

Whistleblower Policy

- This Whistleblower Policy outlines the specific approach in supporting individuals reporting or raising concerns on actual or suspected instances of illegal, unethical, fraudulent or improper activity.
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SUMMARY

Overview

The TPC Consolidated Limited's Whistleblower Policy guides the organisation in encouraging the conduct of business activities with integrity whilst enabling people to raise concerns in safe and effective manner.

The Policy is available to all of the Company's directors and employees. It is aligned to both the Company's values and the Company's director and employee codes of conduct, reinforcing the behaviours required to ensure that the Company maintains its reputation for honesty and integrity.

All staff and Key Management Personnel are required to understand their responsibilities and comply with the spirit and the letter of the Policy at all times. It is important to remember that these internal controls are intended to prevent, deter and remedy any violation of applicable laws and regulations. The Company and our staff are committed to providing services in a manner that is safe, honest and that complies with legal obligations.

SCOPE OF THE POLICY

The TPC Consolidated Limited's Whistleblower Policy covers:

- Key Management Personnel which includes Directors, permanent employees (both part-time and full-time), contractors and consultants and their Associates.

PRINCIPLES

- To successfully reinforce a strong commitment to, and in compliance with, relevant legal and ethical obligations;
- To affirm individuals that the Company is properly addressing their concerns; and
- To avoid penalising individuals for fulfilling their responsibility in ensuring the Company's conduct meets its policies on compliance and ethics

PROCESS

Reportable Conduct

If an individual, in good faith, believes that Key Management Personnel, permanent employees, contractors, consultants or their associates, in their capacity of acting on behalf of the company, has conducted themselves improperly in regards to Company policies or the law, they should immediately report their concern to the Compliance Officer.

Examples of Reportable Conduct include:

- (a) dishonest, fraudulent or corrupt activity, including bribery or other activity in breach of the Company's Anti-bribery and Corruption Policy;
- (b) illegal activities under the relevant law or statute, regardless of whether the accused was acting on behalf of the Company at the time the conduct occurred; or
- (c) unethical activities or breaches of Company policies that impact the Company or our employees in a manner relating to the wellbeing of the parties impacted, such as but not limited to: physical, financial, environmental and reputational damages.

Communicating Reports

The Company has several channels for making a report. If an individual is not comfortable reporting to the Compliance Officer, they should report the concern to any supervisor or Key Management Personnel whom they are comfortable approaching.

Information can be provided in any format. Claims made in conversation should be documented by the person receiving the claim. The record of conversation should be signed by the whistleblower to verify it is a true account.

Any information shared about the allegations raised by a whistleblower will be de-identified to protect the whistleblower's identity and stored securely while the matter is examined.

Conducting Investigation

Upon receipt of a report, concern or complaint, the Compliance Officer may, in their discretion, conduct an investigation and may take whatever investigative, disciplinary or other action they appropriate that is fair and objective. The Company's policies on conduct and values apply at all times.

The Company and our staff will comply with all legal requests for information in a timely manner. Where separate outside legal or accounting expertise is deemed necessary, or desirable, to conduct the investigation or assess the decision of conducting an investigation, the Company will engage as appropriate to all related policies. If there are limits on what information can be shared, involved parties will advise on any limitations on the release of information.

No Retaliation

Individuals should feel comfortable and encourage to report any concerns as described above, knowing that they will be protected against retributive actions. Staff who is impacted will be offered support through the employee assistance program.

The Company will not tolerate punitive or discriminatory action by or on behalf of the Company and our Key Management Personnel, permanent employees, contractors, consultants and their associates against any individual making good faith complaints, or support in the investigation of such complaints, of transgressions relating to laws, regulations or Company policies.