



# WHISTLEBLOWER POLICY

Document No: 05294

Revision: 1

Issue Date: 14 May 2019

Owner: Director, Legal, Risk and Governance

Page: 1 of 4

## 1. Purpose

The purpose of this Policy is to ensure everyone at Synlait feels confident and supported to raise concerns about actual, suspected or anticipated wrongdoings within Synlait without fear of retaliation.

The Policy sets out what a wrongdoing is, who those wrongdoings can be reported to, and how Synlait will deal with wrongdoings reported.

Anyone who encounters wrongdoing is encouraged to report it using the procedures set out in this Policy. This reporting can be done anonymously as explained below.

## 2. Scope

This Policy applies to all employees (current and previous) of Synlait, directors, secondees, or anyone engaged under a contract to provide services to Synlait, wherever they are in the world.

This Policy applies to all Synlait Milk Ltd (SML) sites.

## 3. What behaviours or activities should be reported?

Examples of behaviours or activities which are wrongdoings and are reportable under this Policy include any actual or suspected:

- Dishonest or illegal practices;
- Breach of Synlait's Code of Ethics or other policy
- Sexual harassment;
- Bullying, discrimination or intimidation of any kind;
- Corruption of any kind;
- Theft or fraud of any kind;
- Conduct creating a serious health and/or safety risk.

## 4. Reporting procedure

You are encouraged to report the behaviours or activities to one of the following Synlait Disclosure Officers (**Officers**):

- Director, People, Culture, Performance or an HR Manager;
- Director, Legal, Risk and Governance; or
- Chief Executive Officer.

Alternatively, if you feel more comfortable a report can be made at any time using an independent hotline service, managed by KPMG. This can be done by:

1. Calling the *FairCall* hotline, available 24 hours a day – **0800 100 526**; or
2. Accessing the online reporting platform – <https://www.kpmgfaircall.kpmg.com.au/Synlait>;



## WHISTLEBLOWER POLICY

Document No: 05294

Revision: 1

Issue Date: 14 May 2019

Owner: Director - Legal, Risk and Governance

Page: 2 of 4

3. Reports or additional call information can also be mailed to a secure mailbox at the following address:

The *FairCall* Manager  
KPMG Forensic  
PO Box H67  
Australia Square  
Sydney NSW 1213  
Australia

Anyone accessing the KPMG *FairCall* service can review the KPMG Australia Privacy statement, available at <http://www.kpmg.com/AU/faircallprivacy>.

Anyone making a report must include enough information about the situation to allow a thorough and fair investigation to take place. All reports must be done in good faith, be truthful and be able to be substantiated.

If no action is taken within 20 working days of a report of serious wrongdoing or if you believe the Director, Legal, Risk and Governance or Chief Executive may be involved in serious wrongdoing, you may raise your concern directly with the Chairman of the Board Audit and Risk Committee or Chairman of the Board.

## 5. Investigations

The recipient of a report made will review the information provided with one other Disclosure Officer, and together will consider whether a full investigation is required.

Reports made through the external hotline may be shared with the following to assess and, if required, investigate (in order):

1. Director, Legal, Risk and Governance and the CEO;
2. Director, People, Culture and Performance (if the report relates to either of the roles above);
3. Chair of the Audit and Risk Committee.

The assessment outcome will be reported back to the whistleblower **within 20 working days of the initial report**.

If required, a full investigation will be led by one of the Disclosure Officers or their nominee as soon as practically possible. If appropriate, an investigation may involve external parties.

Anyone accused of serious wrongdoing will have the right to answer the allegation.

If the initial report was not made anonymously, the whistleblower will be able to be heard during the investigation and will be updated on progress as appropriate.

## 6. Protections for whistleblowers

Where someone is making a report anonymously, Synlait will ensure all reasonable steps are taken to keep their identity confidential. In some situations, this may not be possible, including where:

- The identification of the whistleblower is essential to prevent serious risk to public health and/or safety, the environment, or Synlait's reputation; or
- A court order requires identification.



## WHISTLEBLOWER POLICY

Document No: 05294

Revision: 1

Issue Date: 14 May 2019

Owner: Director - Legal, Risk and Governance

Page: 3 of 4

Any information disclosed as part of the reporting process will be treated confidentially and only shared to the extent required to conduct a thorough and fair investigation.

No-one reporting a serious wrongdoing will face disciplinary action or other retaliation as a result of the reporting, as long as the reporting was done in good faith.

Leon Clement  
Chief Executive Officer  
Synlait Milk Limited

Deborah Marris  
Director Legal, Risk and Governance  
Synlait Milk Limited



## WHISTLEBLOWER POLICY

Document No: 05294

Revision: 1

Issue Date: 14 May 2019

Owner: Director - Legal, Risk and Governance

Page: 4 of 4

### 7. Revision History

This policy's revision history is available in Master Control. To access please contact the Master Control Administrator.



DOCUMENT NUMBER:

DOCUMENT TITLE:

DOCUMENT NOTES:

### Document Information

Revision:

Vault:

Doc Type:

Status:

### Date Information

Effective Date:

Expiration Date:

Release Date:

Next Review Date:

Approvals are located on Signature Manifest on back of Document.

### Control Information

Author:

Previous Number:

Owner:

Change Number:

All dates and times are in:

## Signature Manifest

**Document Number:** 05294

**Revision:** 1

**Title:** Whistleblower Policy

All dates and times are in NZ Time.

### 05294 Whistleblower Policy

#### Step 1 - Change Request Approval

Name/Signature	Title	Date	Meaning/Reason
Margaret Stewart (MSTEWART)		10 May 2019, 04:58:55 PM	Approved

#### Step 2 - Authoring Collaboration

Name/Signature	Title	Date	Meaning/Reason
Jake Couper (JCOUPER)		13 May 2019, 05:13:12 PM	Complete
Margaret Stewart (MSTEWART)		14 May 2019, 09:55:31 AM	Complete

#### Step 3 - Dept Mgr / Author Approval

Name/Signature	Title	Date	Meaning/Reason
Curtis Morton (CMORTON)		14 May 2019, 09:58:38 AM	Approved

#### Step 4 -Effective Date Release

Name/Signature	Title	Date	Meaning/Reason
Margaret Stewart (MSTEWART)		14 May 2019, 01:53:18 PM	Approved

#### Quick Approval

#### Approve Now

Name/Signature	Title	Date	Meaning/Reason
Margaret Stewart (MSTEWART)		15 May 2019, 01:01:09 PM	Approved