



HIAPL Whistleblower Policy

Table of Contents

1.	Purpose of Policy	2
2.	Application	2
3.	What is Reportable Conduct?	2
4.	Making a Report	3
5.	Reporting Channels.....	3
6.	Investigation of Reportable Conduct	5
7.	Protection of Whistleblowers	5
8.	How this policy is to be made available to officers and employees.....	8

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1. Purpose of Policy

Hobart International Airport Pty Ltd (**HIAPL, we, us**) is committed to the highest standards of conduct and ethical behaviour in all of our business activities, and to promoting and supporting a culture of honest and ethical behaviour, corporate compliance and good corporate governance.

This policy is therefore of strong significance to HIAPL's continuing culture of encouraging those who are aware of wrongdoing to speak to the right people about the things they are aware of.

HIAPL encourages the reporting of any instances of suspected unethical, illegal, fraudulent or undesirable conduct involving HIAPL's business, and will ensure that those persons who make a report are not subject to intimidation, disadvantage or reprisal.

Further, HIAPL encourages and supports the protection of individuals who make, or intend to make, similar disclosures about entities other than HIAPL. To the extent possible, this policy will apply to HIAPL's protection of such individuals.

2. Application

The policy applies to all HIAPL's directors, employees, temporary staff (including secondees), contractors, brokers, service providers (e.g. auditors, accountants and consultants), suppliers and former employees and any other people specified at law (**Affected Persons**). It also applies to relatives of Affected Persons.

HIAPL encourages anyone with knowledge or reasonable suspicion of Reportable Conduct (see section 3) to report it as soon as possible.

In this document "you" refers to anyone making a report under this policy.

3. What is Reportable Conduct?

You may make a report under this policy if you believe that a HIAPL director, officer, employee, contractor, supplier, tenderer or other person who has business dealings with HIAPL has engaged in conduct (Reportable Conduct) which:

- (a) involves harassment, discrimination, victimisation or bullying;
- (b) is potentially damaging to the environment, or the health and safety of any person;
- (c) amounts to an abuse of authority;
- (d) is dishonest, fraudulent or corrupt (including bribery);
- (e) is illegal (such as theft, drug sale or use, violence, harassment or intimidation, criminal damage to property or other breaches of law);
- (f) is unethical (such as dishonestly altering company records or data or adopting questionable accounting practices);
- (g) may cause financial loss to HIAPL or damage its reputation or be otherwise detrimental to HIAPL's interests;



- (h) involves any other kind of serious impropriety; or
- (i) involves concealing Reportable Conduct.

Reportable Conduct does not include conduct which is characterised as merely inappropriate, or which relates to personal employment grievances. Such matters are addressed under HIAPL's other related policies. Disclosures relating to these matters do not qualify for the protective measures referred to under this policy.

4. Making a Report

All reports must be made with a genuine and reasonable belief regarding the Reportable Conduct.

Reports may be made verbally or in writing to a person who is eligible to receive such reports (a non-exhaustive list is provided in section 5 of this policy) and may be made by you at any time.

You are requested to inform the recipient that you are making a report under this policy, providing as much information as possible and any known details about the events underlying the report (e.g. date, time, location, name of person(s) involved, possible witnesses to the events, evidence of the events (e.g. documents, emails) and steps you may have already taken to report the matter elsewhere or to try resolve the concern).

Nothing in this policy is intended to restrict you from disclosing Reportable Conduct or providing any information to ASIC, the Australian Prudential Regulation Authority (APRA), the Australian Federal Police (AFP), the Commissioner of Taxation under the Taxation Act or another Commonwealth body prescribed by regulation or to a legal practitioner to obtain legal advice about the whistleblower provisions. You should note that if you make a disclosure to a legal practitioner in order to obtain legal advice, the legal practitioner is obligated to ensure that your disclosure is protected, even in circumstances where the legal practitioner concludes that the disclosure does not relate to a disclosable matter.

