



Excellence in Pre-Fabricated Solutions  
for Mission Critical Facilities.

Several white, hand-drawn style squares of various sizes and orientations are scattered across the page, some overlapping the main text and others floating in the background.

# Whistleblower Policy.

# Whistleblower Policy.

## 1. Who This Policy Applies To

---

- (a) This policy is adopted by and applies to Parratech Group Pty Ltd ACN 634 192 920 (Company).
- (b) It also applies to any of the Company's:
  - (i) Australian related bodies corporate; and
  - (ii) non-Australian related bodies corporate, to the extent permitted by applicable local laws, and only in relation to conduct connected with the operations of the Group,and is intended to operate as a single, consistent whistleblower framework across the Group.
- (c) Group means the Company and each related body corporate (as defined in the Corporations Act 2001 (Cth)).
- (d) This policy applies to all current and former:
  - (i) employees, workers, and labour-hire personnel at our manufacturing sites, and construction-related operations;
  - (ii) subcontractors, installation crews, suppliers, transport partners, and consultants;
  - (iii) officers, directors, and managers;
  - (iv) apprentices, trainees, interns, and work experience participants;
  - (v) relatives or dependants of any of the above.

## 2. Purpose

---

- (a) The Company is committed to maintaining the highest standards of integrity, safety, compliance, and ethical conduct across our manufacturing sites, construction-related operations, workshops, design functions, procurement streams, and supply chain.
- (b) This policy has been prepared in accordance with the Corporations Act 2001 (Cth) section 1317A1 and ASIC Regulatory Guide 270.
- (c) The purpose of this policy is to:
  - (i) encourage reporting of wrongdoing in a safe, confidential, and protected way;
  - (ii) ensure whistleblowers are aware of the protections provided by law;
  - (iii) outline how disclosures can be made and how they will be handled; and
  - (iv) support our safety-critical and high-risk operating environment by identifying problems early.

### 3. Eligible Whistleblower

---

An eligible whistleblower is:

- (a) a current or former:
  - (i) officer or employee of the Company;
  - (ii) individual who supplies goods or services to the Company;
  - (iii) employee of an entity who supplies goods or services to the Company; or
  - (iv) individual who is an associate of the Company;
- (b) a spouse or child of any of the above individuals; or
- (c) a dependent of any of the above individuals or of such an individual's spouse.

### 4. What Can Be Reported (Disclosable Matters)

---

- (a) A disclosure qualifies for protection under the Corporations Act if it relates to misconduct or an improper state of affairs or circumstances in relation to the Company, including:
  - (i) fraud, theft, false invoicing, or financial irregularities;
  - (ii) unsafe practices that risk serious injury at manufacturing or construction sites;
  - (iii) deliberate breaches of WHS laws or failure to follow mandatory safety procedures (e.g. LOTO, plant isolation, mobile-plant controls);
  - (iv) unlawful or unethical procurement practices (e.g. conflicts, kickbacks, improper supplier selection);
  - (v) breaches of environmental regulations, including improper waste disposal or emissions breaches;
  - (vi) bribery or corruption involving government or private contractors;
  - (vii) systemic underpayment or breaches of Awards, or labour laws;
  - (viii) behaviour that represents a danger to the public.
- (b) A whistleblower does not need to prove wrongdoing – only have reasonable grounds to suspect it.

### 5. What is not normally covered

---

- (a) Purely personal employment grievances generally do not qualify for protection under the Corporations Act (but may nevertheless be made, as applicable, to an HR representative or direct manager), unless they involve:
  - (i) victimisation due to whistleblowing;
  - (ii) systemic WHS issues;
  - (iii) conflicts of interest; or

- (iv) unlawful or dangerous conduct.
- (b) Examples of personal work related grievances include:
  - (i) an interpersonal conflict between the whistleblower and another employee;
  - (ii) a decision that does not involve a breach of work place laws;
  - (iii) a decision about the engagement, transfer, or promotion of the whistleblower;
  - (iv) a decision about the terms and conditions of engagement of the whistleblower;
  - (v) a decision to suspend or terminate the employment of the whistleblower or to otherwise discipline the whistleblower.

## **6. Who Can Receive a Protected Disclosure**

---

- (a) For a disclosure to be protected, it must be made to an eligible recipient, including:
  - (i) internal eligible recipients:
    - (A) Company director;
    - (B) any member of the Executive Leadership Team;
    - (C) Head of HR;
    - (D) the Company's internal auditor (or, as applicable, external auditor); or
    - (E) General Counsel;
  - (ii) external eligible recipients:
    - (A) ASIC, APRA, or another Commonwealth body prescribed by regulation; or
    - (B) a legal practitioner (for the purpose of seeking advice about whistleblower protections).
- (b) Disclosures may be made anonymously, and anonymity must be protected.

