



MURRUMBIDGEE IRRIGATION LIMITED WHISTLEBLOWER PROTECTION POLICY & PROCEDURE

Policy Statement

MI is committed to providing a safe and transparent process for Whistleblowers to report instances of corporate misconduct, or an improper state of affairs involving MI as required by governing legislation.

Eligibility

Under the legislation, to qualify for protection disclosures must be made:

- by an *'Eligible Whistleblower'*;
- to a prescribed authority or an *'Eligible Recipient'*; and
- in respect of *'Disclosable Matters'* (ie not a personal complaint, commercial business dispute or work-related grievance).

NB: *'Eligible Whistleblower'*, *'Eligible Recipient'* and *'Disclosable Matters'* are defined by the *Corporations Act 2001* (Cth).

Eligible Disclosure

- **internally** to MI's Legal Advisor (email: whistleblower@mirrigation.com.au or via post: Locked Bag 6010, Hanwood NSW 2680); or
- **externally** to 'Your Call' (via an independent 24/7 online reporting service at <https://www.yourcall.com.au/report> or via phone on 1300 790 228 between 9am and 12am (AEST) on recognised business days).

Anonymity

Information received from the Whistleblower will be treated confidentially, and will not be shared unless:

- the Whistleblower has provided prior consent (in writing wherever possible or required),
- MI is compelled by law to do so, or
- where MI considers it appropriate to make a disclosure to a regulator under legislation.

A Whistleblower may request to remain anonymous or place restrictions on who is informed of their disclosure. Under these circumstances MI will use best endeavours to investigate the disclosure noting practical limitations where the Whistleblower does not agree to share their disclosure or identity.

Investigation process

- Investigations may be conducted internally by MI or externally by an independent service provider.
- All investigations will be conducted without delay and by someone independent and impartial (and never by anyone connected to the subject matter of the disclosure).
- The Whistleblower will be asked whether they wish to remain anonymous before the investigation proceeds.
- The investigator will collect as much information as possible from the Whistleblower and any other relevant witness about the specific allegations and will then put this to the respondent (i.e. the person the complaint is made about).
- The respondent will then be afforded procedural fairness and the opportunity to respond to the allegations.
- At the end of the investigation, the investigator will provide MI's Legal Advisor with a written report that summarises the disclosure, describes the investigation, sets out the findings, and annexes any supporting material.
- MI will then take appropriate action in response to the findings, which may include but is not limited to, disciplinary action, or notification to the appropriate regulatory bodies.

Protections against retaliation

MI does not tolerate victimisation or retaliation against Whistleblowers and will take steps to protect Whistleblowers from retaliation, including (without limitation) protection from adverse action, (such as disciplinary action or termination of employment in the case of employees), harassment or bullying, personal or financial disadvantage, unlawful discrimination, or any other conduct that constitutes retaliation.

A Whistleblower who considers themselves at risk of retaliation can ask MI's Legal Advisor to assist them to take appropriate action or may seek their own independent legal advice.

A Whistleblower who considers that they have been retaliated against or is concerned about how the policy has been applied to their disclosure, should raise this with the Legal Advisor, or with their own independent legal advisor.

Breach of this policy

An individual who is found to have disclosed the information or to have retaliated (or threatened to retaliate) against a Whistleblower may be subject to further action (including disciplinary action in the case of employees). Any individual who breaches the legislation that governs this policy may also be exposed to criminal or civil liability.

Availability and renewal of this policy

This policy will be reviewed at least every two years and will be made available via MI's website.