



EX008 Whistleblower Policy

1 Policy purpose and application

Canterbury is committed to the protection of individuals who disclose information about illegal or improper conduct occurring within Canterbury. This policy has been adopted to provide a safe and confidential environment where such concerns can be raised by whistleblowers without fear of reprisal or detrimental treatment.

This policy sets out:

- who is entitled to protection as a whistleblower;
- the protections whistleblowers are entitled to; and
- how disclosures made by whistleblowers will be handled by Canterbury.

All officers, employees and contractors of Canterbury must comply with this policy.

This policy is available to all officers and employees of Canterbury and displayed in the Corporate Governance section of our website (www.canterbury.com.au).

This policy has been prepared in accordance with the Corporations Act and ASIC Regulatory Guide 270: Whistleblower policies.

2 Scope

This policy applies to whistleblowers, who can be employees and officers as well as others with a connection to Canterbury, such as contractors/suppliers (and their employees) and associates, or a relative, dependent or spouse of these individuals.

Whistleblowers qualify for protection under the Corporations Act if they are an eligible person who has made:

- a disclosure of reportable conduct to an eligible recipient or to ASIC, APRA or another relevant Commonwealth body;
- a disclosure to a legal practitioner for the purposes of obtaining legal advice/representation about the operation of the whistleblower provisions in the Corporations Act (even if the legal practitioner determines that a disclosure does not relate to reportable conduct); or
- an 'emergency disclosure' or a 'public interest disclosure' to a parliamentarian or a journalist in certain circumstances.



It is very important to note that Disclosures that are:

- not about reportable conduct;
 - not made by an eligible person; and
 - not made to an eligible recipient (or other relevant person/entity referred to above),
- do not qualify for protection under the Corporations Act.

This policy also applies to persons associated with disclosures made by whistleblowers, such as those responsible for conducting investigations and those named in a disclosure.

3 Definitions

In this policy, the following terms have the meaning given to them below.

allegation means an allegation of reportable conduct raised in a whistleblower disclosure.

Canterbury Unless otherwise stated, "Canterbury" will mean Canterbury League Club, The Lakemba Club and Moxon Sports Club and its related bodies corporate.

Corporations Act means the *Corporations Act 2001* (Cth).

detrimental conduct means any actual or threatened conduct that could cause a detriment to you (or any other person) as a result of you making a whistleblower disclosure, including:

- termination of employment;
- change of position or duties to your disadvantage;
- harassment, bullying, victimisation or intimidation;
- personal or financial disadvantage;
- unlawful discrimination;
- harm or injury, including psychological harm;
- any damage, including to reputation, property, business or financial position; or
- any other conduct that constitutes retaliation.

EAP means Canterbury's confidential Employee Assistance Program provided by Betsafe.

Eligible Person means an individual who is, or has been, one of the following:

- employee;
- director or company secretary;
- contractor, consultant, supplier, service provider or volunteer (and their employees);
- associate,

of, or working with, Canterbury or a relative, dependent or spouse of one of the above individuals.



eligible recipient means:

- Canterbury's General Manager of Human Resources;
- the company secretary of Canterbury; or
- Canterbury's auditor: or
- Canterbury's external Speak Up Hotline provider, Core Integrity Pty Ltd

personal workplace grievances means a grievance about any matter in relation to an individual's employment or former employment which has, or tends to have, implications only for the individual personally, and where the information does not:

- a) have significant implications to the entity to which it relates, or any other entity, that does not relate to the individual;
- b) concern *whistleblower* victimisation;
- c) concern the following types of misconduct or an improper situation or circumstances:
 - a criminal offence or contravention of the *Corporations Act* or *Australian Securities and Investments Commission Act 2001* (Cth) suspected to have been committed by *Canterbury*, or an *officer* or employee of *Canterbury*.
 - a Commonwealth criminal offence punishable by more than 12 months imprisonment suspected to have been committed by *Canterbury*, or an officer or employee of *Canterbury*.
 - a danger to the public or the financial system posed by *Canterbury*, or an officer or employee of *Canterbury*; or
 - misconduct or an improper state of affairs or circumstances in relation to *Canterbury's tax affairs*, or the *tax affairs* of an *associate* of *Canterbury*.

relative has the same meaning as in the *Corporations Act*.

reportable conduct means any conduct in relation to Canterbury that is:

- fraud, money laundering or misappropriation of funds;
- financially irregular;
- corruption or bribery;
- illegal or a breach of regulatory requirements;
- dishonest or unethical;
- misconduct or an improper state of affairs in relation to Canterbury; or
- a danger, or represents a danger, to public safety or the stability of/confidence in the financial system.

