

CODE OF CONDUCT

1. Purpose

The Cornetts’ Whistleblower policy provides for processes and protections regarding the disclosure of behaviours which are reportable.

Cornetts is committed to supporting a culture where team members feel comfortable to speak up where they suspect or have concerns that activities are being undertaken which contravene the Cornetts’ Code of Conduct, place others at risk, or could be considered illegal action.

2. Scope

This Whistleblower Policy applies to all Cornetts Supermarkets team members, hosted employees, contractors, suppliers and visitors who are all expected to behave appropriately and practice high standards of professionalism in their personal conduct. The code is supplemented by the Cornetts Code of Conduct and the Cornetts Supermarkets quality and safety management systems.

This Policy details the framework for receiving, investigating and addressing allegations of Reportable Conduct.

3. Definitions

Term	Definition
Allegation	Allegations of Reportable Conduct raised in a disclosure by a Whistleblower made under this policy
Cornetts Supermarkets	Includes all sites operated by Cornetts, including stores, support office, retail outlets branded other than Cornetts and/or IGA, including Everfresh, and businesses where Cornetts acts as administrator.
Conflict of Interest	A situation in which a person can derive personal benefit from actions or decisions made in their official work capacity.
CEO	Chief Executive Officer
Ethical	Moral, upright, honest, virtuous, honourable
Fraud	Deceit, trickery, sharp practice, or breach of confidence, perpetrated for profit or to gain some unfair or dishonest advantage.
Professional Behaviour	The accepted way a team member in the retail industry should act.
Reportable Conduct	Conduct which breaches policy, is illegal, fraudulent, corrupt, dishonest or places the business or team members at risk.
Theft	Theft is taking something from another person or an organisation without consent or purchase. It is a crime against property, like money and other valuable things.
Unethical	Immoral, lacking principles and unwilling to adhere to proper rules of conduct
Victimisation	Any actual or threatened conduct that could cause a detriment to the Whistleblower or a team member assisting with the investigation of a Whistleblower report, as a result of making the disclosure.
Whistleblower	A person who makes a report of Reportable Conduct
Whistleblower Protection Officer (WPO)	GM, HR & Safety Executive Operations Manager

4. Behaviour or activities which are reportable

The Whistleblower policy may be used to report Reportable Conduct, which is, but may not be limited to:

- A breach of internal policy (including the Code of Conduct);
- Team member dishonesty;
- Fraudulent activity;
- Corruption;
- Illegal activity;
- Unethical behaviour;
- Conflicts of interest;
- Misconduct;
- Practices which place team members and/or customers at risk;
- Behaviour which brings dispute to the business; and
- Actions which result in financial loss for the business.

The Whistleblower policy and process should be used in conjunction with the Grievance Procedure. Where a team member has a grievance, this should be reported using the Grievance Procedure. The Whistleblower policy should be used only when a team member wishes to report behaviours or activities which have an impact on the overall business, and where the team member wishes to remain anonymous in their reporting.

5. Report a breach of policy

Cornetts supports a culture where team members can report Reportable Conduct. When a valid disclosure is made the team member making the disclosure is protected from disciplinary action, victimisation, retaliation and adverse action.

Team members can report Reportable Conduct, while being protected by this policy, by the following means:

1. Whistleblower Hotline – Phone (07) 3062 2327
 - The Whistleblower hotline will divert to a recorded message, allowing the caller to make an anonymous report. The message will be sent electronically to the Cornetts Whistleblower Protection Officer (WPO).
2. Whistleblower email – Found on the Cornetts Website (<https://cornetts.com.au/>)
 - This reporting mechanism will generate a form, which a team member can complete online. The form will then be emailed to the Whistleblower Protection Officer WPO. The form allows the team member to opt out of providing personal details, to ensure anonymity.

If a team member makes a report to a line manager or supervisor of Reportable Conduct, it is that manager's/supervisor's responsibility to immediately report the matter to the WPO. Failure to pass reports of Reportable Conduct will result in an investigation into that failure, which could lead to formal performance management up to and including termination.