5. Reporting Channels

HIAPL has several channels for making a report regarding Reportable Conduct. Eligible recipients for a report include those recipients that are listed and described below. You should note that this list does not in any way restrict or diminish the list of eligible recipients specified under legislation or otherwise at law.



5.1 Supervisor or Manager

You may raise the matter with your immediate supervisor, manager or another senior manager.

The supervisor must take the matter to a Protected Disclosure Officer (see section 5.2) or a senior executive, in accordance with the protocols regarding confidentiality set out in section 7 below.

5.2 Protected Disclosure Officers

Any person may make a report to any of the following Protected Disclosure Officers (or, if that person is no longer in the role listed, the person who is acting in the position designated) using the contact methods designated below:

Position	Name	Contact Details
Chairperson	Richard England	Phone: 0419 806 674 Email: richard@rafengland.com.au
CEO	Norris Carter	Phone: 0424 635 414 Email: ncarter@hobartairport.com.au
Chairperson Audit and Risk Committee	Jeff Pollock	Phone: 0422 233 461 Email: jeff.pollock@avocaadvisors.com
General Counsel and Company Secretary	Nathaniel Flinn	Phone: 0436 421 767 Email: nflinn@hobartairport.com.au
Airport Chaplain		Phone: 0455 840 050 Email: chaplain@hobartairport.com.au

Protected Disclosures can also be made to:

- a statutory officer of HIAPL or any member of HIAPL's internal audit team, if so appointed;
- a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions in the Corporations Act;
- ASIC, APRA, or another Commonwealth body prescribed by regulation; or
- a journalist or member of parliament, if the disclosure meets the threshold of being a 'public interest disclosure' or an 'emergency disclosure'. Before making a disclosure to either person, the discloser should ensure they understand the criteria for making one of these disclosures (including that the disclosure must previously have been made to ASIC, APRA or a prescribed Commonwealth authority, and that at least 90 days has passed).



6. Investigation of Reportable Conduct

HIAPL will investigate all matters reported under this policy as soon as possible after the matter has been reported. A Protected Disclosure Officer may, where appropriate, appoint a person to assist in the investigation of a matter raised in a report.

Where appropriate, HIAPL will provide feedback to you regarding the investigation's progress and/or outcome (subject to considerations of the privacy of those against whom allegations are made).

The investigation will be conducted in an objective and fair manner, independently of any person or persons who are the subject of the Reportable Conduct and otherwise as is reasonable and appropriate having regard to the nature of the Reportable Conduct and the circumstances. It should be noted that the investigation process may vary depending on the nature of the Reportable Conduct and the amount of the information provided.

You should note that HIAPL's investigative processes may be limited if you are unable to provide key information to HIAPL, or if HIAPL is unable to contact you, or if you do not consent to a limited amount of information being disclosed by HIAPL in order to progress the investigation.

HIAPL will endeavour to update you concerning and during the key stages in the investigation as appropriate. HIAPL will also confirm the relevant outcomes after the investigation has been completed.

7. Protection of Whistleblowers

HIAPL is committed to ensuring confidentiality in respect of all matters raised under this policy, and that those who make a report are appropriately supported, treated fairly and do not suffer any detriment or disadvantage.

7.1 Protection of your identity and confidentiality

HIAPL will not, nor will any supervisor, manager or Protected Disclosure Officer, disclose any particulars that would suggest or reveal your identity as a whistleblower without first obtaining your consent.

Any disclosure that you consent to will be made on a strictly confidential basis. However, you should note that HIAPL may:

- (a) be required at law to disclose your identity to ASIC, APRA or the Australian Federal Police in order to comply with legislative requirements;
- (b) disclose your identity to a legal practitioner for the purposes of obtaining legal advice; or



- (c) to a person or body prescribed by regulations.