Reportable conduct includes conduct that may not involve contravention of a particular law.



senior manager means any member of the Executive Leadership Team (being those persons, other than a director or company secretary, *Canterbury* considers make, or participate in making, decisions that affect the whole, or substantial part, of the *Canterbury* or have the capacity to affect significantly *Canterbury's* financial standing).

spouse means the married, de facto or registered partner of the individual.

tax affairs means affairs relating to any tax imposed by or under, or assessed or collected under, a law administered by the Australian Commissioner of Taxation.

whistleblower means an eligible person who makes a disclosure of reportable conduct in the manner described in this policy and therefore qualifies for protection as a whistleblower under the Corporations Act.

whistleblower disclosure means a disclosure made by a whistleblower that is being treated in accordance with this policy.

Whistleblower Investigation Officer means a senior manager of Canterbury, currently the General Manager of Human Resources.

Whistleblower Protection Officer means a senior manager of Canterbury, currently the General Manager of Human Resources.

You (including any reference to "you" or "your") means a whistleblower or someone contemplating making a disclosure.

4 What types of matters can be disclosed?

Disclosures can be about improper conduct which you suspect on reasonable grounds has occurred or is occurring within Canterbury, including conduct by an officer or employee of Canterbury. However, disclosures cannot be made under this policy about solely *personal work-related grievances*. Such matters will be dealt with in accordance with *Canterbury's* Grievance Policy (as amended and/or updated from time to time).

A personal work-related grievance may still qualify for protection in some circumstances, such as where the disclosure is mixed with information about misconduct or the discloser is threatened with detriment for making the disclosure.

Examples of disclosable matters include:

- misconduct or an improper situation, or circumstances in relation to Canterbury's:
- tax affairs, or the tax affairs of an associate of Canterbury
- resources and their management

Canterbury

- fraud
- corruption
- bribery
- theft
- violence
- harassment or intimidation of a person or persons
- money laundering
- criminal damage to property
- other breaches of law which affects the business of Canterbury
- conduct that is, or could be a danger to the public (including public health, safety or the environment);
- conduct which amounts to an abuse of authority;
- conduct which may cause financial loss to Canterbury, damage to its reputation, or is otherwise detrimental to Canterbury's interests

engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made, or be planning to make, a disclosure
You must have reasonable grounds to suspect reportable conduct, but you can still qualify for protection even if the disclosure turns out to be incorrect. However, you must not make a report you know is not true, or is misleading. Where it is found that you knowingly made a false report, this will be considered a serious matter that may result in disciplinary action. There may also be legal consequences if you make a knowingly false report.

4.1 Who should I disclose to?

To ensure appropriate escalation and timely investigation of matters under this policy, Canterbury encourages reports to be made in writing or by phone to the "Speak Up" Hotline Service, which is an independent external service operated by Core Integrity on behalf of Canterbury or a Disclosure Coordinator.

The **"Speak Up" Hotline Service** can be contacted by:

Canterbury

Hotline:	1800 324 775 (Standard CI Hotline)
Email:	speakup@coreintegrity.com.au
Post Mail:	PO Box 730 Milsons Point NSW 1565
Landing Page URL:	https://speakup.coreintegrity.com.au/canterburyleague
QR Code:	

Subject to the confidentiality obligations in section 4, the Speak Up operator will provide the details of your disclosure to a Disclosure Coordinator.

Our **Disclosure Coordinators** are:

- the Company Secretary; and/or
- the GM of Human Resources.

Company Secretary 26 Bridge Rd BELMORE NSW 2192 Telephone: +61 2 9704 7700 Email: ceo@canterbury.com.au	GM HR 26 Bridge Rd BELMORE NSW 2192 Telephone: +61 9704 7791 Email: Vpratt@canterbury.com.au
---	---

Alternatively, you can make a disclosure to any one of the following:

- a) a senior manager within Canterbury;
- b) an auditor or member of an audit team conducting an audit on Canterbury; or



- c) if the disclosure concerns Canterbury's tax affairs or the tax affairs of an associate of Canterbury: Canterbury's registered tax agent or BAS agent, or an employee or officer at Canterbury who has functions or duties relating to its tax affairs and who you consider may be assisted in their role by knowing that information.

Eligible recipients can be contacted as follows:

- Canterbury senior managers can be contacted by email (info@canterbury.com.au) or on 9704 7777;
- Canterbury's auditor (currently KPMG) can be contacted on 1800 500 965.

5 Confidentiality

5.1 Whistleblower identity must be kept confidential

Subject to section 4.2, the identity of a whistleblower (or information that is likely to lead to their identity becoming known) must be kept confidential unless the whistleblower has consented to the disclosure.

In order to protect the identity of whistleblowers, Canterbury will take the following steps (among others as necessary):

- personal information or reference to the whistleblower will be redacted or a pseudonym will be used;
- whistleblower disclosures will be handled and investigated by appropriate persons;
- relevant documents will be stored securely;
- access to relevant information will be restricted to those directly involved in managing and investigating the whistleblower disclosure;
- those involved in the managing and investigating the whistleblower disclosure will be reminded of their confidentiality obligations.

