Mayflower Whistleblower Policy – Corporations Act

POLICY STATEMENT

Mayflower supports eligible whistleblowers under the Corporations Act 2001 and protects qualifying disclosures in accordance with the law.

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1. PURPOSE AND SCOPE

At Mayflower, we take pride in maintaining a culture of transparency and accountability. Our Whistleblower Policy provides a safe and confidential channel for those people who can make disclosures under the Corporations Act 2001 (Cth) (Corporations Act). We believe that by encouraging open communication, we can ensure the highest standards of integrity and ethics within our organisation.

Where you disclose any information to us (in writing or verbally) and you have reasonable grounds to suspect that the information indicates that we may have breached the Corporations Act.

You can make a disclosure anonymously.

2. WHO MAY MAKE A DISCLOSURE

Who can make a whistleblowing disclosure?

You can make a disclosure under the Corporations Act if you are or have been:

- an officer, being a director or company secretary;
- an employee;
- an individual who supplies services or goods, or any employee of such an individual;
- an associate;
- a relative of any individual referred to in paragraphs 2(a) - 2(d) (inclusive);
- a dependent of an individual referred to in paragraphs 2(a) - 2(d) (inclusive).

3. WHO MAY RECEIVE A DISCLOSURE

Who can I make a disclosure to?

If whistleblowers wish to report directly to Mayflower, they are encouraged to contact the Mayflower Executive General Manager Quality and Safety, who is the Whistleblower Protection Officer, or a member of the Mayflower Leadership Team (such as the CEO or any of the Executive General Managers).

If you don't feel comfortable raising an issue with Mayflower directly, or if you're unsatisfied with the way we've handled it, you can make a disclosure directly:

- an officer or senior manager of the Mayflower;
- an auditor, or a member of an audit team conducting an audit, of the Mayflower;
- an actuary of the Mayflower;
- an individual authorised by the registered provider to receive disclosures that may qualify for protection;
- a legal practitioner for the purpose of obtaining legal advice or legal representation;
- ASIC;
- APRA (though we are not in the business of superannuation and so the entity may not deal with the disclosure);
- a Commonwealth authority otherwise prescribed to receive disclosures.

4. HOW TO REPORT — STOPLINE AND MAYFLOWER

Mayflower encourages use of Stopline as an independent reporting channel. Disclosures may also be . made directly to an eligible recipient under the applicable legislation.

- **Stopline telephone**: 1300 30 45 50
- **Stopline email**: makeareport@stopline.com.au
- **Post**: Mayflower c/o Stopline Pty Ltd, PO Box 403, Diamond Creek VIC 3089

When reporting a matter, you generally have 3 options you can choose:

a) Option 1: Anonymous

You may choose to remain completely anonymous to both Stopline and Mayflower. If you choose this option, your identity and contact details will not be disclosed.

To assist with communication while maintaining your anonymity, we strongly recommend creating a secure account through the Stopline portal.

By creating an account, you will be able to securely receive messages, respond to requests for further information, and receive status updates regarding your report, all while remaining anonymous to both Stopline and Mayflower.

If you choose not to create an account, Stopline and Mayflower may be unable to contact you for clarification, provide updates, or obtain additional information that may assist in assessing or investigating your report.

b) Option 2: Stopline Only

Your contact details will be known to Stopline but not Mayflower. If Mayflower wants to provide updates on the status of any investigation, clarify matters you have raised in your report or seek

additional information from you, Mayflower will be able to do so through the Stopline portal while you remain anonymous to Mayflower. If you wish to choose this option, please create an account using the online form. If you do not create an account, neither Stopline nor Mayflower will be able to contact you to provide updates or seek further information in relation to your report.

c) Option 3: Shared

Your identity and contact details will be known to both Stopline and Mayflower. If you agree to share your identity, you may nevertheless decide that your identity only be revealed to the Whistleblower Protection Officer and not to anyone else as part of the investigation.

We respect and appreciate your right to remain anonymous, however we encourage you to provide contact details to Stopline (i.e. you remain anonymous to Mayflower) so that you can be contacted if required and be kept informed of the status of your disclosure.

Privacy Statement: Any personal information collected, used and disclosed by Stopline on your behalf and with your expressed permission is in accordance with the Mayflower Privacy Policy.

