

1. OVERVIEW

MEGT is committed to open, honest and responsible business practices. It supports employees that, out of a sense of public duty and personal ethical standards, disclose improper or corrupt behaviour by any MEGT employee, contractor, supplier or client so that it can be investigated.

This policy is designed to complement the normal communications channel between managers and employees. Employees are encouraged to continue to raise appropriate matters at any time with their Manager or General Manager People & Safety.

2. DEFINITIONS

Whistleblower – may be any employee, contractor, former employee or another member of the public.

Whistleblowing – is the disclosure of information by a Whistleblower about any wrongdoing carried out by an individual or group of individuals within an organisation, outside the traditional chain of command.

Wrongdoing – for the purposes of this policy, a wrongdoing can be one or more of the following:-

- Unlawful conduct – this includes conduct or practices that are illegal or breach any law, regulation, code, guideline and other regulatory instruments, e.g. corruption or fraud;
- Conduct that significantly breaches the terms of any contract by which MEGT is bound;
- Misleading or deceptive conduct, including improper or misleading accounting or financial reporting either by, or affecting, MEGT;
- Conduct that is in regular or continuing breach of MEGT policy;
- Misuse of MEGT funds or assets;
- Conduct that jeopardises the health or safety of personnel or of the environment in which they are working or the public generally;
- Wasteful conduct;
- An abuse of authority;
- Suppression or concealment of any information relating to any of the above types of actions.

3. SCOPE

This policy applies to all MEGT employees including casual and sessional staff, apprentices, trainees and contractors.

4. POLICY

4.1 MEGT is committed to maintaining high standards of openness, probity and accountability.

4.2 Any person may make a disclosure about wrongdoing, even if the person cannot identify the person or body to whom or which the disclosure relates.

- 4.3 It is emphasised that this policy is intended to assist individuals who believe, in good faith, that they have discovered wrongdoing. It is not designed to question financial or business decisions taken by MEGT nor does it apply to personal grievances.
- 4.4 Any complaints of injustice in the assessment of an employee's performance or in relation to discrimination, harassment, bullying or disciplinary procedures will be dealt with under the appropriate MEGT policy.
- 4.5 For corporate accountability and transparency it is important that a mechanism is available to enable staff and other persons dealing with MEGT to voice concerns in a responsible and effective manner. This policy is designed to enable employees of MEGT and others to raise concerns internally at a high level and to disclose information that the individual believes show wrongdoing.
- 4.6 MEGT commits to protect Whistleblowers who disclose allegations of wrongdoing relating to MEGT provided disclosure is made:
- in good faith, that is, reasonably believing allegations to be true and without malice;
 - in the reasonable belief that it reflects wrongdoing;
 - to an appropriate person in line with the procedures set out below.

It is important to note that no protection is offered from internal disciplinary procedures to individuals who choose not to use the procedure. In an extreme case malicious or wild allegations could give rise to legal action by the persons complained about.

5. PROCEDURE

- 5.1 Any Whistleblower reporting a wrongdoing, that they reasonably believe to be true, made in good faith and without malice, will be protected by MEGT under this policy.
- 5.2 MEGT will:
- 5.2.1 Notify all staff, by means of this policy, that except as above, no employee of MEGT is to accept information, discuss or make any decision or report on details disclosed by the Whistleblower.
- 5.2.2 Protect the identity of the Whistleblower by not disclosing their name, so long as it does not hinder or frustrate any investigation. If the Whistleblower is implicated in an unlawful act or have themselves seriously breached MEGT policies, MEGT's Chief Executive Officer (CEO) with assistance from the General Manager People & Safety will decide on appropriate action.
- 5.2.3 Protect the Whistleblower as far as possible from any defamation or reprisals.
- 5.2.4 Afford natural justice to the person who is the subject of the disclosure.
- 5.2.5 Thoroughly investigate all allegations and take the most appropriate action. This may include notifying a government body or the police if illegal or criminal behaviour is suspected.
- 5.2.6 Report back to the Whistleblower on the findings of the investigation.
- 5.2.7 Keep written records of the disclosure details, results of the investigation and actions taken.

5.2.8 As far as is reasonably practicable, make every effort to prevent any proven wrongdoing from continuing or recurring.

5.3 Anonymous Allegations

5.3.1 Individuals are encouraged to disclose their name when making allegations of wrongdoing to facilitate a thorough investigation.

5.3.2 Concerns expressed anonymously may still be considered at the discretion of MEGT however they may be viewed as less credible.

5.4 Untrue Allegations

5.4.1 If a Whistleblower makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information.

5.4.2 If an individual makes malicious or vexatious allegations, and particularly if they persist with the allegation, disciplinary action may be taken against that individual/s.

6. RESPONSIBILITIES

6.1 Complaints Officers – Chief Executive Officer (CEO) and General Manager People & Safety

The CEO and General Manager People & Safety, as designated Complaints Officers, will receive disclosures under this policy.

The responsibilities of the Complaints Officer/s are to:

- treat all information disclosed as confidential;
- protect the Whistleblower;
- determine the seriousness of the wrongdoing and act accordingly.

Any disclosure under this policy that is made in relation to the CEO will be referred to the Chairman of the MEGT Board. The Chairman's responsibilities in relation to the disclosure will be the same as those specified for the CEO and General Manager People & Safety in this clause.

6.2 General Manager People & Safety

The General Manager People & Safety, or a People & Safety team member designated by the General Manager People & Safety, is to develop, review, issue, and monitor the effectiveness of this policy.

6.3 Managers

All Managers are to implement and ensure employees understand and comply with the policy.

6.4 Employees

All Employees should understand this policy and have confidence in the process to disclose information about wrongdoing.



7. BREACH OF POLICY

A breach of MEGT's policies may have unintended and harmful consequences. Breaches of this policy may lead to disciplinary action being taken, including dismissal in serious cases.

8. COMMUNICATION

This policy is available on the MEGT Intranet site.

9. REVIEW

This policy will be reviewed every two years or sooner if requested by management

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