## **7. Public Interest or Emergency Disclosures**

---

### **7.1 Disclosure to a Journalist or Member of Parliament**

- (a) In limited circumstances, a whistleblower may make a disclosure of information to a journalist or a Member of Parliament (Public Disclosure or Emergency Disclosure) and still qualify for protection under the Corporations Act.
- (b) Such disclosures are subject to strict requirements and protections are only available if those requirements are met.

## 7.2 Public Interest Disclosure

A whistleblower may make a disclosure to a journalist or a Member of Parliament where all of the following have been satisfied:

- (a) the whistleblower has previously made a disclosure of disclosable matter to ASIC, APRA or another prescribed regulator;
- (b) at least 90 days have passed since the disclosure was made to the regulator;
- (c) the whistleblower has reasonable grounds to believe that no action has been taken, or that action taken has been inadequate;
- (d) prior to making the disclosure to the journalist or Member of Parliament, the whistleblower has given written notice to the regulator that identifies the previous disclosure and states that the whistleblower intends to make a public interest disclosure; and
- (e) the disclosure to the journalist or Member of Parliament includes only information that is reasonably necessary to inform them of the disclosable matter.

## 7.3 Emergency Disclosure

A whistleblower may make a disclosure to a journalist or a Member of Parliament where all of the following have been satisfied:

- (a) the whistleblower has previously made a disclosure of disclosable matter to ASIC, APRA or another prescribed regulator;
- (b) the whistleblower has 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;
- (c) prior to making the disclosure, the whistleblower has given written notice to the regulator that identifies the previous disclosure and states that the whistleblower intends to make an emergency disclosure; and
- (d) the disclosure to the journalist or Member of Parliament includes only information that is reasonably necessary to inform them of the substantial and imminent danger.

## 7.4 Limitations

Protections for Public Interest or Emergency Disclosures will not apply where the disclosure:

- (a) includes information that is not reasonably necessary to disclose the relevant matter or danger;
- (b) is made without first meeting the conditions set out above; or
- (c) involves the disclosure of information protected by legal professional privilege, unless an exception applies under law.

## 7.5 Independent Advice

The Company encourages any individual considering making a disclosure to a journalist or a Member of Parliament to seek independent legal advice before doing so, to ensure the disclosure is made in a way that attracts legal protections.

## 8. How to Make a Disclosure

---

While protected disclosures can be made to any eligible recipient, the Company encourages any person seeking to make a disclosure to contact an internal eligible recipient as the primary option via:

- (a) the Company's dedicated whistleblower email: [whistleblower@parratech.com.au](mailto:whistleblower@parratech.com.au);  
or
- (b) direct approach to any eligible recipient.

## 9. Protections for Whistleblowers

---

### 9.1 Identity protection (confidentiality)

- (a) Where the Company receives a disclosure that qualifies for protection under the Corporations Act, the Company and its officers must not disclose a whistleblower's identity or information likely to lead to identification unless: the whistleblower consents; disclosure is to ASIC, APRA, or a member of the Australian Federal Police; or disclosure is to a legal practitioner for the purpose of obtaining legal advice or representation about the whistleblower provisions in the Corporations Act.
- (b) The information contained in a protected disclosure can only be disclosed by the Company if:
  - (i) the information does not include the whistleblower's identity (unless permitted as set out above);
  - (ii) the Company has taken all reasonable steps to reduce the risk that the whistleblower will be identified from the information; and
  - (iii) it is reasonably necessary for investigating the issues raised in the disclosure.

### 9.2 Protection from detriment

- (a) The Company must protect whistleblowers from being:
  - (i) dismissed, demoted or suspended;
  - (ii) threatened, bullied, intimidated or victimised;
  - (iii) injured or harmed;
  - (iv) disadvantaged in procurement or contracting decisions;
  - (v) subject to negative performance treatment due to their disclosure.
- (b) However, examples of actions that are not detrimental conduct include:
  - (i) administrative action that is reasonable for the purpose of protecting a whistleblower from detriment (e.g. moving a whistleblower who has made a disclosure about their immediate work area to another office to prevent them from detriment); and
  - (ii) managing a whistleblower's unsatisfactory work performance, or other work related conduct which is not connected to the disclosure

