

Whistleblower Policy – January 2020

Integrity is at the heart of Vaughan Constructions (Vaughan) Values (Our RITES.) It is our aim to conduct ourselves with the highest of integrity in everything we do including the way we deal with our sub-contractors, our suppliers, our clients and each other.

Significant consequences may occur if we don't meet an approximately high standard of integrity and having a transparent and clear whistleblower policy is essential to both good risk management and maintaining high standards of corporate governance.

This policy applies to all, current and former, Vaughan employees including directors, officers, full time, part-time, or casual employees, cadets, contractors, contingent workers and consultants globally, as well as others with a connection to the Vaughan group such as associates, suppliers or service providers and their employees, or a relative or dependant or the spouse of any of these individuals.

Purpose and Protection

Vaughan's Whistleblower Policy is our defence against corporate fraud and wrongdoing. Vaughan encourages our staff and external parties to speak up in confidence if they suspect someone's actions or Vaughan processes are exposing Vaughan to risk - whether that is reputational, ethical, legal or regulatory.

There are several ways in which staff can raise concerns which are set out further below. You may prefer to raise the issue on an anonymous basis, or may be comfortable raising it on a named but confidential basis.

When considering how and on what you want to raise the concern, consider carefully the level of detail Vaughan needs to fully investigate the issue and whether you wish to be informed of any remedial steps taken.

Provided you raise a genuine concern under this Policy and have reasonable grounds to suspect misconduct or an improper state of affairs, you will not suffer any detriment regardless of whether or not your concern is proved to be well-founded following the

BUILDING CUSTOMERS FOR LIFE

ESTABLISHED 1955

Vaughan Constructions Pty. Ltd. ABN 26 004 334 543

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investigation. If any individual is harassed or otherwise victimised after raising a concern, Vaughan will take the appropriate actions.

Please also note that the Corporations Act provides important legal protection for eligible whistleblowers.

Reportable conduct or concerns under this policy

The types of issues that can be raised under this policy are in respect to:

- money laundering
- fraud, bribery or corruption
- breaches of our legal and regulatory obligations
- irregularities involving financial or accounting procedures
- any criminal offence, including theft of proprietary information or property
- conduct which is or may be in conflict with the Company's interests such as involvement with a competitor
- dishonesty or other irregularities in dealing with customers, vendors and other business partners
- illegal payments to government officials or companies
- conduct which endangers the health and safety of employees and others working for Vaughan
- conduct that represents a danger to the public
- soliciting and/or receiving gifts, services or benefits from external parties in excess of \$100 that have not been declared
- providing advantage, or disadvantage as the case may be, in the awarding of consultant, sub contract or supply agreements, or variations to the same, to procure personal gifts, service or benefits from external parties
- conduct that is considered to be a deliberate act that is not for the benefit of the company eg: active absenteeism including falsifying Medical or Annual Leave forms, deliberate non compliance with reasonable instructions from authorised officers or the like

This list is not exhaustive. If you are not certain whether something is unethical, you are encouraged to raise in any event.

Please note that personal work-related grievances do not generally qualify as whistleblower events.

Whistleblower - options for raising an issue

This Policy envisages a number of ways in which you can report a misconduct or concern:

- 1. Human Resources** – where you feel comfortable raising concerns directly, please be assured that you can raise issues on a confidential basis with Human Resources department manager
- 3. Senior management** – you may also raise a concern with a member of senior management, such as a director or a senior manager, who will escalate the issue as appropriate.
- 4. Local Regulator or relevant body** – you can raise concerns direct with the relevant external regulatory authority where you feel that none of the above options will sufficiently address your concern.

What happens when you raise a whistleblowing event?

1. We will investigate
2. We will keep you informed
3. We will report our findings to you (to the extent permitted by law)
4. The Board of Directors will monitor the handling of all whistleblower complaints.

Confidentiality and Zero Tolerance for retaliation

Those who raise a genuine concern under the Whistleblower Policy are not at risk of losing their job or suffering any form of retaliation as a result, if they are genuinely mistaken.

Vaughan will not tolerate the harassment or victimisation of anyone who makes a disclosure where they have reasonable grounds to suspect misconduct or an improper state of affairs.

We recognise that employees or external parties may want to raise a concern anonymously or in confidence. We will protect their identity and will not disclose it without their consent, unless allowed or required by law.

Your experience

This Policy is to encourage and enable staff and external parties to speak up. From time to time, Vaughan may request feedback on your experience to ensure it is achieving its aim of creating a culture of openness, transparency and positive recognition of individuals who raise genuine concerns.

Global applicability

Whilst this policy and the standards contained herein are global, as appropriate, local law will apply to the handling of any particular case.

This policy will be available to all personnel and external stakeholders via our intranet and external website.



Andrew Noble
Managing Director

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