

WHISTLEBLOWER POLICY

OVERVIEW

The Whistleblower Protection Policy (Policy) sets out how SCHÜTZ Australia Pty Ltd deals with Whistleblower disclosures under the Corporations Act.

SCHÜTZ Australia's Whistleblower Policy directly supports our Code of Conduct. This Policy is available to all officers, employees, labour hire workers and suppliers of SCHÜTZ Australia Pty Ltd.

SCHÜTZ Australia Pty Ltd encourages reporting of improper conduct or wrongdoing. This can be done confidentially or anonymously. SCHÜTZ Australia Pty Ltd provides protection to those making such reports.

THE COMPANY VALUES

This policy is underpinned by the SCHÜTZ Australia Code of Conduct, which provides framework of principles for SCHÜTZ employees and associates.

WHAT IS A WHISTLEBLOWER DISCLOSURE?

A "Whistleblower Disclosure" is a report of misconduct, wrongdoing or improper state of affairs or circumstances made by an eligible whistleblower to an eligible recipient, or otherwise in accordance with the Corporations Act.

RESPONSIBILITIES OF:

Employees, officers, labour hire workers and suppliers of SCHÜTZ Australia

If something does not seem right, does not reflect the Code of Conduct, or contradicts our policies or law, we all have the right and responsibility to speak up. Whether we are directly impacted or not, we should raise this as a concern.

Whistleblowers

Protection will generally be available to whistleblowers who disclose misconduct or wrongdoing in circumstances where the Whistleblower has reasonable grounds to suspect that misconduct, wrongdoing or improper conduct has occurred. If the whistleblower is apprehensive, they can make a report anonymously.

COMMITMENT TO PROTECTING WHISTLEBLOWERS

An eligible whistleblower who makes a whistleblower disclosure will not be subject to any civil, criminal or administrative liability (including disciplinary action) for making the whistleblower disclosure. An eligible whistleblower has the meaning given to the term in the Corporations Act 2001 (Cth).

Where a whistleblower requests anonymity, SCHÜTZ will not disclose their identity, or information likely to lead to the identification of the whistleblower, unless it is in the course of disclosing information to a prescribed government regulator, police or a legal practitioner, or where the whistleblower has provided their consent, or where SCHÜTZ is required to do so by law.

SCHÜTZ and its employees, officers and directors must not victimise an eligible whistleblower as a consequence of a whistleblower disclosure. SCHÜTZ Australia will afford fair treatment to whistleblowers and persons to whom whistleblowers disclosures relate to. SCHÜTZ will promptly investigate allegations of victimisation.

DISCLOSURES NOT PROTECTED

A person who purports to make a Whistleblower Disclosure but does not have reasonable ground to suspect the information or a person who makes trivial or vexatious or malicious allegations in nature with no reasonable basis will not be protected under the Whistleblower Policy.

Personal "work-related grievances" are not protected disclosures. If a whistleblower is implicated in a disclosure they have made, the act of disclosure will not shield them from the reasonable consequences flowing from their involvement in the misconduct or wrong-doing.

Persons who make disclosures without reasonable grounds (for example, made intentionally falsely or for improper or ulterior reasons) may be subject to disciplinary action and other appropriate consequences.

REPORTING OF MISCONDUCT OR WRONGDOING

Whistleblowers may report:

- by contacting the Managing Director or the Head of Group HR/Compliance
- through the confidential email: hmelbourne@schuetz.net
- where local law allows, to a designated government regulator who is responsible for the regulation of corporations, or
- an auditor, or a member of the audit team conducting an audit of any entity in the SCHÜTZ Group.

INVESTIGATIONS

Where an investigation is necessary, it will be undertaken by the Whistleblower Investigation Officer. SCHÜTZ Australia has designated the Head of Group HR/Compliance as the Whistleblower Contact Officer (and eligible recipient) for the purposes of Whistleblower Disclosures.

SCHÜTZ Australia reserves the right to refer cases to an external investigator if deemed necessary.

The Whistleblower Investigation Officer will:

- (a) consider whether the conduct raised constitutes a whistleblower disclosure and where it does, notify the discloser of any other processes outside of the whistleblower process that can be taken to address the allegations.
- (b) enable an investigation where necessary into the misconduct or improper state of affairs or circumstances.

RESPONDING TO MISCONDUCT DISCLOSURES

SCHÜTZ takes every report very seriously. All disclosures of misconduct or wrongdoing will be assessed diligently upon receipt.

Generally:

- A staff member about whom a report has been made will be informed as soon as appropriate and given the opportunity to respond to the allegation(s).
- Natural justice will be observed so that the investigation is conducted with procedural fairness.
- SCHÜTZ will consider what action, including appropriate sanctions, should be taken against any person involved in misconduct or wrong-doing.
- Where claims cannot be substantiated, and the Whistleblowers identity is known, the company will deem a disclosure closed and notify the Whistleblower.

GOVERNANCE AND POLICY REVIEW

This policy must be read in conjunction with SCHÜTZ Australia's Company Code of Conduct except that, to the extent of any inconsistency, this Policy will apply.

In addition to the related code of conduct, the Policy will be interpreted with regard to the approach specified in each of the following as amended from time to time:

- (a) The Association Materials Management, Purchasing and Logistics (AMMPL) Code of Conduct
- (b) Schütz GmbH & Co KGaA IT Infrastructure Security Policy
- (c) Schütz GmbH & Co KGaA How to Handle Information Policy and
- (d) The SCHÜTZ Group Competition Law Compliance Manual Australia Addendum

This policy is not intended to go beyond the protections provided in the Corporations Act and does not impose any contractual duties, implied or otherwise.