

Pace Farm Whistleblower Policy & Procedure



1. Introduction to the Whistleblower Policy

Pace Farm is committed to the highest standards of conduct, ethical behaviour, and sound corporate governance. We do not tolerate improper conduct and are dedicated to fostering a culture of corporate compliance and ethical behaviour. This policy has been established to ensure that all eligible parties who become aware of actual or suspected misconduct, can report it without being subject to victimisation, harassment or discriminatory treatment.

2. The Purpose of this Policy

The Whistleblowing Policy (the Policy) aims to encourage and support the reporting of actual and suspected wrongdoing and misconduct. At Pace Farm, our people are our greatest asset, and we are committed to maintaining the highest standards of ethical behaviour and conduct. This policy outlines our commitment to comply with whistleblower legislation and support and protect our people when they speak up.

3. Who is a Whistleblower?

This policy applies to the Pace Farm Group of entities as defined in the Glossary. It covers all current and former employees, directors (officers), contractors, consultants, suppliers and their employees, as well as the relatives, spouses, and dependents of those individuals (**Eligible Whistleblower**). An Eligible Whistleblower has legal rights under the Corporations Act and other relevant legislation, if they disclose a **Disclosable Matter** (refer paragraph 4.1) to an **Eligible Recipient** or other entity prescribed under the Corporations Act (refer paragraph 5).

4. What Disclosures Are Protected?

4.1. What is a Disclosable Matter?

A disclosure will be a **Disclosable Matter** if an Eligible Whistleblower has reasonable grounds to suspect any misconduct, wrongdoing, or illegal conduct involving Pace Farm. Reportable conduct includes but is not limited to:

- Fraud, theft, or dishonest conduct
- Bribery, corruption, money laundering, or secret commissions
- Illegal, unethical, or improper conduct
- Breaches of employment, labour, or workplace health and safety laws
- Conduct damaging to our reputation or relationships
- Breaches of internal policies
- Any other inappropriate behaviour, misconduct, or improper state of affairs
- Any activity that may cause financial or non-financial loss to Pace Farm or otherwise might be detrimental to the interests of Pace Farm
- Offences punishable by imprisonment for 12 months or more

Document Name	Whistleblower Policy	Effective	July 2024
Policy Owner:	Paola Tornatore	Next review date	July 2025
Document Control No:	NP-HR 001_Whistleblower Policy_v001_31.07.2024	Version No.	1.0
Only electronic copies are controlled copies – uncontrolled once printed			

An Eligible Whistleblower who makes a disclosure must have “reasonable grounds to suspect” the information for it to qualify for protection. This means that if a disclosure turns out to be incorrect, the protections will still apply, provided they had reasonable grounds to suspect. Disclosures that are not about a Disclosable Matter are not covered by this Policy and do not qualify for protection.

4.2. What should not be reported under this Policy

Personal work-related grievances are not considered reportable conduct under this policy. A personal work-related grievance is one that relates to your current or former employment that has implications for you personally but does not have significant implications for Pace Farm Group that do not relate to you. Some examples of matters which should not be reported under this policy include:

- Interpersonal conflict between the discloser and another employee
- A decision to suspend or terminate the engagement of the discloser
- An employee’s dissatisfaction with their pay or failure to receive a promotion (unless the grievance relates directly to discriminatory conduct).

In those circumstances, employees should refer to the **Grievance Policy**.

However, a work-related grievance may still qualify for protection under the law if (for example):

- it is a mixed report that includes information about a Disclosable Matter (as well as a work-related grievance)
- Pace Farm Group has broken Commonwealth laws which are punishable by imprisonment for 12 months or more, or has breached the Corporations Act and/or Tax Act or acted in any way that is a threat to public safety
- the disclosure relates to information that suggests misconduct that goes further than the whistleblower’s personal circumstances
- the whistleblower suffers from or is threatened with detriment for making a disclosure.

5. Speaking Up

If you are an Eligible Whistleblower, and you are aware of actual or suspected Reportable Conduct, we encourage you to speak up to an **Eligible Recipient**. We are committed to fostering a safe speak-up culture and will protect you when you speak up. Your identity and the information you provide will be treated in the strictest of confidence in accordance with this Policy.

5.1. Who to Speak Up To

We encourage reporting via our independent and externally managed Hotline provided by **ER Focus**. Other **Eligible Recipients** include:

- Chief Executive Officer
- Chief People and Safety Officer
- A Director / Board Member of Pace Farm

You can also report to Pace Farm’s auditor (Grant Thornton), or to a member of parliament or journalist in exceptional circumstances in accordance with the whistleblower provisions of the Corporations Act.

