

FOR THE VERY BEST

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Greenham

AUSTRALIAN BEEF

**Greenham Group
Whistleblower Policy**

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Greenham

Statement of Intent

AT GREENHAM GROUP OUR MISSION IS, TO:

We exist to bring the very best to beef
Strive to be the BEST, not the biggest
Focus on what our CUSTOMERS need
Lead through Quality & Innovation
Invest in the LONG-TERM
Put OUR PEOPLE first

IN CONDUCTING OURSELVES, WE HAVE FIVE CORE VALUES THAT DRIVE OUR BEHAVIOURS, NAMELY:

DEAL IS A DEAL- We do what we say we will do
SAFETY FIRST & FOREMOST- It's everyone's responsibility
IT FEELS LIKE FAMILY- We have fun & work as a team
BE BOLD- We make it happen rather than waiting for it to happen
STRONGER TOGETHER- We support the communities on which we rely
FROM THE GRASS UP- We always treat our environment and animals with respect

The mission and core values are designed to guide our actions and how we interact with one another on a daily basis and are fundamental to the way we do business.

The Greenham Group Whistleblower Policy provides guidelines and direction regarding the reporting of misconduct or improper activity at all Greenham locations, which may adversely impact the Company. Such breaches may be identified in the Background section of this policy.

By complying with this policy and applying the mission and core values in all we do, we move towards trusted and mutually successful relationships with our customers, suppliers, colleagues, and the community.

Greenham fully expects that all employees are committed to and will uphold the standards and values contained within the Code of Conduct. Compliance with this policy for all employees is a requirement of employment with Greenham and any breach of this policy will be taken seriously, will be investigated and if found, may lead to disciplinary action up to and including termination of employment, depending upon the seriousness of such breach.

For the purposes of this Code, Greenham refers to those companies associated with Greenham Group of Companies, as follows:

HW Greenham & Sons Pty. Ltd.

Greenham Tasmania Pty. Ltd.

Greenham Gippsland Pty. Ltd.

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Whistleblower Policy

As a Greenham employee, you are required to comply with this Code and report any conduct that may be in breach of this Code or any other Greenham Group policy or procedure.

Any reports of a breach will be taken seriously and investigated appropriately by Greenham. These investigations may be conducted internally or by an external third party and will consist of determining the truth and facts. Any intentionally false or malicious report(s) will be dealt seriously with appropriate consequences.

Employees can report any possible breaches:

1. via a portal accessible from the Policies section of the Greenham website, <https://www.greenham.com.au/company-policies.html>

and/or

2. In writing to a Board Member utilising the “Whistleblower Report Form” included in this policy and available on the Greenham website.

Each report shall be taken seriously and will be treated in strictest confidence in accordance with protections provided in the Treasury Laws Amendment (Enhancing Whistleblowers Protections) Act 2019 (Cth) known as the “Whistleblowers Protection Act”.

“Whistleblowers Protection Act” 2019 (Cth)

The purposes of the “Whistleblowers Protection Act” 2019 (Cth) are:

- To encourage and facilitate disclosures of improper conduct by senior managers and others; and
- To provide protection for:
 - persons who make those disclosures; and
 - persons who may suffer reprisals in relation to those disclosures; and
 - to provide for the matters disclosed to be properly investigated and dealt with

The Act excludes disclosures of a personal work / grievance nature, including such matters as interpersonal conflicts, promotions, demotions, terms and conditions of employment disciplinary actions, etc.

These procedures are to be used only when an employee or member of the public wishes to make a disclosure about improper conduct or about detrimental action taken against a whistleblower, and seeks the protections afforded by the Act.

For a disclosure to be a protected disclosure it should be made directly to the Company that it concerns, however, disclosures may also be made directly to relevant external bodies, including Australian Securities and Investments Commission (ASIC), Australian Prudential Regulation Authority (APRA), Australian Federal Police (AFP), a Commonwealth authority prescribed to accept such disclosures or a legal practitioner for the purposes of obtaining legal advice or representation in relation to the relevant disclosure.

Electronic/ Digital Reporting Format

WHISTLEBLOWER REPORT FORM

Please complete the following format for any suspected serious misconduct or any breach or suspected breach of law or regulation that may adversely impact the Company. Please note that you may be called upon to assist in the investigation, if required. Your identity will not be directly disclosed to the alleged suspect, however you can advise of your preparedness to remove anonymity in this matter (Question 8). Alternatively to remain anonymous you do not need to disclose your contact information.

