AJ LUCAS GROUP LIMITED

WHISTLEBLOWER POLICY

AJ Lucas Group Limited (Lucas) is committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.

SCOPE

This policy covers all individuals working at all levels of the company, including directors, employees, officers, consultants, contractors, volunteers, interns, casual workers and agency workers (collectively known as 'staff' in this policy). The policy also covers suppliers as well as relatives, spouses and dependants of the aforementioned categories. This policy does not form part of any employee's contract of employment and we may amend it at any time. The current version of this policy is located on the Company's website and on the Lucas Management System intranet.

WHAT IS WHISTLEBLOWING

Whistleblowing is the reporting of actual or suspected wrongdoing, or dangers in relation to our activities. Wrongdoing includes conduct or a state of affairs (including tax affairs) that is dishonest, fraudulent, corrupt or otherwise constitutes bribery, illegal, in breach of law, unethical, represents a danger to the public or financial system or a breach of the company's code of conduct. Suspected wrongdoing is conduct that there are reasonable ground to suspect is wrongdoing.

AJL is subject to the Corporations Act and Taxation Administration Act and has obligations under those Acts in relation to the receipt and investigation of whistle-blower disclosures. Breach of Lucas's obligations under these Acts may constitute a criminal offence.

HOW TO RAISE A CONCERN

We hope that in many cases you will be able to raise any concerns with your manager. However, where you prefer not to raise it with your manager for any reason, you should contact the Chairman of the Board or the Chairman of the Audit and Risk Committee.

We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

You can also report your disclosure to any of the following:

(a) any officer or senior manager of the Company;
(b) external auditors conducting an audit, of the Company;
(c) a lawyer for the purposes of advice or representation in relation to whistle-blower laws; or
(e) if the disclosure relates to the tax affairs of the Company, a registered tax agent or BAS agent of the Company or the Commissioner of Taxation.

Nothing in this Policy prevents a person from:

(a) reporting misconduct to the ASIC or APRA, or if the disclosure relates to the tax affairs of a Company, the Commissioner of Taxation; or
(b) seeking legal advice on their rights under the whistle-blower laws.

CONFIDENTIALITY

We hope that staff will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will not disclose your identity unless:

(a) you consent;
(b) the Company reports the disclosure to a lawyer for the purposes of obtaining legal advice;
(c) the Company reports the disclosure to ASIC, APRA or the Australian Federal Police;
(d) if the disclosure relates to the tax affairs of a Company, the Company reports the disclosure to the Commissioner of Taxation; or
(e) if the Company is investigating the disclosure, the Company may disclose information that is likely to lead to the identification of you (but not your identity) if it is reasonably necessary to investigate the disclosure.

The Company will take all reasonable steps to reduce the risk the whistle-blower will be identified beyond those involved in investigating your concern.

PROTECTION AND SUPPORT FOR WHISTLE-BLOWERS

We aim to encourage openness and will support whistle-blowers who raise genuine concerns under this policy, even if they turn out to be mistaken. Whistle-blowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the Chairman of the Board or the Chairman of the Audit and Risk Committee immediately.

You must not threaten or retaliate against whistle-blowers in any way. If you are involved in such conduct you may be subject to disciplinary action.

REVIEW

This policy may be subject to periodic review and can only be amended by resolution of the Board.