Beyond Blue Limited

ACN 093 865 840

Whistleblower Policy

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Purpose

The purpose of this Policy is to foster a culture of integrity, transparency, accountability and ethical conduct by providing a safe, accessible and effective framework for reporting concerns about actual or suspected misconduct, illegal conduct, unethical behaviour or other reportable matters .

The objectives of this Policy are to:

a) encourage current and former employees, contractors, volunteers, officers, and other eligible whistleblowers to report concerns about actual or suspected misconduct, illegal conduct, unethical behaviour, or other reportable matters;
b) explain the procedures and reporting channels available to make a whistleblower disclosure;
c) support an organisational culture where people feel safe, respected and empowered to Speak Up without fear of retaliation, reprisal or adverse consequences;
d) help identify, prevent, detect and address misconduct and systemic issues at the earliest opportunity, consistent with Beyond Blue's risk management, governance and continuous improvement frameworks;
e) seek to ensure that eligible disclosures are received, assessed, investigated and resolved fairly, independently, confidentially and in a timely manner;
f) provide appropriate protections, support and safeguards for individuals who make protected disclosures, participate in investigations, or assist in raising concerns;
g) promote transparency and accountability in how Beyond Blue manages, investigates and responds to whistleblower disclosures;
h) strengthen stakeholder confidence in Beyond Blue's commitment to ethical conduct, responsible stewardship and good governance; and
i) meet Beyond Blue's legal, regulatory and ethical obligations in relation to whistleblower protection and the management of disclosures.

Commitment to Protection

Beyond Blue is committed to ensuring that individuals can Speak Up safely and not be the subject of retaliation, victimisation, harassment, discrimination, intimidation, threats or any other form of detriment because they have made, may make, or are believed to have made a disclosure under this Policy.

Any employee, contractor, volunteer, officer or other person who engages in or threatens detrimental conduct against a whistleblower or another person involved in a disclosure may be subject to disciplinary action, up to and including termination of employment, engagement or association with Beyond Blue, and may be referred to relevant authorities, where required.

This commitment reflects Beyond Blue's values and recognises that speaking up is an important part of maintaining a safe, ethical and accountable organisation.

Policy Applicability

This Policy applies to all eligible whistleblowers who report or seek to report concerns about actual or suspected misconduct, illegal conduct, unethical behaviour or other reportable matters relating to Beyond Blue.

This Policy applies to current or former:

a) employees of Beyond Blue, including permanent, part-time, fixed-term, temporary and casual employees, interns, secondees, managers and executives, including the Chief Executive Officer;
b) officers, associates and directors of Beyond Blue, including members of the Board and Company Secretary;

c) volunteers, contractors, consultants, suppliers, service providers and any other individual or organisation providing goods or services to, or undertaking activities on behalf of, Beyond Blue, including their employees and representatives;
d) individuals who are or have been involved in recruitment, engagement or employment processes with Beyond Blue, including prospective employees, contractors and volunteers; and
e) relatives, dependents, spouses or partners of any person referred to in paragraphs (a) to (d) above, or dependents of such an individual's spouse.

This Policy applies to disclosures concerning conduct occurring within Beyond Blue, arising from activities undertaken on behalf of Beyond Blue, or otherwise connected with Beyond Blue's operations, governance, services, partnerships or business relationships.

Nothing in this Policy limits any rights, protections or reporting pathways available under applicable whistleblower legislation.

