



# SRJ Technologies Group

## Whistleblower Policy

SRJ-Q-G-PO-D-009

Revision	Issue Date	Revision Details	Author	Checked by	Approved by
U05	13/09/2024	Content updates	JP	SMC	The Board
U04		Same content Board approval	JS	SMC	
U03	23/03/2023	Content Updates	JS	SMC	The Board
U02	18/08/2020	Content Updates	JS & BD	SMC	The Board
U01	11/11/2019	Content	SMC	JS	The Board

## **1. Purpose**

This Whistleblower Policy ("Policy") is designed to encourage, protect, and provide transparency around the process for the disclosure of any misconduct or improper state of affairs within SRJ Technologies Group Plc ("the Company") and its subsidiaries. This Policy aims to align with the requirements of the Corporations Act 2001 (Cth) where applicable for a foreign entity or for the purposes of best practice and other applicable Australian laws, as well as the standards expected of companies listed on the Australian Securities Exchange (ASX).

## **2. Scope**

This Policy applies to all current and former employees, officers, contractors, suppliers, associates, and their family members ("Eligible Whistleblowers"). It covers concerns about any suspected or actual misconduct, illegal activities, or breaches of legal, ethical, or regulatory obligations.

## **3. Reportable Conduct**

Eligible Whistleblowers are encouraged to report conduct that they reasonably believe to be:

- **Illegal activity:** Such as fraud, corruption, theft, bribery, or criminal activity.
- **Breach of legal obligations:** Including breaches of the Corporations Act, Australian Securities and Investments Commission Act, or any other relevant legislation.
- **Misconduct:** Including unethical behaviour, breaches of the Company's Code of Conduct, or serious workplace misconduct.
- **Financial irregularities:** Such as falsification of financial records, improper accounting practices, or misleading financial reporting.
- **Health and safety risks:** Actions that may endanger health and safety in the workplace.
- **Environmental risks:** Conduct that violates environmental regulations or standards.
- **Retaliation:** Any attempt to harass, coerce, or discriminate against a Whistleblower for making a report.

Personal grievances, such as workplace conflicts or dissatisfaction with job conditions, are not considered reportable under this Policy unless they involve a breach of law or are part of broader misconduct.

## **4. How to Make a Disclosure**

Eligible Whistleblowers can make disclosures through any of the following channels:

- **Internal Reporting:** Disclosures may be made to a designated internal officer such as the Company Secretary, Head of HR, or a member of the Audit and Risk Committee.

- External Reporting: Disclosures can also be made to external authorities such as the Australian Securities and Investments Commission (ASIC), Australian Prudential Regulation Authority (APRA), or other regulatory bodies.
- Anonymous Reporting: Whistleblowers may make disclosures anonymously if they prefer. The Company will endeavour to investigate anonymous disclosures in line with the principles set out in this Policy, but anonymity may limit the Company's ability to conduct a full investigation.

## **5. Protections for Whistleblowers**

Eligible Whistleblowers who make disclosures that qualify under this Policy are entitled to the following protections under the Corporations Act:

- Confidentiality: The identity of the Whistleblower will be kept confidential unless required by law. Any information that could identify the Whistleblower will only be disclosed if strictly necessary.
- Protection from Detriment: The Company prohibits any form of retaliation, harassment, or victimization against Whistleblowers. Any employee found engaging in detrimental conduct will face disciplinary action.
- Immunity from Legal Action: Whistleblowers who make disclosures in good faith are protected from civil, criminal, and administrative liability.
- Fair Treatment: The Company will ensure that all persons mentioned in a disclosure are treated fairly, and any investigations will be conducted impartially.

## **6. Investigation of Disclosures**

**Initial Assessment:** Upon receipt of a disclosure, the designated officer will conduct an initial assessment to determine whether the matter qualifies for investigation.

**Investigation Process:** If the disclosure is deemed credible, an independent and thorough investigation will be initiated. The investigation may involve internal resources or external experts, as necessary.

**Reporting on Outcomes:** The outcome of any investigation will be reported to the Whistleblower where possible, provided it does not infringe on the privacy or rights of others involved. Where required, the Board or Audit and Risk Committee will be informed of the results.

## **7. Confidentiality and Record-Keeping**

The Company will maintain records of all disclosures, including details of how each was handled. These records will be kept confidential, and only those with a legitimate need to know will be given access to them.

## **8. Review and Access to the Policy**

This Policy will be reviewed annually to ensure its effectiveness and compliance with legislative changes. It will be made accessible to all employees, contractors, and stakeholders through the Company's intranet and website.

## **9. Consequences of Non-Compliance**

Failure to comply with this Policy may result in disciplinary action, up to and including termination of employment or contracts, and may also result in criminal or civil penalties for individuals involved in misconduct.

## **10. Contact Information**

For further questions or to make a report under this Policy, you can contact:

Whistleblower Protection Officer: Giles Bourne

Email: [giles.bourne@scalarepartners.com](mailto:giles.bourne@scalarepartners.com)

Board Approval: This Policy has been approved by the Board of SRJ Technologies Group Plc and will be reviewed annually to ensure it remains current and effective.

By following the above framework, SRJ Technologies Group Plc aims to promote a culture of openness, transparency, and accountability while providing protection and support for those who raise concerns about misconduct within the organisation.