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# Whistleblowing Procedure

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**NOTE:** For details on how to access Breight Group's external whistleblower service provider, WBS, please refer to Section 7 of this document.



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## 1 DEFINITIONS AND ABBREVIATIONS

Bright Group	Bright Pty Ltd inclusive of all subsidiary companies of Bright Group.
False Complaint	An unfounded complaint that was known to be false by the Complainant at any stage during the complaints process.
Whistleblowing	The disclosure by or for a witness, of actual or suspected wrongdoing in an organisation that reveals fraud, corruption, illegal activities, gross mismanagement, malpractice, or any other serious wrongdoing”.
Whistleblower	A person who reports serious wrongdoing in accordance with this work procedure.
Whistleblowing Line	<a href="https://www.whistleblowingservice.com.au/bright/">https://www.whistleblowingservice.com.au/bright/</a> Unique Key field ‘Bright’ Client Reference Number field ‘Bright2025’

## 2 REFERENCED DOCUMENT LISTING

BG-COR-POL-003	Code of Conduct
TBC	Managing Performance Procedure
TBC	Grievance Handling Work Procedure

## 3 OVERVIEW

Bright Group (including all subsidiary entities) is committed to fostering a workplace culture where employees, contractors, and stakeholders are encouraged to raise concerns about misconduct, unethical behaviour, bribery, corruption, or any other unacceptable practices—and to do so safely and without fear.

Bright Group recognises that individuals working with or for the organisation are often the first to identify signs that something may be wrong. However, concerns about being perceived as disloyal or fears of victimisation or retaliation can discourage people from speaking up. No individual should be disadvantaged for reporting genuine concerns.

Bright Group is committed to maintaining a safe and supportive environment where legitimate concerns can be raised without fear of reprisal. Individuals who make disclosures in good faith have the right to expect:

- That their identity will be kept confidential, to the extent permitted by law and practical circumstances;
- That they will be protected from any form of retaliation, harassment, or victimisation as a result of making a report;
- That any act of retaliation or reprisal will be treated as serious misconduct and addressed accordingly.
- That they will remain anonymous.

## 4 PURPOSE

The purpose of this procedure is to promote responsible whistleblowing about issues of wrongdoing. It is intended to cover serious concerns that could have large potential impact.

Wrongdoing includes conduct that:

- is fraudulent or corrupt;
- is illegal, such as theft, drug sale or use, violence, harassment, criminal damage to property or other breaches of State, Federal or Territory legislation;



- is unethical, such as acting dishonestly; altering company records; wilfully making false entries in the books and records; engaging in questionable accounting practices; or wilfully breaching *Code of Conduct BG-COR-POL-0005* or other ethical statements;
- is potentially damaging to Bright Group such as maladministration or substantial waste of resources;
- is seriously harmful or potentially seriously harmful to a Bright Group person such as deliberate unsafe work practices or wilful disregard to the safety of others in the workplace;
- is seriously harmful or potentially seriously harmful to the environment;
- may cause serious financial or non-financial loss to Bright Group; or damage its reputation; or be otherwise seriously contrary to Bright Group's interests;
- could be reportable or contrary to Bright Group's quality controls;
- involves any other kind of serious impropriety including retaliatory action against a whistleblower for having made a wrongdoing disclosure.

The exception is where the issue relates to an employee's personal positions, when it would be more appropriate to use the agreed *Grievance Handling Work Procedure* **TBC**.

## **5 SAFETY & CONFIDENTIALITY**

Bright Group acknowledges that raising a concern is often a difficult decision made after careful consideration. Provided the concern is raised in good faith, the whistleblower will not face dismissal, disciplinary action, or any form of retaliation for speaking up—regardless of whether the concern ultimately proves to be unfounded or substantiated.

Bright Group has zero tolerance for harassment or victimisation of individuals who raise genuine concerns. Any such behaviour will be addressed through the company's disciplinary and/or harassment procedures. Where necessary, Bright Group may appoint a representative to support and monitor the welfare of the whistleblower throughout the process.

If an employee deliberately raises a false concern that they know to be untrue, this will be considered misconduct and will be handled in accordance with the *Managing Performance Procedure* **TBC**.

Bright Group understands that whistleblowers may wish to remain anonymous during the initial reporting or throughout the investigation. Every reasonable effort will be made to maintain confidentiality and protect the whistleblower's identity. The company will not disclose a whistleblower's identity without their consent. If it becomes necessary to proceed in a way that could reveal the whistleblower's identity, the investigating officer will discuss this with them and seek agreement on how to proceed.

In rare cases, such as where legal proceedings arise, complete confidentiality may not be possible. Nonetheless, Bright Group will take all possible steps to protect and support the whistleblower.

Anonymous reports will be considered; however, the ability to investigate and resolve the concern may be limited without further information. Whistleblowers are therefore encouraged—where possible—to identify themselves and provide sufficient detail to assist in a thorough investigation.

## **6 REPORTING A CONCERN**

Any employee who wishes to raise a concern is encouraged to:

1. Speak with their Line Manager or submit the concern in writing to them.
2. If, for any reason, it is not appropriate to report the concern to their Line Manager, the employee may instead report it directly to another manager within the Bright Group.



3. If the whistleblower does not wish to report the concern internally or wishes to remain anonymous, they can contact our external whistleblower provider, WBS.

The receiving Line Manager (whether in person or by phone) will:

- Record the key points of the concern.
- Ensure the whistleblower has a copy of this Whistleblowing Procedure.

The Line Manager will then escalate the concern to a member of the Leadership Team.

If the Line Manager believes the concern should be addressed through the grievance procedure instead of the whistleblowing process, they will advise the employee accordingly.