In practice, HIAPL will seek to ensure:

- (i) that your identity is kept confidential by seeking to redact key information that may disclose your identity. Where possible, HIAPL will contact you to seek your assistance in identifying those aspects of your disclosure that could lead to you being inadvertently identified; and
- (ii) that materials relating to your disclosure will be retained securely, and access to those materials will be restricted to those who will manage HIAPL's investigation into the disclosure.

You can choose to remain anonymous:

- (A) while making a disclosure or report under this policy;
- (B) during the course of any investigation; and
- (C) after any investigation has concluded.

You may refuse to answer questions if you are concerned that the answer could reveal your identity at any time, including during follow-up conversations. If you elect to remain anonymous, HIAPL respectfully requests that you maintain ongoing two-way communication with HIAPL through use of a communication method that doesn't make your identity obvious, or using a proxy or independent third party in order that HIAPL can ask further follow-up questions as part of its investigation.

7.2 Protection of files and records

All files and records created from an investigation will be retained under strict security and will not be disclosed to anyone not involved in the investigation (other than senior managers or directors who need to know to take appropriate action, or for corporate governance purposes) without your consent.

A release of information in breach of this policy will be regarded as a serious matter and will be dealt with under HIAPL's disciplinary procedures.

7.3 Protection from detrimental treatment

HIAPL does not tolerate retaliation or adverse action related to a whistleblowing disclosure.

A HIAPL employee or contractor within a HIAPL team who is subjected to detrimental treatment (such as dismissal, demotion, harassment, discrimination, disciplinary action, bias, threats or other unfavourable treatment connected with making a report) as a



result of making a report under this policy should inform any person nominated as an eligible recipient under this policy immediately.

HIAPL will endeavour to provide appropriate support services to you throughout any period relevant to your disclosure. These include provision of our free and confidential assistance program through Newport & Wildman, available as follows:

Phone: 1800 650 204

Email: admin@newportwildman.com

Web: newportwildman.com

If you are a HIAPL employee, HIAPL may consider making changes to your work duties in order to reduce the risk of detrimental treatment. These may include permitting you to perform your duties from another location, reassigning you to another equivalent role or making other adjustments to protect you as appropriate.

If the matter is not remedied, you should make a separate report concerning the detrimental treatment in accordance with section 5 of this policy, and HIAPL will seek to ensure that the matter is investigated separately.

7.4 Compensation and other remedies

You may seek compensation or other remedies at law if:

- (a) you suffer loss, damage or injury due to any report or disclosure you make under this policy; and
- (b) HIAPL fails to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

7.5 Liability protections

By law, you are protected from any of the following in relation to a report or a disclosure that you make:

- (a) civil liability in that HIAPL will not take legal action against you for breach of your employment contract, a duty of confidentiality or similar contractual obligation if such things are solely due to your disclosure;
- (b) criminal liability in that HIAPL will not press charges or seek your prosecution for unlawfully releasing information or other criminal activity (other than for making a false disclosure); and
- (c) administrative liability in that HIAPL will not take disciplinary action against you for making the disclosure.



You should note that these protections do not grant immunity for your own misconduct if you have chosen to reveal information about that misconduct in your disclosure.

7.6 Corporations Act protections

In addition to the protections under this policy, the Corporations Act 2001 (Cth) offers statutory protection of whistleblowers in certain circumstances. These include protections for those who make public interest or emergency disclosures to journalists or parliamentarians, which qualify for special protection under that legislation. HIAPL will comply with all applicable legislative requirements.

8. How this policy is to be made available to officers and employees

HIAPL will ensure that this policy is made available to officers and employees by:

- holding briefing sessions and meetings for staff to address the policy on an ongoing basis;
- post the policy on its document management system, ensuring that all staff and officers have access;
- email the policy to employees and officers, setting out the policy's key features;
- incorporate the policy in inductions for new staff;
- make the policy available on HIAPL's external-facing website for potential disclosers outside the entity (redacting such information that is not appropriate for external publication); and
- ensure that staff and officers who have duties and responsibilities under this policy receive appropriate training.