Document Name	Whistleblower Policy	Effective	July 2024
Policy Owner:	Paola Tornatore	Next review date	July 2025
Document Control No:	NP-HR 001_Whistleblower Policy_v001_31.07.2024	Version No.	1.0
Only electronic copies are controlled copies – uncontrolled once printed			

5.2. How to Speak Up

You can report Reportable Conduct through the following channels:

- **Web:** 
- **External Reporting –**
 - Email: pacefarmhotline@erfocus.com.au
 - Phone: 0409400118
- **Internal Reporting**
 - Email: confidential@pacefarm.com
 - Post: Chief People Officer, Pace Farm, Locked Bag 800, Rooty Hill NSW 2766

5.3. False reports

An Eligible Whistleblower will still qualify for protection even if their disclosure turns out to be incorrect. However, anyone who knowingly makes a false report of a Disclosable Matter, or who otherwise fails to act honestly with reasonable suspicion in respect of the report may be subject to disciplinary action, including dismissal.

5.4. How Reporters Are Protected

Pace Farm is committed to protecting Eligible Whistleblowers by:

- **Protecting Your Identity:** We will not share your identity, or information that is likely to lead to your identity being known, unless you give your consent, or it's required by law. We will always ask for your consent before disclosing your identity or any information you provide to another party.
- **Ensuring Fairness:** We are committed to ensuring you are treated fairly and that you are not disadvantaged or discriminated against as a result of speaking up. We will assess your report and take all reasonable and appropriate actions to consider, investigate, and resolve the issues raised. Each report will be treated on its own merits in terms of the appropriate action or response, but in all circumstances, we are committed to ensuring fairness to all parties involved.
- **Providing Support:** We understand and acknowledge that speaking up can be difficult, and we are committed to providing support to you and any other impacted party throughout the process. As part of that commitment, you will have access to Pace Farm's Whistleblower Protection Officer (WPO). Our WPO is responsible for ensuring protections under this policy are enforced and maintained.
- **Protection from Retaliation:** We will take all necessary steps to protect you from retaliation, harassment, or adverse employment consequences as a result of making a report. Any form of retaliation against a whistleblower is strictly prohibited and will be subject to disciplinary action.
- **Right to Compensation:** If you suffer loss, damage, or injury because of a disclosure, and Pace Farm failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct, you may be entitled to compensation or other remedies through legal proceedings.

Document Name	Whistleblower Policy	Effective	July 2024
Policy Owner:	Paola Tornatore	Next review date	July 2025
Document Control No:	NP-HR 001_Whistleblower Policy_v001_31.07.2024	Version No.	1.0
Only electronic copies are controlled copies – uncontrolled once printed			

- **Access to Counselling Services:** We will provide access to counselling services to support your emotional and psychological well-being during and after the reporting process.

If you have any questions or concerns regarding the protections that apply to you, and the support being provided, you are encouraged to contact the Whistleblower Hotline via email: pacefarmhotline@erfocus.com.au.

If an Eligible Whistleblower believes they have been subject to detrimental treatment, they should inform an Eligible Recipient immediately.

5.5. Confidentiality and Anonymity

You can choose to remain anonymous or reveal your identity when making a protected disclosure. If you wish to remain anonymous, we encourage you to submit your report via email or post:

- **External Hotline:** pacefarmhotline@erfocus.com.au
- **Internal:** Chief People Officer, Pace Farm, Locked Bag 800, Rooty Hill NSW 2766

If you do not share your identity, Pace Farm will assess your disclosure in the same way as if you had revealed your identity. However, there may be some practical limitations in conducting the investigation without your identity. We therefore do encourage Eligible Whistleblowers to provide their name.

6. Report Handling and Investigation Process

Upon receiving a report of a Disclosable Matter, an Eligible Recipient will assess and document the information securely. Pace Farm will assign the report to the appropriate person for further assessment and potential investigation. The Whistleblower Investigations Officer (WIO) oversees investigations, while the Whistleblower Protection Officer (WPO) ensures protection and support.

- **Initial Assessment:** Upon receipt of a report, our external service provider, ER Focus, will assess the report and obtain as much information as possible. All information will be documented and contained in our secure online reporting platform to ensure confidentiality and identity protection.
- **Assignment and Investigation:** The report will be assigned to the most appropriate person based on the issue raised. The Whistleblower Investigations Officer (WIO) will assess if the report qualifies as a protected disclosure. If an investigation is required, the WIO will oversee or conduct the investigation while the WPO ensures the whistleblower is protected and supported throughout the process.

Where a preliminary investigation determines that the allegations made by the Eligible Whistleblower are baseless or unfounded, then no formal investigation is warranted, and the Eligible Whistleblower, if practicable, will be advised of the outcome and the matter will be closed.

In some instances, reports may not be able to be responded to, for example, because they are anonymous reports.

If an investigation is conducted, it will follow a fair process, be conducted in as timely a manner as the circumstances allow and be independent of the person(s) about whom an allegation has been made.

- **External Investigators:** In some cases, the WIO may appoint an external investigator to conduct the investigation on behalf of Pace Farm. The duration of a formal investigation will

Document Name	Whistleblower Policy	Effective	July 2024
Policy Owner:	Paola Tornatore	Next review date	July 2025
Document Control No:	NP-HR 001_Whistleblower Policy_v001_31.07.2024	Version No.	1.0
Only electronic copies are controlled copies – uncontrolled once printed			

depend on the circumstances, including the number of allegations, witnesses, and other factors.

