ACN 637 232 752

HR2 Whistleblowing

Thrive Care Group Subsidiaries

This policy is part of Thrive Care Group's (Thrive) comprehensive policy suite, designed to guide and govern operations across all subsidiaries. It establishes a unified framework that ensures consistent standards, accountability, and alignment with Thrive core values and strategic objectives. The policy applies to all employees, contractors, and stakeholders within Thrive and its subsidiaries, supporting seamless governance and compliance throughout the organisation.

HR2 Whistleblowing

Policy Statement

1. Thrive is committed to transparency, accountability, and ethical conduct in its business dealings.

2. Thrive encourages team members and stakeholders to report concerns or suspicions of illegal, unethical or other improper conduct without fear of workplace reprisals where such matters are raised in good faith.

3. This policy outlines the steps available to team members and other stakeholders in reporting such concerns and the business processes for handling these allegations.

Procedures

1. Reporting and investigation of disclosures

   a. Where a team member or stakeholder has reasonable belief that improper conduct has occurred, a disclosure can be made internally to the Head of Human Resources or Chief Executive Officer (CEO).

   b. Any disclosures will be acknowledged within two business days of receipt.

   c. A preliminary review will determine whether an investigation is required, and whether any external reporting obligations apply.

   d. An investigation will be conducted impartially and confidentially, following investigation procedures outlined in the HR7 Disciplinary and Grievance policy.

   e. The CEO will monitor the investigation to ensure confidentiality is maintained and that all documentation and information relating to the report are securely stored and protected.

   f. Findings will be documented and corrective actions taken.

   g. The CEO will present findings and recommendations to the appropriate governing bodies, such as the Board Chair, the NDIS Commission, the Aged Care Quality and Safety Commission, the NSW Ombudsman or the Australia Securities and Investments Commission.

   h. Serious incidents must be reported to relevant regulators within required timeframes which is generally within 24 hours of a responsible person being made aware of the disclosure.

2. Complaints about the Actions of the CEO

    a. Complaints regarding the CEO are made to the Chairperson of the Thrive Board.

    b. If the CEO, a Board member, or a member of the Executive Team is accused of reportable conduct or has a close personal relationship with the person accused, they will be excluded from the reporting and investigation process.

    c. The Chairperson of the Board may appoint an external investigator to complete relevant investigations.

3. Whistleblower Protection System

    a. Thrive has a Whistleblower Protection System in place to ensure the fair, consistent and appropriate management of any concerns relating to improper conduct, and protections for the whistleblower in making any such disclosure.

    b. The Whistleblower Protection System is characterised by the following:

        i. Confidentiality: Thrive Care Group takes all reasonable steps to protect the identity of the whistleblower. Maintaining confidentiality assists in ensuring reprisals are not made against a whistleblower. However, whistleblowers must recognise that anonymity may hinder the investigation of the complaint. Information obtained from a whistleblower will only be disclosed to the extent necessary to conduct an investigation.

        ii. Good Faith: This system is based on people acting in good faith to report concerns that they have reason to believe are true. Disciplinary action may be taken against anyone who makes allegations recklessly, maliciously, or with foreknowledge that the allegations were false

        iii. Non-victimisation of the Whistleblower: Thrive is committed to the protection of genuine whistleblowers against action taken in reprisal for the making of protected disclosures. It is a disciplinary offence for any team member or manager of Thrive to take punitive action against a whistleblower who has reported in good faith or to engage in behaviour which may be deemed as intimidating or coercive. This includes withdrawal of essential resources, workplace ostracism, or any other form of detrimental conduct such as dismissal, demotion, harassment, intimidation, or harm to reputation, financial position, or psychological wellbeing

        iv. Taking Appropriate Action: The CEO ensures disclosures are acted on appropriately and within a reasonable timeframe. The CEO will assess reports and determine whether an investigation is required. If an investigation is deemed necessary, the appropriate individual will be appointed to undertake the investigation, which may involve external professionals where required. The investigator will conduct the investigation fairly, independently, and in a timely manner.

v. Keeping the Whistleblower Informed: Assuming the whistleblower's identity is known, and where appropriate, they will be kept informed at key stages of the investigation, including when the investigation process begins, while it is in progress, and after it is finalised. However, there may be circumstances where details of the outcome cannot be provided

4. Whistleblowers implicated in Improper Conduct

   a. The act of whistleblowing does not shield whistleblowers from the reasonable consequences of any involvement in improper conduct. A person's liability for their own conduct is not affected by their disclosure. However, in some circumstances, an admission may be considered a mitigating factor when determining an appropriate response.

Related Business Procedures

1. HR1 – Code of Conduct Policy
2. HR7 – Disciplinary and Grievance Policy

Responsible Persons

1. The Chief Executive Officer must:

   a. Manage and monitor compliance with this policy.

   b. Support team member competence and compliance with this policy.

   c. Undertake investigations of any disclosures.

   d. Ensure reporting to external agencies is performed within timeframes.

2. Management must:

   a. Manage and monitor compliance with this policy.

   b. Promote reporting culture amongst team members and clients.

   c. Take reasonable steps to prevent any reprisals for disclosure reporting.

3. All Thrive team members must comply with this policy.

Definitions

1. **Reportable conduct:** Any action or behaviour by a team member which represents a significant breach of ethical, legal, or organisational standards. This includes behaviour that is fraudulent, corrupt, unlawful, or otherwise unethical, including conduct that breaches the Code of Conduct. It also includes any behaviour that places the safety of team members, clients, the work environment, or the public at risk. Conduct that causes, or has the potential to cause, financial or non-financial loss to Thrive or to a customer, or that is otherwise detrimental to their interests, is also considered reportable conduct.

2. **Protected Disclosure:** Any good faith communication based on reasonable grounds that discloses or demonstrates an intention to disclose information that may evidence improper conduct.

3. **Team Member**: All Thrive employees, volunteers and subcontractors.

4. **Thrive:** Thrive Care Group Pty Ltd ABN 68 637 232 752, together with each of its subsidiaries.

5. **Whistleblowing:** The deliberate, voluntary disclosure of individual or organisational malpractice by a person who has, or had privileged access to data, events or information about an actual, suspected or anticipated wrongdoing within or by an organisation that is within its ability to control.

6. **Whistleblower**: Any team member, who, whether anonymously or not, makes or attempts to make a disclosure as defined above.

References

1. Aged Care Act 2024 (Cth) and its associated regulations

2. Corporations Act 2001 (Cth)

3. Fair Work Act 2009 (Cth)

4. National Disability Insurance Scheme (NDIS) Practice Standards and their associated regulations

5. NDIS Incident Management and Reportable Incidents Rules 2018

6. NSW Public Interests Disclosures Act 2022

7. Privacy Act 1988 (Cth)

Version Control

Version 1	31 August 2025	New policy creation

Thrive Care Group

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