Definitions

Term	Definition
Detrimental Conduct	means any actual or threatened conduct that causes, or may cause, detriment to a person because they have made, may make, or are suspected of making, a disclosure under this Policy.
Personal Work-Related Grievance	means a grievance relating to a person's current or former employment or engagement that has implications solely for that individual and does not involve broader allegations of systemic misconduct, wrongdoing or other matters covered by whistleblower protections.
Eligible Recipients	An individual authorised under applicable whistleblower laws and this Policy to receive disclosures of actual or suspected misconduct. Eligible Recipients include Whistleblower Protection Officers (**WPOs**), Directors, members of the Executive Leadership Team including the Chief Executive Officer, appointed internal and external auditors, and other persons prescribed by law.
Policy	means this Whistleblower Policy.
Protected Disclosure	A disclosure that qualifies for protection under applicable whistleblower legislation and this Policy.
Potential Misconduct	means any actual or suspected misconduct, illegal conduct, unethical behaviour, or improper state of affairs or circumstances relating to Beyond Blue including conduct that may constitute a serious breach of law, fraud, corruption, misuse of funds or assets, serious governance failure, or conduct that poses a substantial risk to Beyond Blue or the community.
Speaking Up	Means reporting, disclosing or raising concerns (verbally and/or in writing) about actual or suspected Potential Misconduct in accordance with this Policy.
"Whistleblower"	means the individual who makes, attempts to make, is considering making, or is believed to have made a disclosure under this Policy.

Term	Definition
Whistleblower Investigation Officer (WIO)	means the individual appointed to assess or investigate a disclosure under this Policy. The WIO may be an appropriately qualified internal or external investigator who is independent of the matters being investigated.
Whistleblower Protection Officer (WPO)	means an individual appointed by Beyond Blue with responsibility for overseeing the protection and welfare of whistleblowers, safeguarding confidentiality, monitoring the risk of detrimental conduct, and supporting the fair and effective operation of the whistleblower framework.

Roles and Responsibilities

Role	Responsibility
All Employees, Contractors and Volunteers	• Act in accordance with Beyond Blue's Values, Code of Conduct and related policies (as identified at the end of this Policy). • Support a culture of integrity, accountability and Speaking Up. • Refrain from victimisation, retaliation or other detrimental conduct towards a person who makes or is believed to have made, a disclosure that is protected. • Cooperate with investigations, where requested.
Audit, Finance and Risk Committee (AFRC)	• Provide governance oversight of the effectiveness of the whistleblower framework. • Monitor significant disclosures, emerging themes, risks and management actions. • Receive reports on material whistleblower matters and oversee continuous improvement activities.
Board of Directors	• Approve and oversee this Policy and the whistleblower framework. • Promote an organisational culture that supports integrity, transparency and Speaking Up. • Monitor the effectiveness of whistleblower governance arrangements and organisational responses to significant whistleblower matters.
Eligible Whistleblowers	• Speak Up where they have reasonable grounds to suspect actual or suspected misconduct, illegal conduct, unethical behaviour or other reportable matters. • Provide information that is honest, accurate and based on reasonable grounds. • Maintain confidentiality where appropriate and cooperate with any assessment or investigation process. • There is no requirement for a discloser to identify themself in order for a disclosure to qualify for protection.

Role	Responsibility
Executive Leadership Team (including the CEO)	• Promote a culture of integrity, ethical conduct and accountability. • Ensure appropriate resources, controls and support mechanisms are in place to support the whistleblower framework. • Implement actions arising from substantiated findings, where relevant.
Managers and Leaders	• Promote awareness of this Policy and encourage a safe reporting culture. • Escalate disclosures received in accordance with this Policy. • Support whistleblowers and ensure concerns are managed appropriately. • Identify and manage risks of detrimental conduct within their areas of responsibility.
Eligible Recipients	• Receive disclosures in accordance with this Policy. • Maintain confidentiality and protect information provided by whistleblowers. • Escalate disclosures to a WPO or other authorised person, where appropriate. • Support the fair and effective handling of disclosures.
Whistleblower Investigation Officer (WIO)	• If required, conduct or coordinate investigations in an objective and timely manner. • Gather and assess relevant evidence. • Maintain confidentiality and procedural fairness throughout the investigation process. • If required, prepare findings for consideration by the appropriate decision-maker.
Whistleblower Protection Officer (WPO)	• Receive and oversee disclosures made under this Policy. • Protect and safeguard the interests, wellbeing and confidentiality of whistleblowers. • Assess disclosures and determine appropriate management or investigation pathways. • Monitor for risks of retaliation, victimisation or other detrimental conduct. • Ensure whistleblowers are provided with appropriate support and protections. • Provide governance reporting and oversight of disclosures.