- **Communication:** You can receive updates, provide more information, and ask questions regarding your report and the investigation by contacting the WIO, WPO, or investigator via the secure online reporting platform. Generally, feedback from the investigation will be subject to any privacy, confidentiality, or legal concerns.

Retaliation against an Eligible Whistleblower (or any member of the investigation team) will not be tolerated.

- **Board reporting** - Where appropriate, the WIO may report findings of an investigation to the Board. The method for documenting and reporting the findings of an investigation will depend on the nature of the disclosure – but may include a summary report of the findings. Any reporting of findings will have regard to applicable confidentiality and anonymity requirements.

7. Fair treatment of others

Pace Farm recognise the importance of balancing the rights of the Eligible Whistleblower and the rights of people against whom a report is made in ensuring fairness.

Fair treatment of those persons implicated in a disclosure includes the opportunity to:

- be ‘heard’ and respond to allegations made against them before any adverse findings are determined;
- the opportunity to have their responses considered by Pace Farm and, in appropriate circumstances, investigated

During any investigation into the report of a Disclosable Matter, Pace Farm extends support and protection to any employees who are implicated in the report until such investigation has concluded and claims have been proven or dismissed.

8. Breach of this Procedure

Whistleblowers must have reasonable grounds for claims made in their disclosures. Any employee found to make a deliberate false claim, or any breach of this Procedure will be taken seriously and may result in counselling and/or disciplinary action, up to and including summary dismissal.

Any victimisation, retaliation or detriment caused or threatened to be caused in reprisal for a report regarding a Disclosable Matter made under this Procedure will be treated as misconduct and may result in disciplinary action, which may include dismissal (or termination of engagement).

Significant penalties may apply to persons who fail to maintain the Whistleblower protections under the Corporations Act or Tax Act. Such fines and associated liability will remain the responsibility of the individual responsible for the breach and will not be paid by Pace Farm.

9. Glossary of Key Terms

- Pace Farm Group includes Alimfresh Pty Ltd ACN 002 831 843, Pace Farm Pty Ltd ACN 003 529 575, Neira Pty Ltd ACN 003 535 920, Pace Farm Egg Products Pty Ltd ACN 003 607 841 and Pace Farm Distribution Pty Ltd ACN 068 240 577
- Eligible Whistleblower: An Eligible Whistleblower is a person who is, or has been, any of the following:

Document Name	Whistleblower Policy	Effective	July 2024
Policy Owner:	Paola Tornatore	Next review date	July 2025
Document Control No:	NP-HR 001_Whistleblower Policy_v001_31.07.2024	Version No.	1.0
Only electronic copies are controlled copies – uncontrolled once printed			

- a current or former officer (director or secretary) or full-time, part-time, fixed term or casual employee (paid or unpaid) of Pace Farm Group
 - a current or former supplier (paid or unpaid) or employee of a supplier of Pace Farm Group (this could include volunteers, contractors, consultants, service providers or business partners)
 - a relative or dependent of a current or former officer, employee, contractor, or supplier of Pace Farm Group
- Eligible Recipient: Individuals who can receive a protected disclosure, including officers, senior managers, WPO, WIO, and external hotline providers.
 - Report: A report of 'reportable conduct' made by an Eligible Whistleblower to an Eligible Recipient.
 - Reportable Conduct: Any illegal, unethical, or improper conduct, or breach of laws or policies, including but not limited to:
 - Illegal, unethical, or improper conduct
 - Dishonest or fraudulent conduct (including bribery and/or corruption)
 - Bullying, harassment, or discrimination
 - A breach of an internal policy
 - An activity that endangers health, safety, or the environment
 - A Whistleblower protection issue
 - Representing a danger to the public or the financial system
 - Any other inappropriate behaviour, misconduct, or improper state of affairs
 - An offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more
 - Prescribed as Reportable Conduct by regulations made for the purposes of Section 1317AA(5) of the Corporations Act 2001
 - An offence against, or a contravention of, a provision of the following legislation:
 - the Corporations Act 2001
 - the ASIC Act 2001
 - the Banking Act 1959
 - the Financial Sector (Collection of Data) Act 2001
 - the Insurance Act 1973
 - the Life Insurance Act 1995
 - the National Consumer Credit Protection Act 2009
 - the Superannuation Industry (Supervision) Act 1993
 - an instrument made under the abovementioned legislation
 - Whistleblower Investigations Officer (WIO): A senior member of Pace Farm who is responsible for assessing, leading, coordinating, or overseeing the investigation of protected whistleblower disclosures in a fair, confidential, objective (without bias), and timely manner.
 - Whistleblower Protection Officer (WPO): A senior member of Pace Farm who is responsible, as far as is reasonably practicable, for protecting whistleblowers and is accountable for the provisions of this Policy.

Document Name	Whistleblower Policy	Effective	July 2024
Policy Owner:	Paola Tornatore	Next review date	July 2025
Document Control No:	NP-HR 001_Whistleblower Policy_v001_31.07.2024	Version No.	1.0
Only electronic copies are controlled copies – uncontrolled once printed			