

Whistleblower Policy

1. Purpose

Straker Translations Limited (the **Company**) is committed to high standards of conduct and ethical behaviour in our business activities. We promote and support a culture of honesty and good ethical practice, corporate compliance and corporate governance.

The Company encourages the reporting of any instances of suspected unethical, illegal, fraudulent or undesirable conduct involving the Company's businesses. The Company provides protections and measures so that anyone who makes a report may do so confidentially and without fear of intimidation, disadvantage or reprisal.

Conduct that appears illegal, unethical or otherwise improper, should be reported but you may feel apprehensive about raising your concerns because of the fear of possible adverse repercussions to you. This Whistleblower Policy (the **Policy**) aims to make you feel confident about raising concerns internally by offering a reporting and investigative mechanism that is objective, confidential, independent and protects you from reprisal or disadvantage.

2. Scope

The Policy applies to current and former:

- directors and alternate directors;
- officers, employees (including permanent, fixed term, seconded and casual employees) and independent contractors;
- service providers (e.g. auditors, accountants, brokers and consultants) and suppliers (whether paid or unpaid); and
- employees of these service providers or suppliers

of Straker Translations Limited and, if applicable, its subsidiaries (the **Group**).

This Policy covers reports about company wrongdoing, including any conduct by Group entity directors, employees, or contractors deemed unethical, dishonest, improper, illegal or a danger to the public or financial system.

Personal work-related complaints or grievances (e.g. interpersonal conflicts, promotion decisions and disciplinary actions) should be lodged or raised under the Group entity's relevant grievance procedure.

3. Stakeholders and Responsibilities

- The Chief Executive Officer of each Group entity is responsible for fostering a culture of compliance across the Company.
- The Company Secretary has overall responsibility for implementing and reviewing the Policy.
- Subsidiary Boards are accountable for the effectiveness of reporting mechanisms, investigation and actions taken to address the concerns.
- Managers are responsible to provide an overview and a copy of this Policy to new employees at induction.

4. What is Reportable Conduct?

You may make a report under this Policy if you have reasonable grounds to suspect that a director, officer, employee, independent contractor, supplier, tenderer or another person who has business dealings with the Company has engaged in conduct ("Reportable Conduct") which:

- is dishonest, fraudulent or corrupt, including bribery;
- is an illegal activity (such as theft, violence, harassment or intimidation, criminal damage to property or other breaches of law);
- is unethical or in violation of the Company's policies (such as dishonestly altering company records or data, adopting questionable accounting practices or wilfully breaching the Company's Code of Conduct or other policies or procedures);
- conceals Reportable Conduct;
- is potentially damaging to the Company, a Company employee or a third party, such as unsafe work practices, environmental damage, health risks or abuse of the Company's property or resources;
- amounts to an abuse of authority;
- endangers the public or the financial system;
- may cause financial loss to the Company or damage its reputation or be otherwise detrimental to the Company's interests;
- involves serious harassment, discrimination, victimisation or bullying;
- is an offence punishable by imprisonment of 12 months or more; or
- involves any other kind of misconduct or an improper state of affairs or circumstances.

5. Who Can I Make a Report To?

The Company has several channels for making a report if you become aware of any issue or behaviour which you consider to be Reportable Conduct.

To ensure appropriate escalation and timely investigation, we request that reports under this Policy, be made to one of our Whistleblower Protection Officers, which includes:

- any Director of the Company's Board;
- the Company Secretary; or
- the Company's auditors.

Reports should be marked to the attention of the Whistleblower Protection Officer. Reports can be mailed to the Company's registered office. For further contact details refer to the Company's website.

The report may also be made to the following external people or bodies:

- the Company's external auditor; or
- an appropriate authority (in certain circumstances).

You may report anonymously.

6. Investigation of Reportable Conduct

We investigate and record all reports fairly, objectively and confidentially. The Company will investigate all matters reported under this Policy as soon as practicable after the issue has been reported. A Whistleblower Protection Officer may, with your consent, appoint a person to assist in the investigation of a report.

The particular investigation process and enquiries adopted will be determined by the nature and substance of the report. Shortly after receipt of the report, the Whistleblower Protection Officer or investigator will discuss the investigation procedure with you.

Where a report is submitted anonymously, the Company will conduct the investigation and its enquiries based on the information provided to it.

7. What Information do I Need to Provide in my Report?

For a report to be investigated, it must contain enough information to form a reasonable basis for investigation. It's important, therefore, that you provide as much information as possible. This includes any known details about the events underlying the report, including:

- date;
- time;
- location;
- name of the person(s) involved;
- possible witnesses to the events; and
- other evidence of the events (e.g. documents, emails).

In your report, describe any steps you have taken previously to report the matter elsewhere or resolve the concern.

If a report does not contain sufficient information to form a reasonable basis for investigation, the investigator will request additional information from you. If this additional information is not able to be obtained, and the investigation is unable to be completed, then the report will be closed, and you will be informed.

8. How long will the investigation take?

The investigation process will vary depending on the nature of the Reportable Conduct and the amount of information provided. The investigator aims to conclude the investigation within six (6) weeks of the report.

If the report raises complex issues and the investigator considers it impossible to conclude the investigation within six (6) weeks, an attempt will be made to notify the individual who reported the concern of the expected investigation timeframe.

If there is insufficient information to warrant further investigation, or the initial investigation immediately identifies there is no case to answer, the investigator will notify you at the earliest possible opportunity.

