible for handling matters, outlined below. Raising your matter early allows it to be addressed in the right way by an



appropriate person. You should not attempt to conduct any investigation yourself before raising the matter as this could interfere with any future actions or, in rare cases, could put your safety at risk.

If you have fears for your wellbeing, safety, or fear of reprisal as a result of raising your matter, you should mention these at the time you report the matter. You will be noted by PSION as a Discloser, and afforded the protections outlined under this Policy, and where eligible legislative disclosure requirements are met, protected under the provisions of the RO Act.

5.2 WHO SHOULD I REPORT MY MATTER TO?

YOUR MANAGER OR THE ETHICS AND COMPLIANCE OFFICER

Sometimes, a suspicion of wrongdoing may arise from a misunderstanding and is not in fact wrongdoing. Accordingly, you are encouraged to check with your People Manager or the [Ethics & Compliance Officer](#) to seek an immediate response. Remember, in some instances, communication is restrained by confidentiality requirements or other legitimate reasons.

TEAM & CULTURE (HR)

If you do not wish to raise the matter with your People Manager or the Ethics and Compliance Officer, you should consider raising the matter with Team & Culture (HR), so they can assist you in relation to your matter.

5.3 WHAT HAPPENS WHEN YOU REPORT DISCLOSABLE CONDUCT

When you report a policy breach or Disclosable Conduct, you should provide as much information as possible.

Information such as dates, times, location, individuals involved, other witnesses, physical evidence (e.g. documents, images) and any other general information may be helpful to assist PSION to determine how to take appropriate action.

Any information you provide to PSION may be used by PSION in assessment of an investigation or other appropriate action. Examples of actions could include:

- A satisfactory explanation can be provided in relation to the matter
- The matter is resolved by speaking to one or more parties



- The matter is recorded and monitored going forward
- A decision is made to investigate (internally or third party)
- The matter is referred to another agency
- A combination of the above.

If PSION determines that your matter should be investigated, the investigation may be conducted by the Ethics and Compliance Officer, Team & Culture (HR), or by an external investigator appointed by PSION.

All investigations will be conducted in a manner that is procedurally fair, confidential, conducted without bias and in a timely manner. At the end of an investigation, you may be informed of the outcome of the investigation by PSION. PSION may in certain circumstances, whether required by law or in its discretion, inform the Fair Work Commission or the relevant authority of any contents of the investigation.

6 HOW YOU ARE PROTECTED

6.1 CONFIDENTIALITY

If you report a breach of internal policy, or a concern relating to Disclosable Conduct to PSION under this Policy, you will have your details, and the information you provide, treated in strictest confidence. PSION will only share your details on a need to know basis with those within PSION who have a role to play in investigating your matter.

In addition, there may be certain times under applicable law where PSION is required to share your details as part of its legal obligations.

6.2 PROTECTION

PSION is committed to ensuring that if you raise a matter under this Policy you are provided support and protection from reprisal or personal or financial disadvantage because of making that report.

You will be protected under the RO Act when you raise a matter relating to Disclosable Conduct within your Organisation, just the same as you would have been if you had raised the Disclosable Conduct with the Commission. This extended protection, is another reason raising matters



within your Organisation in the first instance is usually the quickest and most effective option.

PROTECTION UNDER THE RO ACT

The RO Act provides protection to a person who makes a 'protected disclosure'. A protected disclosure is defined in the RO Act. To qualify as a protected disclosure, the disclosure must:

- be made by a discloser listed in Part 3.1 of this Policy
- be about suspected Disclosable Conduct (i.e. a suspected contravention of relevant Commonwealth laws);
- be capable of being reported to an authorised recipient in a relevant government agency.

Importantly, the RO Act protects an eligible disclosure even if it is reported internally to the registered organisation.

REPRISALS

A discloser is protected from reprisal being taken against them, to their detriment (whether by act or omission), as a result of making that disclosure.

Reprisals may be the subject of criminal penalties, civil penalties or other civil remedies (such as reinstatement, injunctions, etc) if the disclosure is the reason (or part of the reason) for the reprisal action being taken. However, it is important to understand that if a person makes a protected disclosure, they are not exempt from the consequences of their own misconduct.

6.3 ANONYMITY

Anonymous reports of wrongdoing are accepted under this Policy. Anonymous reports may have significant limitations that inhibit a proper and appropriate inquiry or investigation. These limitations may include the inability to provide feedback on the outcome and/or to gather additional particulars.

Anonymous reports can be made to PSION via [PSION ARM \(Anonymous Reporting Mechanism\)](#).



7 FAILURE TO COMPLY WITH THIS POLICY

Any breach of this Policy may result in disciplinary action, including dismissal from PSION.

8 REPORTING DISCLOSABLE CONDUCT TO AN EXTERNAL AGENCY

If your matter relates to Disclosable Conduct and it is not practical (or you are not comfortable) reporting via internal routes in the first instance, you can report Disclosable Conduct to the Fair Work Commission instead.

Fair Work Commission 1300 341 665

The Fair Work Commission are able to receive a disclosure from a whistleblower, triggering the whistleblower process. A whistleblower is also able to give the information to their lawyer and have their lawyer contact the Fair Work Commission with the information.

A person does not need to use the word ‘whistleblower’ to be protected however using it may help the agency receiving the information quickly to recognise the importance of the disclosure.

Note: Employees have no obligation to give the agency their name or contact details, however this can have implications as to whether a disclosure is able to be properly investigated.

9 CONTACT INFORMATION

For further information on the details of this Policy, please contact:

Ethics & Compliance Officer

Ethics.compliance@psion.com.au

Team & Culture (HR)

Team.culture@psion.com.au