



Whistleblowing Policy and Procedure

1. Purpose

OCS is committed to maintaining the highest level of business ethics and standards of honesty, integrity, openness and accountability, and to ensure full compliance with legal obligations and Corporate Social Responsibility standards. This policy is intended to encourage and allow persons to disclose misconduct; ensure disclosures are properly and lawfully dealt with; support and protect everyone involved in the disclosure from victimisation and retaliation; and ensure the identity of those making a disclosure and the content of the disclosure are kept confidential.

2. Who does this policy apply to?

This policy applies to anyone who has or is working for OCS Group Australia Pty Ltd and OCS Group New Zealand Limited (“OCS”), and OCS subsidiaries, including OCS Services, Midcity Group, 1M Limited and OCS Limited or doing something in connection with their work for OCS. It includes past and current:

- officers and managers
- board members
- employees
- volunteers
- individuals who supply goods and services to us, and, their employees
- work experience students
- commissioned agents and consultants
- a relative of an individual referred to above
- a dependent of an individual referred to above or of such an individual’s spouse (collectively referred to as ‘disclosers’).

Any person defined as a discloser above may make a disclosure under this policy.

3. Reportable Misconduct

If you have seen or have reasonable grounds to suspect misconduct, improper conduct, malpractice or behaviour concerning OCS it should be reported. This policy sets out the method for disclosers to report serious concerns.

Misconduct that should be disclosed under this policy includes but it not limited to:

- Any criminal offence
- Serious breach of our policies and procedures or the law
- Fraud, theft, dishonesty and/or corruption
- Bullying, harassment or discrimination including unacceptable workplace behaviour or conduct prohibited by legislation



- Significant risks to health, safety or the environment
- Causing substantial financial or non-financial loss or detriment to OCS
- Victimising someone for making or involved in a disclosure
- Actions which are intended to conceal any of the above.

4. Personal work-related grievances

Disclosures which are personal work-related grievances and do not include whistleblower conduct matters should be reported following standard OCS reporting processes and should not be reported via the whistleblower policy and channels.

OCS has internal policies and procedures in place to deal with a range of employment related matters including the OCS Workplace Behaviour Policy, the OCS Workplace Discrimination Policy and the Employee Handbook and these should be consulted first when considering a work-related grievance.

5. Making a Disclosure

A disclosure may be made:

- internally to OCS
- to independent whistleblower service provider – Safe Call
- to external authorities and entities

5.1 Making an internal disclosure

We support openness and teamwork. This policy is not intended to replace our first obligation to resolve issues quickly and internally where appropriate. All reasonable attempts to resolve an issue should first be tried. You are encouraged to raise misconduct at any time with your supervisors and managers and to resolve misconduct internally. If you do not feel safe or able to raise misconduct with your supervisor or manager, you may make a disclosure to:

- an officer or senior manager of OCS or related company
- an auditor, or a member of an audit team conducting an audit of OCS
- an actuary of OCS or related company
- a person authorised by OCS to receive disclosures



The OCS ANZ Disclosure Officers to whom you may make a disclosure and their contact details are set out below.

Name and position	Location	Contact details
Gareth Marriott Managing Director - Australia & NZ	ANZ	Mobile AU: +61 402 895 272 Mobile NZ: + 64 27 458 4603 gareth.marriott@ocs.co.nz
Debby Wong Finance Director - Australia & NZ	ANZ	Mobile NZ: + 64 21 980 494 debby.wong@ocs.co.nz
Christine Johnson Company Secretary - Australia & NZ	ANZ	Mobile AU: +61 407 428 785 christine.johnson@ocsservices.com
Jason Fawcett General Manager HSEQ - Australia & NZ	ANZ	Mobile NZ: + 64 21 245 3269 Jason.Fawcett@ocs.co.nz

5.2 Making a disclosure to independent service provider- Safe Call

If for any reason you do not feel safe or able to make a disclosure internally you may do so to our independent whistleblower service provider, Safe Call as part of our “Speak Up” program.

Safe Call operates under a Service Agreement with OCS Globally and acts as the intermediary, providing the means for a whistleblower to retain anonymity. Disclosures received by Safe Call are reported to OCS Group in accordance with this policy. Safe Call also enables us to obtain further information if required and enables the whistleblower to receive updates from us.

The OCS Group Disclosure Officers are the OCS Group General Counsel and OCS Group Director of Human Resources & Corporate Affairs.

