



Whistleblower Policy

1 Introduction

- 1.1 Aveo's *Code of Conduct; Fraud, Bribery and Corruption Control Framework* and supporting board policies and charters have been developed to ensure high standards of conduct and ethical behaviour in all of our business activities.
- 1.2 The *Whistleblower Policy (Policy)* has been adopted to provide a safe and confidential environment where employees can raise genuine concerns regarding actual or suspected contraventions of our ethical and legal standards without fear of reprisal or discriminatory treatment.

2 Scope of Policy

- 2.1 This Policy applies to all directors, employees and officers of Aveo (including contractors and consultants) regardless of seniority.
- 2.2 All employees are encouraged to report any genuine concerns about any matters or particular behaviour which they believe contravenes Aveo's *Code of Conduct*, other company policies or the law.
- 2.3 Where a concern has been raised in good faith, Aveo will investigate and ensure that any serious misconduct or unethical behaviour that is substantiated is dealt with in an appropriate and timely manner.
- 2.4 Reportable conduct under the Policy includes, but is not limited to:
 - conduct or practices which are illegal or breach any law;
 - dishonest, unethical or corrupt behaviour;
 - payment or receipt of a bribe/inducement;
 - theft, fraud or misappropriation;
 - unsafe work practices, environmental or health risks;
 - abuse of authority; or
 - breach of Aveo's policies and/or *Code of Conduct*.
- 2.5 This Policy should be read in conjunction with Aveo's *Code of Conduct* and *Fraud, Bribery and Corruption Control Handbook*. These documents are available on the company Intranet.
- 2.6 This Policy does not in any way limit, exclude or obfuscate the responsibilities or protections afforded to individuals making a protected disclosure under the *Corporations Act 2001*.

3 Raising Concerns

- 3.1 If employees become aware, either formally or informally, of an actual or suspected contravention of Aveo's ethical standards or legal obligations, they should report it in the first instance to their immediate supervisor or manager.
- 3.2 Where an employee does not feel comfortable reporting their concern to their manager, or where the immediate supervisor or manager is involved in the alleged misconduct, employees may raise their concerns with the Group Head of Audit & Risk.
- 3.3 Individuals wishing to remain anonymous may also elect to report suspected misconduct to the Aveo employee hotline.
- 3.4 Aveo is committed to safeguarding the interests of the whistleblower in accordance with this policy and any applicable legislation, and to make sure the whistleblower is kept informed of the progress of the complaint.

4 Protected Disclosures

- 4.1 Under Australian Commonwealth law, where an individual genuinely believes there has been a breach to the *Corporations Act 2001* and/or *Australian Securities and Investments Commission (ASIC) Act 2001*, that individual is entitled to make a disclosure to the Regulator (ASIC), Aveo's external auditor, a director, senior executive or Authorised Officer of the Company (being the Group Company Secretary or Group Head of Audit & Risk).
- 4.2 Individuals wishing to make a protected disclosure under the *Corporations Act* cannot remain anonymous and must satisfy strict criteria to be afforded certain immunities and protections under the law. It is therefore advised that any employee wishing to make a protected disclosure under statute seek independent legal advice.

5 Investigation of Reports

- 5.1 All reports of alleged misconduct are taken seriously and investigated in a confidential and discreet manner. The investigations process will adhere to the principles of independence, objectivity, confidentiality and natural justice.
- 5.2 Each instance of alleged misconduct will be assessed by an Investigations Officer who is a representative of the Fraud, Bribery and Corruption Control Working Group (being a senior employee from the Internal Audit, Human Resources and Company Secretariat & Compliance departments).
- 5.3 The relevant Investigation Officer will speak to the employee who made the report and may request the report to be provided in writing or ask them to sign a written statement containing all the relevant facts (unless reported anonymously).
- 5.4 Aveo will investigate all reported concerns appropriately and will, where applicable, provide feedback regarding any outcomes of the investigation. Aveo will take the necessary course of action in response to a report and if no action is taken, will provide an appropriate explanation of the outcome to the whistleblower/complainant.

6 Confidentiality and Protection

- 6.1 Information coming into the possession of a person from a whistleblower, the identity of the whistleblower or information which may lead to their identity will not be disclosed to anyone who is not involved in the investigation without the prior consent of the whistleblower, unless obliged to do so by law.
- 6.2 No details of reports made in good faith will be included in the employee's personnel file or performance review.
- 6.3 Where the identity of the whistleblower is known, Aveo will ensure that the employee is kept informed of the actions taken in relation to the report.
- 6.4 Employees will not be discriminated against or disadvantaged in their employment with Aveo as a result of making a report in good faith in accordance with this Policy. Aveo will take all reasonable steps to ensure that adequate and appropriate protection is provided for those who raise concerns in good faith. This protection applies if the matter is proven or not.

7 Malicious Allegations

- 7.1 Where employees are found to have made a report that is malicious, misleading or deliberately untrue, the making of the report will be regarded as misconduct and will be subject to disciplinary action which may include dismissal.

8 Further Information

- 8.1 Employees can access additional information on whistleblowing and Aveo's *Fraud, Bribery and Corruption Control Framework* on the Internal Audit intranet site.

All queries regarding this policy should be directed to the Group Head of Audit & Risk or Group Company Secretary.

This policy was reviewed and updates approved by the Board on 12 February 2018.