5. How Disclosures are Managed

How will we investigate disclosures?

Mayflower will ensure that individuals who are the subject of a disclosure are afforded procedural fairness and natural justice throughout any investigation.

All disclosures will be treated seriously and Investigations may be undertaken internally or by an independent external investigator, depending on the nature of the disclosure and any actual or perceived conflict of interest.

Process:

Disclosure received
↓
Acknowledgement targeted within 2 business days
↓
Initial assessment
↓
Allocation to an impartial investigator where appropriate
↓
Updates where possible
↓
Outcome communication where appropriate
↓
Improvement and monitoring

6. Support, Confidentiality and Protection

How will we support whistleblowers and ensure their fair treatment?

We will support all whistleblowers while a disclosure is being investigated, including by:

- maintaining the confidentiality (and anonymity, where requested) of all whistleblowers, including by:
- redacting relevant information;

- referring to the whistleblower in a gender-neutral context;
- where possible, contacting the whistleblower to help identify certain aspects of their disclosure which may inadvertently identify them; and
- having disclosures handled by qualified and appropriate staff;
- assessing the immediate welfare and protection needs of any whistleblower;
- safeguarding the interests of a whistleblower in accordance with this policy and our obligations under the Corporations Act;
- addressing any issues or concerns of victimisation or threats of victimisation, including by:
- educating and training recipients of disclosures to ensure they can identify victimisation and threats of victimisation;
- taking action, including disciplinary action, against any recipients of disclosures (including staff) engaging in victimisation or threats of victimisation.
- Victimisation and threats of victimisation will not be tolerated.
- Protection from liability
    - Under the Corporations Act, whistleblowers are protected from:
        - any civil, criminal or administrative liability (including disciplinary action) for making a disclosure;
        - any contractual or other kind of remedy being enforced or exercised against the whistleblower on the basis of the disclosure, including termination on the basis that disclosure constitutes breach of the contract; and
- The Corporations Act contains an additional protection so that information in a disclosure is not admissible as evidence against the Whistleblower in criminal proceedings or in proceedings for the imposition of a penalty (other than where the proceedings relate to the falsity of the information).

What to do if you have not been protected under this policy as a whistleblower

Any whistleblowers who have a reasonable belief:

- that they are being victimised or threatened with victimisation as a result of any disclosure (or the belief or suspicion of a disclosure);
- that their confidentiality or anonymity has been breached under this policy; or
- that they have not been afforded any of the protections under this policy,

must report this behaviour to the, Whistleblower Protection Officer - Executive General Manager Quality and Safety and/or Stopline.

7. PUBLIC INTEREST AND EMERGENCY DISCLOSURES

Public interest disclosures

In certain public interest or emergency circumstances a disclosure may be made to a member of Parliament or journalist.

A discloser may wish to contact a legal practitioner to obtain assistance in understanding the criteria for making a public interest or emergency disclosure.

Public interest disclosures may only be made where:

- the whistleblower has already made a disclosure to us that qualifies for protection under the Corporations Act;

- at least 90 days have passed since the disclosure;
- the whistleblower does not have reasonable grounds to believe that action is being, or has been, taken to address the matters in the disclosure;
- the whistleblower has reasonable grounds to believe that making a further disclosure of the information would be in the public interest; and
- after the 90-day period elapses, the whistleblower provides written notice to us that includes information to identify the previous disclosure and states their intention to make a public interest disclosure.

The statutory conditions differ for emergency disclosures. Seek independent legal advice before disclosing to a journalist or parliamentarian.

8. FURTHER INFORMATION

If you require assistance in understanding this policy, please contact the Whistleblower Protection Officer (Executive General Manager – Quality & Safety) or Stopline.

If you require translation of this document in order to understand it, please contact us on info@mayflower.org.au

For further information on how this policy will operate, please contact Executive General Manager Quality & Safety.

Where the concern relates to that officer, use an alternative eligible recipient, including the CEO or Board Chair as appropriate.

9. DOCUMENT INFORMATION

Owner	Executive General Manager – Quality & Safety
Approval authority	Board
Approval date	October 2026
Applicable to	Disclosures under the Corporations Act 2001 (Cth) (*Corporations Act*)
Review Date	October 2028
Owner	Executive General Manager – Quality & Safety