Using Safe Call allows you to either:

- remain completely anonymous if you wish
- identify yourself to Safe Call only
- identify yourself to both Safe Call and OCS



There are three Safe Call reporting options available:

1. Telephone

Free Call in New Zealand: 00800 7233 2255

Free Call in Australia: 1800 312 928

Available 24/7, 365 days a year. A translator service is also available if English is not your first language.

2. Website:

<https://www.safecall.co.uk/report>

3. Email:

ocs@safecall.co.uk

In the event a disclosure received by Safe Call relates to a Disclosure Officer, Safe Call will exclude that Disclosure Officer from all communications when providing the disclosure to our organisation. The Disclosure Officers who are not named in the disclosure will then receive and determine how the matter will be addressed or investigated as required. Safe Call remains an independent intermediary at all times and will only communicate with those authorised within our organisation.

5.3 Making a disclosure to external authorities and entities if working in Australia

Concerning misconduct under the Corporations Act:

If the misconduct relates to the Corporations Act 2001 Section 1317AA (1) you may make a disclosure to: ASIC; APRA; or a Commonwealth authority prescribed for the purposes of Section 1317AA (1).

Concerning disclosures made to legal practitioner:

If you make a disclosure to a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to whistleblower protections and confidentiality of a whistleblower's identity, the disclosure will be protected.

Concerning emergency disclosures:

You may also make an emergency disclosure to a member of the Parliament of the Commonwealth, the Parliament of a State or the legislature of a Territory or a journalist if you have reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment and you meet other specific conditions.

5.4 Making a disclosure to external authorities and entities if working in New Zealand

Under the Protected Disclosure Act 2000, protected disclosures can be made to an appropriate authority if you reasonably believe:

- The head of the organisation is involved in the serious wrongdoing
- It is justified because of urgent or exceptional circumstances
- You've made the disclosure in accordance with your organisation's internal procedures, but there's been no action or recommended action within 20 working days.

If you've followed these procedures, there is scope for your protected disclosure to be escalated to an Ombudsman or Minister of the Crown in certain circumstances.

Appropriate authorities include:

- The Ombudsman
- The Commissioner of Police
- The Controller and Auditor-General
- The Director of the Serious Fraud Office
- The Inspector-General of Intelligence and Security
- The Parliamentary Commissioner for the Environment
- The Independent Police Conduct Authority
- The Solicitor-General
- The State Services Commissioner
- The Health and Disability Commissioner
- The head of every public sector agency
- The heads of certain private sector professional bodies with the power to discipline their members

6. Where can I get information and advice?

If you need information and advice about making a disclosure or the support and protection available you may discuss the matter in confidence with your immediate supervisor, manager, HR or a Protected Disclosure Officer as listed above.

Note: In the event you do not formally make a disclosure we may nevertheless be compelled to act on the information provided during the discussion if the information reasonably suggests misconduct has or may occur.

7. Confidentiality and Privacy

OCS will treat disclosures in the strictest confidence. All reports and records relating to a disclosure will be stored securely and are able to be accessed only by authorised staff. The



confidentiality provisions do not preclude anyone involved in the disclosure from sharing the information with their representative or support person.

There is no requirement for a whistleblower to identify themselves in order for a disclosure to qualify for protection.

Your identity will not be disclosed by OCS unless: you consent to disclosing your identity; the disclosure is required by law; and it is necessary to prevent a serious threat to a person's health or safety. Under NZ legislation information that may identify the person making the disclosure may be disclosed if the disclosure is essential to the effective investigation of the allegations.

An unauthorised disclosure of the identity of a whistleblower or information that is likely to lead to the identification of the whistleblower where the information was obtained because of the disclosure, will be regarded as a disciplinary matter and will be dealt with in accordance with the OCS disciplinary procedures and penalties under legislation. In Australia, in certain circumstances, disclosers may also be eligible to claim compensation and remedies under legislation.

8. Protection against victimisation

We will do everything reasonably possible to support and protect anyone who: intends to or actually makes a disclosure; is mentioned in the disclosure; acts as a witness; and otherwise assists with the investigation and resolution of the disclosure from victimisation.

The support may include making available a support person and or other support services as may be appropriate based on the circumstances. As a first step, employees can contact HR or HSEQ or make contact with our Employee Assistance Program providers:

NZ: Contact your manager or the NZ Rehabilitation and Wellbeing Manager (mobile: 021 943 483) who will refer you or you can self-refer to our provider Organisational Counselling Program (OCP) direct 0800 377990

AU: Contact your manager, HR Manager OCS (mobile: 0436 194 320) or Senior HSEQ Advisor (mobile: 0424 026 722) who will refer you or self-refer to our provider Pace National direct 1300 784 094

9. What will OCS do with the disclosure?

The Disclosure Officers have been appointed by OCS to receive the disclosure directly from you (if you make an internal disclosure to OCS) or from Safe Call (if you make an external disclosure to Safe Call).

