

## WHISTLEBLOWER POLICY

**Delta SBD expects high standards of conduct and ethical behavior in all of our business activities. To ensure that people (all employees and officers of Delta SBD whether full time, part time or casual at any level of seniority wherever employed or contracted) can raise concerns regarding actual or suspected contravention of our ethical and legal standards without fear of reprisal or feeling threatened by doing so.**

- **encourage people to report an issue if they genuinely believe someone has contravened our policies or the law;**
- **outline how Delta SBD will properly deal with all reported misconduct or unethical behavior; and**
- **assist in ensuring that serious misconduct or unethical behavior is identified and dealt with appropriately.**

*All employees are encouraged to report any genuine matters or behaviors that they honestly believe contravene Delta SBD's Code of Conduct, policies or the law. For the purposes of making a report under this Policy, matters may include any actual or suspected:*

- *conduct or practices which are illegal or breach any law;*
- *breach of any of Delta SBD's policies;*
- *corrupt activity, theft, fraud or misappropriation;*
- *abuse of authority or conflict of interest;*
- *serious harm to public health, safety or environment or the health and safety of any Delta SBD's employee; or*
- *any action taken against, or harm suffered by an employee as a result of making report under this Policy.*

*If you become aware of any matter or behavior you think contravenes Delta SBD's Code of Conduct, policies or the law, then you should:*

- *take the matter up with your immediate supervisor or manager;*
- *report the matter to your Human Resources manager, a more senior manager, or the Company Secretary*
- *Where you want to remain anonymous, call the Audit and Compliance Committee Chairperson where you can raise your concerns privately*

*We will investigate all reported concerns appropriately and will, where applicable, provide feedback regarding the investigation's outcome.*

*Your identity and the fact that you have made a report and the contents of the report will be kept confidential and no details of your participation in this process will be included in your personnel file or performance review and you will not be discriminated against or disadvantaged.*

*The report will not be disclosed to anyone except those that are actively involved in investigating the matters raised in the report, and the Audit and Compliance Committee.*

Whistleblowing is not about airing a grievance. It's about reporting real or perceived malpractice. A report may damage the career prospects and reputation of people who are the subject of serious allegations and therefore if your report is not made in good faith or is found to be malicious, deliberately misleading or frivolous, you may be subject to disciplinary action.

Managing Director, DeltaSBD