## **7 ANONYMOUS REPORTING**

If the whistleblower does not wish to report the concern to their Line Manager or to be identified, they can contact our external whistleblower provider, WBS.

Anonymous reports have significant limitations that inhibit a proper and appropriate inquiry or investigation. These limitations include the inability to provide feedback on the outcome and/or to gather additional particulars to assist the inquiry/investigation.

Our whistleblower provider is an external 24-hour hotline managed by an external party who is unrelated to Bright Group. The Whistleblowing Line is structured to be independent of Bright Group to enable objective assessment of any disclosures made. WBS are engaged by Bright Group to receive anonymous disclosures of wrongdoing as well as unresolved reports of wrongdoing.

The Whistleblowing Line at WBS may be contacted by:

- Website: <https://www.whistleblowingservice.com.au/bright/>
  - Click on “Making a Report”
  - enter ‘Bright’ in the Unique Key field
  - enter ‘Bright2025’ in the Client Reference Number field
  - Click on next
  - Follow the prompts to complete the report



The whistleblower will be given the opportunity to upload documentation and/or any other evidence that there is to support the claim.

## **8 PROTECTION OF WHISTLEBLOWER**

Bright Group will take all reasonable steps to protect a whistleblower’s identity. However, there may be circumstances where maintaining confidentiality is not practical or legally possible. In general, Bright Group will not disclose a whistleblower’s identity unless:

- The whistleblower provides consent;
- Disclosure is required or authorised by law; or
- Disclosure is necessary to advance the investigation.

When investigating a report of wrongdoing, it may be necessary to disclose details of the concern to individuals involved in the investigation. This can include other Bright Group personnel, external investigators, or—when appropriate—law enforcement agencies. Additionally, the substance of the report may need to be shared with individuals who are the subject of the allegations. While Bright Group



will maintain confidentiality wherever possible, in some cases the identity of the whistleblower may be inferred from the context of the report.

Bright Group is committed to securely storing all records related to whistleblower reports and will ensure that only authorised personnel have access to them. Unauthorised disclosure of:

- Information related to a whistleblower report,
  - The identity of the whistleblower, or
  - Information that could reasonably lead to the identification of the whistleblower,
- will be treated as a serious breach of this procedure and may result in disciplinary action, up to and including dismissal.

It is important to note that whistleblowing does not absolve an individual from liability if they have been involved in the reported wrongdoing. However, their cooperation in reporting and assisting with the investigation may be considered when determining any subsequent action.

## **9 RETALIATION**

Bright Group is committed to protecting and upholding the rights of any employee or individual who raises concerns about wrongdoing in good faith. Bright Group has a zero-tolerance policy for any form of retaliatory action or threats made against a whistleblower, or against their colleagues, employer (in the case of a contractor or supplier), or family members.

Whistleblowers must not be disadvantaged or victimised for raising a concern. This includes—but is not limited to:

- Termination of employment or services
- Demotion or loss of opportunities
- Discrimination or harassment
- Present or future bias
- Threats of any of the above

Any such actions will be regarded as serious misconduct and may lead to disciplinary action, up to and including dismissal.

If a whistleblower believes they have been subjected to retaliation or victimisation—or that such behaviour has been threatened—they are encouraged to report this immediately. Concerns can be raised through the Whistleblowing Line or other designated reporting channels outlined in this Procedure.

## **10 INVESTIGATION OF WRONGDOING ALLEGATIONS**

All reports of alleged or suspected wrongdoing made under this procedure—whether submitted to a Line Manager or via the Whistleblowing Line—will be appropriately assessed.

Where warranted, an independent investigation will be initiated to determine the validity of the concerns raised. The objective of the investigation is to gather evidence that either substantiates or refutes the claims.

An appointed **Investigation Officer** will be responsible for:

- Ensuring the investigation is conducted properly and impartially;
- Keeping the relevant Executive Leadership Team member informed of the investigation's progress.

To maintain integrity and fairness, the investigation will not be led by any individual who:

- Is the subject of the report; or



- Has any actual or perceived conflict of interest or significant connection to the person(s) or practices under investigation.

All investigations must be carried out in a fair, confidential, and independent manner, in accordance with established investigation procedures.

## **11 MANAGEMENT OF A PERSON AGAINST WHOM A REPORT IS MADE**

Bright Group is committed to ensuring that individuals named in a whistleblower report are treated fairly and with due regard throughout the assessment and investigation process.

If a person is named as being suspected of wrongdoing but initial inquiries determine that the suspicion is unfounded and does not warrant a formal investigation:

- The whistleblower will be advised of the outcome.
- The Leadership Team member will determine whether to inform the person named in the report, based on the circumstances and with the aim of preserving individual integrity, promoting workplace harmony, and protecting the whistleblower in the case of a genuine disclosure.

If a formal investigation is undertaken but the allegations are not substantiated:

- The investigation, its findings, and the identity of the person subject to the report must remain confidential, unless disclosure is legally required.

Where an investigation is pursued, the **Investigation Officer** must ensure that the person who is the subject of the report:

- Is informed of the substance of the allegations;
- Is given a reasonable opportunity to respond before the investigation is concluded;
- Is made aware of any adverse comments that may be included in the final report and given an opportunity to respond to them;
- Has their responses fairly reflected in the final investigation report.

Following the conclusion of an investigation, if the individual was made aware of the allegations or the investigation itself, they must be formally advised of the outcome.

Bright Group will provide full support to any individual who is the subject of a report, where it is established that the allegations were clearly unfounded.

In cases where a person is reasonably suspected of serious misconduct, Bright Group may stand the individual down on full pay for the duration of the investigation. If the investigation substantiates the allegations, appropriate disciplinary action will be taken—this may include termination of employment or contract, in accordance with Bright Group's disciplinary procedures.