- (c) Support and practical protection of disclosers include that the Company will:
  - (i) conduct a detriment risk assessment promptly following receipt of the disclosure;
  - (ii) monitor ongoing work conditions;
  - (iii) take disciplinary action against anyone engaging in victimisation;
  - (iv) escalate issues to the Managing Director, Head of Safety, or General Counsel if safety risks arise;
  - (v) ensure subcontractors and labour-hire partners understand their obligations.
- (d) What is necessary and appropriate will depend on the circumstances of the case (including whether the identity of the discloser is known) but may include:
  - (i) allowing the discloser to perform their duties from another location, reassigning the discloser to another role or modifying their duties or reassigning or relocating other staff involved in the disclosure;
  - (ii) actions to ensure that management are aware of their responsibilities to maintain the confidentiality of a disclosure, address the risks of isolation or harassment, manage conflicts, and ensure fairness when taking management action in respect of a discloser;
  - (iii) intervening where detriment has already occurred or appears imminent to ensure that it does not continue and that any necessary remedial measures are put in place; and
  - (iv) providing EAP or wellbeing support.

### 9.3 Compensation and remedies

- (a) A whistleblower (or any other employee or person) can seek compensation and other remedies through the courts if they suffer detriment because they make, propose to make (or are suspected of making or proposing to make) a protected disclosure.
- (b) Whistleblowers who are concerned about these matters are encouraged to seek independent legal advice.

### 9.4 Immunity from certain liability

A whistleblower cannot be pursued civilly, criminally (other than for knowingly providing false information), or administratively for making a protected disclosure.

## 10. Investigation Process

---

### 10.1 Initial triage

The eligible recipient, another authorised recipient, or management panel (Disclosure Manager) will:

- (a) confirm whether the disclosure qualifies for protection;
- (b) conduct a preliminary risk assessment;
- (c) determine whether investigation is required.

## 10.2 Investigation

The investigation process followed will depend on the nature and circumstances of the disclosure. Nonetheless, all investigations will follow a process similar to the one described below:

- (a) if the Disclosure Manager determines that an investigation is warranted, the Disclosure Manager will ensure that investigation is carried out by internal or external personnel who have the necessary skills, knowledge and independence;
- (b) any employee of the Company who is the subject matter of a disclosure will be informed of the subject matter of the investigation and afforded procedural fairness at such time as the Disclosure Manager determines is appropriate to do so but prior to the conclusion of the investigation;
- (c) the investigator will keep records of all the interviews conducted and all records received which affect the outcome of the investigation;
- (d) once the investigation is complete, the Disclosure Manager will submit a report to a Director of the Company who will determine what, if any, further action is to be taken; and
- (e) where the identity of the whistleblower is known (or is unknown but a channel of communication is available) the Disclosure Manager will:
  - (i) acknowledge receipt of the disclosure to the whistleblower as soon as practicable following receipt of the disclosure;
  - (ii) further communicate with the whistleblower throughout the investigation process at such times as it is appropriate to do so (this may include specific questions or requests for information to assist the investigation or may be a general update on the progress of the investigation if the investigation period is extended);
  - (iii) ensure the whistleblower is kept informed of the outcomes of the investigation in a timely manner subject to the considerations of privacy of those against whom the disclosure is made.

## 11. Fair Treatment of Employees Mentioned in Disclosures

---

The Company will:

- (a) treat all persons fairly and with procedural fairness;
- (b) protect confidentiality throughout investigations;
- (c) give individuals an opportunity to respond where appropriate;
- (d) ensure investigations are objective and evidence-based.

## 12. No Repercussions for Genuine Reports

---

The Company will not tolerate any action taken against a whistleblower who reports a concern honestly and on reasonable grounds, even if the allegation is not substantiated.

### 13. False or Malicious Reports

---

Deliberate false reporting may constitute misconduct and result in disciplinary or other appropriate action being taken against the whistleblower. However, a report is not false merely because it cannot be substantiated or is incorrect.

### 14. Accessibility of the Policy

---

This policy will be:

- (a) published on the Company's website;
- (b) included in induction for employees, subcontractors, and labour-hire personnel;
- (c) provided to supplier and construction partners;
- (d) supported with annual training.

### 15. Review of Policy

---

This policy will be reviewed every two years, or earlier if required by changes to the Corporations Act, ASIC guidance, or the operating environment of manufacturing and construction.

Approved by



**Jason Fooks**  
Managing Director

| REVISION | Date        | Last reviewed |
|----------|-------------|---------------|
| A        | 22 May 2026 | 22 May 2026   |