Policy

Beyond Blue is committed to maintaining the highest standards of integrity, accountability and ethical conduct. We encourage individuals to Speak Up about actual or suspected misconduct, illegal conduct, unethical behaviour or other reportable matters and are committed to ensuring they can do so safely, confidentially and without fear of retaliation. This Policy provides the framework for receiving, managing and responding to disclosures, protecting those who Speak Up, and supporting a culture of transparency, trust and continuous improvement.

What matters can be reported under the Policy

Examples of Potential Misconduct

Beyond Blue encourages individuals to Speak Up about actual or suspected misconduct, illegal conduct, unethical behaviour or other reportable concerns.

When making a disclosure, you should provide as much information as possible, including details of the conduct, individuals involved, dates, locations, supporting evidence, and any other information that may assist in the assessment or investigation of the matter.

Examples of Potential Misconduct may include, but are not limited to:

- breaches of certain laws, regulations, licence conditions or other legal obligations;
- fraud, theft, misappropriation of funds, assets or resources, or any other form of financial misconduct;
- bribery, corruption, facilitation payments, kickbacks, or the improper offering, giving, soliciting or acceptance of benefits;
- falsification, concealment, destruction or manipulation of records, documents, data, reports or other information;
- misleading or deceptive conduct, including inaccurate financial, taxation, regulatory, operational or performance reporting;
- misuse of Beyond Blue's funds, assets, intellectual property, systems, information or resources;
- unauthorised access to, disclosure of, theft of, or misuse of confidential, personal, commercially sensitive or organisational information;
- deliberate circumvention of security controls, inappropriate use of technology, or misuse of artificial intelligence, automated systems or digital tools;
- serious or systemic breaches of Beyond Blue's Code of Conduct, policies, standards, delegations or governance requirements;
- undisclosed, unmanaged or improperly managed conflicts of interest;
- safeguarding concerns involving participants, consumers, volunteers, employees, contractors or other stakeholders;
- modern slavery, human trafficking, forced labour, servitude, debt bondage, forced marriage or other forms of exploitation;
- engaging in, threatening, or attempting to cause detriment to a person because they have made, may make, or are believed to have made, a disclosure under this Policy; and
- deliberately concealing, assisting, facilitating or attempting to conceal any of the matters described above.

Knowingly False or Misleading Reports

Beyond Blue encourages individuals to Speak Up where they have reasonable grounds to suspect concerns about actual or suspected misconduct, illegal conduct, unethical behaviour or other reportable matters covered by this Policy. A person does not need to prove that an allegation is true before making a disclosure and will not be disadvantaged because a concern raised in good faith is subsequently unsubstantiated.

However, disclosures that are knowingly false, misleading, frivolous, vexatious or made with malicious intent are not protected under this Policy.

A person who knowingly makes a false report, deliberately provides misleading information, or intentionally makes allegations they know to be untrue may be subject to disciplinary action.

The fact that a disclosure is not substantiated, is unable to be substantiated, or is ultimately found to be incorrect does not, by itself, mean that the disclosure was false, misleading or made in bad faith.

Beyond Blue is committed to fostering a culture where concerns can be raised without fear of reprisal and encourages individuals to Speak Up where they genuinely believe misconduct or wrongdoing may have occurred.

Personal work-related grievances

This Policy does not replace existing processes for managing workplace concerns, employment matters or people-related issues.

Generally, disclosures that relate to a person's individual employment or otherwise constitute a personal work-related grievance, without having broader implications for Beyond Blue or evincing systemic misconduct, are not covered by this Policy and should be managed through the appropriate People and Culture, grievance, workplace conduct, or dispute resolution processes.