9. How will I receive feedback on my investigation?

The investigator assigned to handle your Whistleblower report will tell you the outcome of the investigation unless prevented by law from doing so.

The investigator also notifies the Company's Board of Directors (Company's Board) of the outcome of the investigation. Potential outcomes include:

- your concern was substantiated, and appropriate action has been taken;
- your concern was not substantiated, and no further action will be taken unless further evidence becomes available;
- a determination was not possible, and no further action will be taken unless further evidence becomes available; and
- you may be provided with further feedback, subject to the privacy and confidentiality rights of any individual under investigation and any other confidentiality requirements.

10. What happens if the concern is substantiated?

Where the investigator substantiates the report, the Company will consider whether changes to internal processes and systems are required to reduce the likelihood of the Reportable Conduct happening again. Where a person is found to have engaged in misconduct, the matter will be dealt with under the Company's disciplinary procedures. This may result in disciplinary action, including dismissal.

Criminal matters will be reported to the police or other appropriate regulatory authorities.

11. What if I am not satisfied?

If you believe that your report was not dealt with according to this Policy, or are dissatisfied with the investigation outcome, then you may escalate the matter to the Chair of the Board.

12. Protection of Whistleblowers

The Company is committed to ensuring confidentiality in respect of all matters raised under this Policy, and that those who make a report are treated fairly and do not suffer detriment. The Company will safeguard your interest, having regard to this Policy, the Protected Disclosures Act 2000 and any other applicable policies and laws.

In particular, a person who makes a protected disclosure under the Protected Disclosures Act 2000 is not liable to any civil or criminal proceeding or to a disciplinary proceeding by reason of having made or referred that disclosure of information.

12.1 Protection against retaliatory action

Retaliatory action includes dismissal, demotion, harassment, discrimination, disciplinary action, bias, threats or other unfavourable treatment connected with making a report. If you are subjected to detrimental treatment as a result of making a report under this Policy, you should inform a Whistleblower Protection Officer.

If you suffer any undue loss connected with making a report under this Policy, the Company shall after making appropriate enquiries / investigations, compensate you or provide another appropriate remedy.

You may seek independent legal advice if you believe that you have suffered retaliatory action.

If your report was a protected disclosure, you also have the right to raise a personal grievance with the Company.

You will be protected under this policy when you make a disclosure of a Reportable Conduct even if the investigation rules that your concern was not substantiated or if a determination was not possible.

12.2 Protection of your identity and confidentiality

Upon receiving a report under this Policy, the Company will only share your status as a Whistleblower or information likely to reveal your identity if:

- a. you consent in writing;
- b. a person with knowledge of the report reasonably believes that disclosure of identifying information:
 - i. is essential to the effective investigation of the allegations in the report; or
 - ii. is essential to prevent serious risk to public health or public safety or the environment; or
 - iii. is essential having regard to the principles of natural justice.

The Company will otherwise use its best endeavours not to disclose this information.

Whistleblowers are assured that a release of information in breach of this Policy will be regarded as a serious matter and dealt with under the Company's disciplinary procedures. Any disclosures of your identity or information likely to reveal your identity will only be made on a strictly confidential basis.

12.3 Protection of files and records

All files and documents created from an investigation will be retained securely.

The unauthorised release of information to someone not involved in the investigation (other than senior managers or directors) without your consent as a Whistleblower will be a breach of this Policy.

13. Duties of employees concerning reportable conduct

It is expected that employees of the Company who become aware of actual, suspected or potential cases of Reportable Conduct will make a report under this Policy or under other applicable policies.

14. Reporting procedures

The Whistleblower Protection Officer will report to the Company's Board on the number and type of Whistleblower incident reports. These reports will be made on a 'no names' basis, maintaining the confidentiality of matters raised under this Policy.

The Company's Board will receive copies of all Whistleblower reports from the Whistleblower Protection Officer (with identifying details redacted). In addition, serious or material Reportable Conduct will be considered by the Whistleblower Protection Officer for immediate referral to the Chair of the Board.

15. False reporting

A false report of a reportable matter could significantly affect the Company's reputation and the reputations of Officers and other staff members and could also cause considerable misuse of time and effort. Any deliberately false reporting of a Reportable Conduct, whether under this Policy or otherwise, will be treated as a serious disciplinary matter.

16. Questions

Any questions about this Policy should be directed to the Whistleblower Protection Officer.

17. Statutory protections

All reports of Reportable Conduct are protected under this Policy.

Reports by employees of the Company will also be protected under the Protected Disclosures Act 2000 where:

- a. the information is about serious wrongdoing in or by the Company that:
 - i. poses a serious risk to public health, public safety or the environment; or
 - ii. poses a serious risk to the maintenance of law, including the investigation of and detection of offences; or
 - iii. is an offence; and
- b. you believe on reasonable grounds that the information in your report is true or likely to be true; and
- c. you wish to disclose the information so that the serious wrongdoing can be investigated; and
- d. you wish the disclosure to be protected.

If you are an employee of the Company and are unsure about whether or how you can make a report that is a protected disclosure, you can seek information and guidance from the Ombudsman.

18. Policy review process

The Company Secretary is responsible for reviewing the effectiveness of this Policy, including key protections and support to disclosers, on an annual basis. Amendments to this Policy require approval from the Chief Executive Officer and the Company's Board.

Last review date: May 2020