5.2 Permitted exceptions

The identity of a whistleblower (or information that is likely to lead to their identity becoming known) may be disclosed without the whistleblower's consent if the disclosure is made to:

- a) an inhouse or external lawyer for the purpose of obtaining legal advice or legal representation in relation to the operation of the Australian whistleblower laws;
- b) the Australian Federal Police;



- c) the Australian Securities and Investments Commission;
- d) the Australian Prudential Regulatory Authority; or
- e) the Australian Commissioner of Taxation if the disclosure concerns Canterbury's tax affairs or the tax affairs of an associate of Canterbury.

5.3 Provision of whistleblower information to a court or tribunal

No person at Canterbury may disclose or produce to a court or tribunal any information or documents which discloses the identity of a whistleblower (or information likely to lead their identity becoming known) without seeking the advice of Canterbury's General Manager of Human Resources.

5.4 Prohibition against detrimental conduct

Canterbury strictly prohibits all forms of detrimental conduct against whistleblowers.

No person at *Canterbury* may cause or threaten any detriment to any person for a reason which includes that they or any other person:

- a) is or proposes to be a *whistleblower*; or
- b) is suspected or believed to be, or could be a, a *whistleblower*.
- c) "**detriment**" includes (but is not limited to):
 - dismissal;
 - injury of an employee in their employment;
 - alteration of an employee's position or duties to their disadvantage;
 - discrimination, harassment or intimidation;
 - harm or injury including psychological harm;
 - damage to property, reputation or business of financial position;
 - taking action against a *whistleblower* to enforce a right (for example, a breach of confidentiality) or subjecting them to any liability or action simply because they have made a disclosure.

However, a whistleblower may be held liable for any personal misconduct revealed by their disclosure or an investigation following a disclosure.

Note that the following actions are not detrimental conduct:

- administrative action that is reasonable for the purpose of protecting a whistleblower from detriment; and
- managing a whistleblower's unsatisfactory work performance, provided the action is consistent with Canterbury's performance management framework.

Canterbury

In order to protect whistleblowers from detrimental conduct, Canterbury will take the following steps (among others as necessary):

- risk assessment of potential detriment to whistleblowers (and others) will commence as soon as possible after receiving a whistleblower disclosure;
- implement actions to prevent detriment where identified in a risk assessment, e.g. allow whistleblower to work from home;
- offer support services;
- intervene if detriment has already occurred, e.g. disciplinary action.

Further to the above, to help protect whistleblowers, you will have access to the assistance of the Whistleblower Protection Officer as provided in this policy. Their role is to:

- seek to protect you from detrimental conduct;
- assist you in maintaining your wellbeing;
- maintain your confidentiality, where relevant, including as required by law;
- review and consider any complaints of detrimental conduct or any concern that your disclosure has not been dealt with in accordance with this policy; and
- escalate any matter they consider appropriate to the FGRC.

5.5 Compensation and other remedies

A whistleblower (or any other employee or person) can seek compensation and other remedies through the courts if:

- they suffer loss, damage or injury because of a whistleblower disclosure; and
- Canterbury failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

5.6 Protection from liability

A whistleblower is protected from the following relation to a whistleblower disclosure:

- civil liability, e.g. legal action against you for breach of employment agreement;
- criminal liability, e.g. attempted prosecution of you for unlawfully releasing information; and
- administrative liability, e.g. disciplinary action.

However, the above protections do not grant immunity for any misconduct you have engaged in that is revealed in your whistleblower disclosure.



5.7 Investigations of information disclosed under this policy

When a disclosure is made which may fall under this policy, the following steps must be followed except where, in the opinion of the Disclosure Coordinator, it would be inappropriate or unreasonable in the circumstances to do so:

- a) any person listed in section 3.1 who receives the information must provide the information to a Disclosure Coordinator as soon as practicable, removing any information which identifies or may identify the discloser of the information (the whistleblower) prior to doing so (unless the whistleblower has provided their consent to that disclosure);
- b) as soon as practicable, the Disclosure Coordinator must determine whether the disclosure falls within the scope of this policy and, if so, appoint an investigator to conduct an investigation into the disclosure.
- c) the investigator must conduct any investigation in an objective and fair manner, and must ensure that any employee who has been adversely mentioned in the disclosure is provided an opportunity to respond to the allegations;
- d) the outcome of the investigation must be reported to the Board or its delegated subcommittee, and may be reported to the whistleblower and any persons affected as the Disclosure Coordinator considers appropriate;
- e) subject to the exceptions allowed under section 4.2 of this policy or otherwise by law, the identity of a whistleblower (or information that is likely to lead to their identity becoming known) must be kept confidential at all times during and after the investigation (including in any reporting to the Board or to any persons affected). All persons involved in an investigation must take all reasonable steps to ensure that a whistleblower will not be identified; and
- f) a whistleblower may raise any concerns or complaints regarding this policy or their treatment with the Disclosure Coordinator at any time.