(Prior to completing this form please read the Company's Whistleblower Policy available on this website)

SECTION 1

REPORTER'S CONTACT INFORMATION

(This section may be left blank if the reporter wishes to remain anonymous)

NAME

DESIGNATION

LOCATION / DEPARTMENT

CONTACT NUMBER

E-MAIL ADDRESS *

ALLEGED SUSPECT'S INFORMATION *(this must be completed to proceed with report)*

NAME *

DESIGNATION

LOCATION / DEPARTMENT

CONTACT NUMBER

E-MAIL ADDRESS

#1 WITNESSES'S INFORMATION *(if any witnesses are available)*

NAME

DESIGNATION

LOCATION / DEPARTMENT

CONTACT NUMBER

E-MAIL ADDRESS

#2 WITNESSES'S INFORMATION *(if any witnesses are available)*

NAME

DESIGNATION

LOCATION / DEPARTMENT

CONTACT NUMBER

E-MAIL ADDRESS

#3 WITNESSES'S INFORMATION *(if any witnesses are available)*

NAME

DESIGNATION

LOCATION / DEPARTMENT

CONTACT NUMBER

E-MAIL ADDRESS

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SECTION 2

THE COMPLAINT: Briefly describe the misconduct / improper activity and how you know about it. Please provide as many facts as possible including what, who, when, where and how. If there are multiple allegations, number each allegation sequentially and use as many pages as necessary.

1. What misconduct / improper activity occurred? How do you know this is misconduct / improper activity

2. Who committed the misconduct / improper activity?

3. When did it happen and when did you notice it?

4. Where did it happen?

5. Is there any evidence that you could provide us? Please use the attach file to load attachments

6. Are there any other parties involved other than the suspect stated above?

7. Do you have any other details or information which would assist us in the investigation?

8. Do you give permission remove anonymity and use your name when investigating this matter?

9. Any other comments?

Date:

Signature: (optional if anonymous)

This report must be sent to either of the following options:

1. E-mailed directly to hr@greenham.com.au and/or
2. STRICTLY PRIVATE & CONFIDENTIAL, CEO - Greenham Group of Companies. P.O. Box 1118, South Melbourne, Victoria, 3205.

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General Information

Version No.	<i>V1 – Initial Policy</i>
Approved by	Greenham Group Board
Responsible Policy owner	Group Human Resources Manager
Contact area	Human Resources
Commencement date	1 st January 2019
Date approved	1 st December 2019
Review	Every three years unless required earlier

RELATED COMPANY POLICIES:

Greenham Group Code of Conduct

RELATED LEGISLATION AND REGULATION:

Corporations Act 2001(Cth)

Competition and Consumer Act 2010 (Cth)

Tax Administration Act 1953 (Cth)

Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth)

Treasury Laws Amendment (Enhancing Whistleblowers Protections) Act 2019 (Cth)

Australian Privacy Provisions

Background

From 1 July 2019, Australia will have a new whistleblower protection regime covering the corporate, financial and tax sectors.

The Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 (Act) aims to encourage ethical whistleblowing and discourage white collar crime, while holding employers accountable for protecting eligible whistleblowers.

The Act makes important changes to the Corporations Act 2001 (Cth) and the Taxation Administration Act

1953 (Cth) affecting almost all companies, trading or financial corporations formed within the limits of the Commonwealth, ADIs, NOHCs, super funds, and insurers. As a result Greenham Group of Companies is required to develop and implement a Whistleblower Policy. Under the Act the key reforms include:

- Protected disclosures may relate to matters beyond criminal breaches, including breaches of tax laws, ASIC laws and APRA laws. Conduct that is not illegal but indicates systemic issues will also be disclosable.
- The protections will not extend to disclosures about personal employment or workplace grievances such as interpersonal conflicts, transfer, promotion, or disciplinary decisions.
- More people can be 'eligible whistleblowers', including anyone who has ever been in a relationship with a company (such as former employees, contractors, employees of contractors, associates, and relatives of such individuals).
- More people can be 'eligible recipients' of disclosures.
- Stronger protections for whistleblowers including anonymity, increased immunities against prosecution, and protection against detriment through victimisation.

New penalties will apply to employers who breach those protections, and courts are empowered to make orders for relief against a company if they fail to fulfil a duty of care to protect a whistleblowing employee from detriment.

There are civil penalties under the new laws for breaching confidentiality of an eligible whistleblower's identity or causing or threatening detriment including individual and company penalties.

The Act requires Companies to have a whistleblower policy from 1st January 2020 and a process for reporting any such alleged misconduct and/or improper activity. In addition all employees are required to be trained in either, the process of receiving a disclosure or general training in how the Act works, how to make a disclosure and how a person making a disclosure will be afforded protection under the Act.

End of Policy