

This policy applies to all Synlait Milk Limited (Synlait) sites.

Synlait Milk Limited shall achieve this by:

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 serious wrongdoing is, where those serious wrongdoings can be reported to, and how Synlait will deal with reported serious wrongdoings.

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.

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.

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.

What behaviours or activities should be reported?

Serious wrongdoing¹ includes any act, omission, or course of conduct in (or by) any person(s) that is:

- (a) an offence at law
- (b) a serious risk to public health, public safety, the health, or safety of any individual, or the environment
- (c) a serious risk to the maintenance of law, including the prevention, investigation and detection of offences and the right to a fair trial.
- (d) an unlawful, a corrupt, or an irregular use of company funds or public resources and funding
- (e) oppressive, unlawfully discriminatory, grossly negligent, or equates to gross mismanagement.

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

- Dishonest or illegal practices
- Breach of Synlait's Code of Ethics or other Synlait Policy
- Sexual harassment
- Bullying, discrimination, or intimidation of any kind

¹ Protected Disclosures (Protection of Whistleblowers) Act 2022

- Corruption of any kind
- Theft or fraud of any kind
- Conduct creating a serious health and/or safety risk.

Reporting procedure

Wrongdoing is a breach of 01689 Synlait Standards Policy and should be reported to either:

- The relevant supervisor
- The relevant manager
- The Synlait Senior Internal Audit and Compliance Manager
- HR Business Manager (HRBM)

Serious wrongdoing is also reported to the Audit and Risk Committee.

Under the Protected Disclosures Policy, anyone wishing to report any actual, suspected or anticipated serious wrongdoing, as a protected disclosure, can do so confidentially to one of the following Synlait Disclosure Officers (**Disclosure Officers**):

- Director, People & Culture
- Head of Legal and Governance
- HR Business Managers
- Chief Executive Officer

Alternatively, if you feel more comfortable you can make a report of actual, suspected or anticipated serious wrongdoing at any time by either using the independent hotline service, managed by KPMG, or by contacting an appropriate authority.

To contact the independent hotline service:

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

The Fair Call 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 Disclosure Officer may be involved in serious wrongdoing, you may raise your concern directly with the Chair of the Audit and Risk Committee or Chair of the Board. Details on the Board of Directors and Audit and Risk Committee are available on the Synlait website

Disclosure Review

A Disclosure Officer will acknowledge receipt of your serious wrongdoing report, review the information provided by you with another Disclosure Officer, and together the Disclosure Officers will consider whether further investigation is required.

Reports made through the external hotline may be shared with any of the following to assess and, if required, to investigate:

1. Director, People and Culture
2. Head of Legal and Governance
3. HR Business Managers
4. Chief Executive Officer.
5. Chair of People, Environment and Governance Committee
6. Chair of Audit and Risk Committee

If further investigation is required, the investigation will be facilitated/led by a member of the Independent Assurance team as soon as practically possible. If appropriate, an investigation may involve external parties.

Within 20 days of the initial report, you will be informed of what has been undertaken to deal with the matter. If it is impractical to complete all actions required in this time, the Disclosure Officer will inform you of how long they expect to take to deal with the matter, update you on their progress, and inform you of what has been undertaken to deal with the matter.

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

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

Protections for Disclosers

If you make a report anonymously, Synlait will ensure all reasonable steps are taken to keep your identity confidential. In some situations, this may not be possible, including where:

- Your identity is essential to prevent serious risk to public health and/or safety, the environment, or Synlait's reputation or
- A court order requires identification

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.

For this policy to be successful, the active participation and support of all our employees is essential.

1. Document Information

1.1 Reference Documents

- Protected Disclosures (Protection of Whistle-blowers) Act 2022
- Privacy Act 2020
- 01689 Synlait Standards Policy (Code of Conduct)

Document Control

This policy is owned by the Director People and Culture who are responsible for ensuring the document and content is adhered to and for endorsing changes to this policy.

This policy will be formally reviewed annually or as the relevant legislation changes.

This document is retained in MyQDocs (Synlait's Document Control System (DCS)) and the Human Capital Management (HCM).

Changes to this Synlait policy are endorsed by the Synlait ELT and approved by the People Environment and Governance Committee

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Grant Watson

**Chief Executive Officer
Synlait Milk Limited**



Dahlia Kilkelly

**Acting Director, People and Culture
Synlait Milk Limited**