6 Reporting to the Board or its delegated committee

Subject to the confidentiality obligations in section 4, the Company Secretary will provide the Board or its delegated subcommittee a quarterly report on all material whistleblower matters, including information on:

- a) the status of any investigations underway; and
- b) the outcomes of any investigations completed, and actions taken as a result of those investigations.

The report will include findings on the allegations and a summary of the evidence on which the findings are based. Any report will remain the property of Canterbury and will not be shared with you or any person against whom allegations have been made.

7 Escalations

7.1 Escalations to the Whistleblower Protection Officer

You should immediately inform the Whistleblower Protection Officer if you are concerned that:

- you may be, are being, or have been subjected to detrimental conduct; or
- your disclosure has not been dealt with in accordance with this policy.

The Whistleblower Protection Officer will consider the concerns you have raised and may take such action as the Whistleblower Protection Officer considers appropriate. However, the Whistleblower Protection Officer may not be able to take action if you wish to remain anonymous.

7.2 Escalations to Core Integrity's Faircall Service

You may escalate your concerns directly to Core Integrity if you consider that:

- the Whistleblower Protection Officer has not adequately resolved a complaint regarding detrimental conduct; or
- this policy has not been followed by Canterbury.



You may request that the Whistleblower Protection Officer escalate your concerns to Core Integrity Faircall Service if you are not satisfied with the:

- findings of the investigation; or
- decision of the Whistleblower Investigation Officer not to conduct an investigation.

If you make such a request, you may provide the Whistleblower Protection Officer with a written submission to be sent to Core Integrity Faircall Service setting out your concern. When considering the request, Core Integrity is not required to reopen or reinvestigate the matter.

8 Support

If you are a current or former employee (or an immediate family member), you may access Canterbury's confidential EAP. Current and former employees may also request additional support from the Whistleblower Protection Officer if required.

Canterbury will at all times be able to raise and address with you matters that arise in the ordinary course of your employment or contractual relationship (e.g. any separate performance or misconduct concerns).

Any employee who is the subject of, or mentioned in, a whistleblower disclosure will also be supported and may access the EAP.

9 Reporting to regulators

For the sake of clarity, nothing in this policy is intended to restrict you from disclosing reportable conduct, providing information to, or communicating with a government agency, law enforcement body or a regulator in accordance with any relevant law, regulation or prudential standard applicable in a jurisdiction in which Canterbury operates.

10 Fair treatment of persons mentioned in a disclosure

Canterbury will take all reasonable steps to ensure the fair treatment of individuals who are mentioned in a whistleblower disclosure, including those who are the subject of a disclosure.

Canterbury

In order to ensure this occurs Canterbury will:

- handle disclosures confidentially to the extent it is practical and appropriate to do so;
- assess each disclosure to determine whether an investigation is required;
- conduct investigations in a fair, independent and objective manner;
- conduct investigations to determine whether there is sufficient evidence to substantiate or refute the allegations of reportable conduct; and
- provide all persons involved in investigations with natural justice and procedural fairness.

11 How this policy interacts with Australian whistleblower laws

By making a disclosure in accordance with this policy, you may be afforded protection under *Australian whistleblower laws*.

While this policy principally deals with internal disclosures of information, Australian whistleblower laws also protect some types of disclosure made to external parties (such as to legal representatives, the Australian Securities and Investments Commission (**ASIC**), to the Australian Commissioner of Taxation, members of parliament or journalists). Any person who is a whistleblower under Australian whistleblower laws will be treated in accordance with, and is entitled to, protections afforded by, this policy.

For more information about these laws, see the information available on the ASIC website and the ATO website.

12 Policy review

This policy must be reviewed by the Audit, Risk and Governance Committee at least every 2 years to ensure it is operating effectively. Any recommended changes must be approved by the Board.

The Company Secretary is hereby authorised to make administrative and non-material amendments to this policy provided that any such amendments are notified to the Board or its delegated committee at or before its next meeting.

13 Consequences for non-compliance with policy

Any breach of this policy by an officer, employee or contractor will be taken seriously, and may be the subject of a separate investigation and/or disciplinary action.

Canterbury

A breach of this policy may also amount to a civil or criminal contravention under the Australian whistleblower laws, giving rise to significant penalties.

Document number:	EX008	Version:	4		
Approved by:	Board	Custodian:	Chief Executive Officer		
Created on:	September 2019	Last review:	November 2023	Next review:	Feb 2024