6. Confidentiality, Privacy and Victimisation

Team members using the Whistleblower reporting process are encouraged to share their identity when making a disclosure, as this will make investigating the report easier. However, where a team member does not wish to disclose their identity, they can remain anonymous.

Cornetts will make all reasonable efforts to ensure that the identity of a Whistleblower remains anonymous. Any report made using the Whistleblower reporting process will be treated as confidential.

A team member's identity will only be disclosed where:

- Consent is given;
- There is a requirement by law;
- Where discloser is required to prevent serious threat to a person's health and safety.

Cornetts is committed to ensuring that any person who reports Reportable Conduct, acts as a witness or participates in investigations, or involved in any way with respect to a report of Reportable Conduct is not victimised. Where a claim of victimisation is made, Cornetts will investigate the matter and where it is proven, those who have victimised a team member may be subject to performance management, up to and including termination of employment

7. Investigation of a Whistleblower Report

A Whistleblower's report may only be investigated and acted upon following referral to a WPO. Any other person, such as a line manager or supervisor, who receives a report of Reportable Conduct must immediately refer it to a WPO, take no further action and keep the report confidential.

The Whistleblower report needs to include:

- The date and a detailed description of the Reportable Conduct;
- The identity of the alleged wrongdoer;
- The site location where the Reportable Conduct occurred;
- Other witnesses to the Reportable Conduct.

All Protected Disclosures will ultimately be reported to the CEO, either as part of the Whistleblower Register, or as standalone agenda items in circumstances where the WPO determines this is warranted or necessary. The WPOs or CEO will determine whether sufficient information exists to allow the report to be investigated, whether an investigation is required, and, if so, determine the appropriate investigation process.

Where an investigation is required the WPO and/or CEO will determine:

- The nature and scope of the investigation;
- Who will conduct the investigation;
- The nature of any technical, financial or legal advice that may be required; and
- A timeframe for the investigation

Where the Whistleblower has provided details of their identity, and where Cornetts deems it appropriate and permissible to do so, the Whistleblower will be informed on a continuing basis as to the nature and progress of the investigation.

Cornetts may be required to refer an allegation of Reportable Conduct to the Police or other agency (e.g. Work Safe Queensland).

Cornetts will apply principles of procedural fairness and natural justice to the conduct of any investigation and resultant findings arising from the report of Reportable Conduct.

The person leading any investigation will report their findings to the WPO, where the WPO has not personally conducted the investigation. A report will be submitted to the WPO and/or CEO to determine the course of action. Action may include performance management up to and including termination, depending of the outcome of the investigation.

The Whistleblower will be informed of the conclusion of the investigation but may not be informed of the outcome in order to maintain confidentiality between the business and the team member against whom the report was made.

8. False of Misleading Reports

If it is found that a team member knowingly makes a false, vexatious or misleading report of Reportable Conduct, or who otherwise fails to act honestly with reasonable belief in respect of the report, may be subject to disciplinary action, up to and including dismissal.

9. Support for Whistleblower and Investigation Participants

The WPO can initiate or coordinate support for employees who have, or are in the process of making a report, including access to the Cornetts Employee Assistance Program.

10. Policy Review

This policy will be review on an annual basis and at any time where relevant laws and legislation are changed.

11. Relevant Legislation

<i>Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 (Cth)</i>	<i>Corporations Act 2001 (Cth)</i>
<i>Whistleblowers Protection Act 1994 (Qld)</i>	<i>Fair Work Act 2009 (Cth)</i>
<i>Australian Human Rights Commission Act, 1986</i>	<i>Work Health and Safety Act 2011 (Qld)</i>
<i>Australian Human Rights Commission Regulation 1989 (Cth)</i>	<i>Work Health and Safety Regulation 2011 (Qld)</i>

12. Associated documents

Policy	Cornetts Code of Conduct, Social Media Policy; A Drug and Alcohol-Free Workplace; Workplace Bullying, Harassment and Sexual Harassment; Equal Employment Opportunity
Procedures	Grievance Management Procedure, Dress and Appearance Procedure, Induction Procedure
Forms	Whistleblower email found on the Cornetts internet site at https://cornetts.com.au/