

PanAust Whistleblower Service



PanAust is committed to fostering an open and transparent environment in which employees and stakeholders are encouraged to report conduct contrary to The PanAust Way.

If you think a decision or action is inconsistent with The PanAust Way, any company policy, standard or procedure, or any law of the country in which PanAust operates, then you have a right and a responsibility to raise that concern. The PanAust Whistleblower Standard and associated Whistleblower services, provide an avenue to make an anonymous and confidential report.

Be assured your confidentiality will be respected.

What is the PanAust Whistleblower Service?

The **PanAust Whistleblower Service** is a confidential and anonymous way for PanAust employees (including employees of PanAust subsidiaries) and external stakeholders, to report or raise concerns about misconduct in the workplace or with PanAust activities.

What is Misconduct?

Misconduct is any behaviour, or potential behaviour, which goes against the key principles that underlie our every action at PanAust, as defined in The PanAust Way. Breaches of specific PanAust policies can also constitute misconduct. This includes:

- Illegal actions;
- Theft or Fraud;
- Dishonesty;
- Corrupt practices, soliciting of bribes or misappropriation;
- Malicious or inappropriate behaviour;
- Undisclosed conflicts of interest;
- Harassment, victimisation or any other conduct that may breach PanAust workplace behaviour.

**** Note:** *Issues or grievances relating to terms or conditions of employment should be first raised with your supervisor or manager. If the matter(s) is not resolved, these should be raised with your local workplace representative committee (if appropriate).*



How does the PanAust Whistleblower Service work?

All matters reported to the PanAust Whistleblower Service will be raised with the PanAust Whistleblower Officer, for prompt investigation, while maintaining the confidentiality and/or anonymity of the person raising the concern. PanAust will provide feedback to the person raising the concern via the Whistleblower Service (where appropriate) about action(s) taken in respect of a report.

Who is the Whistleblower Officer?

PanAust's General Counsel is the Whistleblower Officer, who will ensure protection of any person who, acting in good faith, makes a report via the PanAust Whistleblower Service.

How am I protected?

PanAust is committed to protecting and respecting the rights of a person who makes a report in good faith under the PanAust Whistleblower Standard. The name of any person making a report will only be passed on to PanAust with the permission of the person making the report. PanAust will ensure that any person who makes a report of unacceptable conduct will not be penalised in any way for making that report.

How can I make a report?

The PanAust Whistleblower Service can be contacted by telephone, web form, email or mail:

Telephone - (Whistleblower Line)	Australia (English and all languages translated) Laos (Lao and English languages) Tok Pisin (English and Tok Pisin translation available)	1800 910 937 021-241-991 (+856 21 241 991) +61 (0) 7 3117 2002
Web Form -	http://www.panaust.com.au/whistleblower-service-form	
Email -	panaustethics@panaust.com.au	
Mail -	PanAust Whistleblower Officer PO Box 2297 Fortitude Valley Business Centre QLD 4006 Australia	

What information do I need to provide when I make a report?

The type of information you need to provide when reporting a suspected incident of misconduct should include:

- Names of employees/people involved in the incident;
- Names of involved site, department, section;
- Date, time and location of incident(s);
- Details of any proof;
- Any other information which may be useful for an investigation into the incident.

Links to relevant documents

The PanAust Whistleblower Standard can be found within the Legal/Governance section of the company's intranet (PanNet) and the PanAust website.

Frequently Asked Questions

Q **What type of misconduct can I report through the Whistleblower Service?**

A Examples of misconduct are described on page 1 of this document and include theft, fraud, dishonesty or unethical behaviour within PanAust.

The service is not intended for situations where you have a complaint or grievance in relation to the terms and conditions of your employment, the outcome of a performance review, an application for promotion, or salary determination. PanAust has a Fair Treatment System in place to address these situations if necessary. However, if you are subjected to, or are concerned about intimidation, harassment or reprisal, as a result of using the Fair Treatment System, you can consider making a report using the Whistleblower Service.

Q **Can I call after hours?**

A In Australia, and In Laos, callers may leave a message out of normal business hours (only if they wish to leave their name). An operator will call back the next business day in response to an out-of-hours message if contact details are provided. Other reporting methods available in addition to the telephone include email or web form. The email address is: panaustethics@panaust.com.au or the webmail form can be accessed via the link <http://www.panaust.com.au/whistleblower-service-form>

Q **How can I remain anonymous?**

A At no stage is any caller obliged to provide their name. Telephone calls to the Whistleblower Line are not recorded, nor is there a caller ID to identify the call. Your report will be allocated a reference number, which is how you can liaise on your report or be provided updates anonymously. If you decide to remain anonymous, no one will know who you are. If you wish your name to be kept confidential but do not require anonymity, your name will only be disclosed to those who have a need to know it for the purposes of investigating and responding to your complaint.

If you decide to remain anonymous, you should be aware that this may make it more difficult to investigate your concerns and determine if they are well founded. Because we will not know who you are, we cannot contact you to ask for sources of information or additional facts.

To more completely protect your confidentiality or anonymity, you may want to use a computer at home, the library or other location that is not part of PanAust's computer network when making a report.

Q **How does reporting online work?**

A This web site is secure, to ensure that your communication with PanAust Whistleblower Service remains between you and PanAust Whistleblower Service.

- Submit a report by clicking on "PanAust Whistleblower Service" and typing your submission in the box provided. Use the "Tips" to get you started.
- Add file attachments by clicking on "I want to attach one or more files." All files will be converted to PDF format before being submitted with your report.
- Once you submit your case report, you will be assigned a unique case number. Please retain this case number in a safe place. You will use it to learn what action is being taken as a result of your submission, or to add information to your submission.
- PanAust Whistleblower Service will process your communication into a confidential case report and quickly refer it to the specified personnel in PanAust.
- You may review the response to your submission or provide more information to your submission by using the toll-free phone number for PanAust Whistleblower Service, or by emailing panaustethics@panaust.com.au
- If you forget your case number but have more information to provide, please submit a new case report.
- The PanAust Whistleblower Service never reveals any case number.
- To more completely protect your online anonymity, you may want to use a computer at home, the library or other location that is not part of your organisation's computer network when making a submission.

Q **Who does the PanAust Whistleblower Service disclose information to?**

A Any information reported via the PanAust Whistleblower Service is immediately forwarded to the PanAust Whistleblower Officer.

Q **Are the police involved if I make a report?**

A If the Whistleblower Officer decides the matter involves unlawful conduct, then they may notify the appropriate law enforcement agency, if such action is warranted.

Q **What if I only suspect something is wrong, but am not 100% sure?**

A Most cases of misconduct are uncovered through tips from honest people who are not sure of their facts. That is perfectly alright. The telephone operator who takes the call does not expect you to know every detail. Whether reporting via the telephone or other methods you will be prompted for information. Reporting the information you do know, is enough.