All discloses made through Safe Call will initially be received by an OCS Group Disclosure Officer within 24 hours of the disclosure being received by Safe Call. The OCS Group Disclosure Officer will acknowledge receipt within 24 hours and carefully assess the information provided to decide on the best action to take, including whether an investigation is required to determine whether the misconduct is proven or not proven. Each disclosure is assessed on a case by case basis and the



OCS Group Disclosure Officer will decide if the disclosure will be passed to an ANZ Disclosure Officer or handled by an OCS Group Disclosure Officer.

The Disclosure Officer will keep the information provided in a confidential and secure system; coordinate and oversee the investigation where an investigator has been appointed; assess the risk of detriment to the discloser or another person as soon as it receives a disclosure; appoint a Protection Officer to support and protect the Whistleblower, if necessary, from victimisation; advise the Whistleblower (through Safe Call where anonymity is requested) of the progress of the matter to the extent it is legally permissible and appropriate to do so; and take all reasonable steps to ensure the identity of the Whistleblower and the person/s who is the subject of the disclosure are kept confidential.

10. What happens if the misconduct is proven?

If the misconduct is proven OCS will decide what action to take including disciplinary action up to dismissal. The disciplinary action will depend on the severity, nature and circumstance of the misconduct.

11. Investigation of the disclosure

The Disclosure Officer will carefully assess and use the information provided in the disclosure to decide the best action to take, including whether an investigation is required and, if so, determine the appropriate investigation process, including: the nature and scope of the investigation; who will conduct the investigation and whether that person should be external to our organisation; the nature of any technical, financial or legal advice that may be required; and a timeframe for the investigation (having regard to the level of risk).

The findings of the investigator will be communicated to the relevant parties involved to the extent that it is legally permissible and appropriate to do so.

12. What are the consequences of making a false disclosure?

Anyone who makes a disclosure knowing it to be false or misleading may be subject to disciplinary action, including dismissal. The disciplinary action will depend on the severity, nature and circumstance of the false disclosure.

13. Report to the Board and OCS Group

The Company Secretary will arrange for a report to the Australian and New Zealand Boards at least quarterly on the disclosures under this policy. Subject to privacy and confidentiality the report will include: a brief description of the disclosures made; the action taken in response to the disclosures made; the outcomes; and the timeframes in resolving/finalising the disclosures.

Additionally, the Board may be called in to review reports on particularly serious whistle-blowing allegations at any stage subject to privacy and confidentiality requirements.



The Company Secretary will provide a monthly report to the OCS Group Disclosure Officers (OCS Group General Counsel and OCS Group Director of Human Resources & Corporate Affairs) of any internal disclosures made via this policy.

14. How will this policy be made available

This policy is available to all OCS employees, officers and potential disclosers on the OCS intranet and external website.

15. Training & Education

OCS will conduct upfront and ongoing education and training on the whistleblower policy and procedures.

16. Review of this Policy

The Company Secretary will monitor and review this policy and procedures annually to ensure it meets its objectives. Any amendments to this policy shall be made known to all OCS employees, officers and potential disclosers by posting an updated version of the policy on the OCS intranet and external website.

17. Relationship to other Policies

This policy forms a part of the OCS risk management system and corporate governance framework; is one of the mechanisms in the OCS risk management tool kit for identifying wrongdoing; is available to all employees as part of their employment information; and should be read in conjunction with the OCS Workplace Behaviour Policy, the OCS Workplace Discrimination Policy and the Employee Handbook.



Document approval

Rev No	Description	Prepared by	Reviewed By	Approved By	Date
0	New	Christine Johnson	Brett Bannister	Brett Bannister	4/11/14
1	Change doc number, remove IPS identifier, change to CEO R2	Christine Johnson	R2 Executive	Jane Sheard	1/1/17
2	Changes to meet new Australian legislation. Changes to allow for a change in WB external provider (Safe Call)	Christine Johnson	<ul style="list-style-type: none">• ANZ Directors• Group Company Secretary• Group Director of HR and Corporate Affairs	Gareth Marriott	18/12/19
3	Minor change to OCS Group Disclosure Officer position. Minor change to EAP contacts AU.	Christine Johnson	Gareth Marriott	Gareth Marriott	25/6/21