Examples of personal work-related grievances may include:

- interpersonal disagreements or conflicts between individuals;
- concerns about performance management, performance reviews or feedback;
- decisions relating to recruitment, engagement, transfer or promotion;
- decisions relating to changes to duties, reporting lines, work arrangements, remuneration, or other terms and conditions of employment or engagement;
- decisions relating to disciplinary action, suspension or termination of employment or engagement; and
- other workplace concerns that affect the individual personally and do not involve broader misconduct, wrongdoing or systemic issues.

When a Personal Work-Related Grievance May Be a Whistleblower Matter

A personal work-related grievance may still qualify for protection under this Policy where it includes concerns about actual or suspected misconduct of a systemic nature, illegal conduct, unethical behaviour or other matters that have broader implications beyond the individual circumstances of the person raising the concern.

Examples include where the disclosure involves:

- fraud, corruption, bribery, conflicts of interest, misuse of funds, assets, information or organisational resources;
- breaches of certain laws, regulatory obligations, governance requirements or Beyond Blue policies;
- retaliation, victimisation, intimidation or other detrimental conduct because a person has made, intends to make, or is suspected of making, a disclosure;
- systemic workplace issues or conduct that impacts multiple people;

- conduct that creates a significant risk to the health, safety, wellbeing or psychological safety of more than one person;
- safeguarding concerns or conduct that may harm beneficiaries, volunteers, workers or other stakeholders;
- serious or systemic breaches of privacy, information security or cyber security requirements;
- conduct that poses a risk to Beyond Blue's reputation, operations, assets, services or the public; or
- deliberate attempts to conceal any of the above conduct.

How to Speak Up

How to report Potential Misconduct

Individuals are encouraged to Speak Up about actual or suspected misconduct, illegal conduct, unethical behaviour or other reportable matters as early as possible.

A disclosure may be made to a WPO, an Eligible Recipient, or another person authorised by law to receive protected disclosures.

Beyond Blue's WPOs are:

- Georgie Harman, Chief Executive Officer
- Linda Dessau, Board of Directors, Chair
- Denise McComish, AFRC, Chair
- Adrian Marshall, Head of Assurance and Privacy Officer

Current contact details for WPOs are maintained by Beyond Blue and are available on the intranet, through People and Culture, or upon request.

A disclosure may also be made to an Eligible Recipient, including:

- members of the Executive Team, or Directors of Beyond Blue;
- the internal auditors (Quality and Safety Manager) and external auditors (Deloitte) of Beyond Blue; or
- any other person prescribed as an eligible recipient under applicable whistleblower legislation.

Unless inappropriate to do so, disclosures received by an Eligible Recipient will be referred to a WPO for assessment, protection and ongoing management under this Policy.

Where a disclosure involves, or may reasonably be perceived to involve, the CEO, a member of the Executive Leadership Team, a Board Director, the Board Chair, an AFRC member, a Whistleblower Protection Officer, a Whistleblower Investigation Officer, or any other person with an actual, potential or perceived conflict of interest, the disclosure must be managed in accordance with the "Disclosures Involving Senior Personnel" section of this Policy. In those circumstances, the disclosure must not be referred to, assessed by, investigated by, decided by, reported through, or overseen by any person who is the subject of, implicated in, or conflicted in relation to the disclosure.

Nothing in this Policy prevents an individual from making a disclosure to a regulator, law enforcement agency or other external body authorised to receive protected disclosures under applicable laws.

Depending on the circumstances, disclosures may be made to bodies such as:

- the Australian Securities and Investments Commission (ASIC);
- the Australian Charities and Not-for-profits Commission (ACNC);
- the Australian Prudential Regulation Authority (APRA), where applicable;
- law enforcement agencies; or
- other regulators authorised to receive protected disclosures.

Disclosures may also be made to a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to whistleblower protections and reporting obligations.

Public Interest and Emergency Disclosures

In limited circumstances, whistleblower legislation may permit a protected disclosure to be made to a journalist or parliamentarian as a public interest disclosure or emergency disclosure.

Strict legal requirements apply to these disclosures, and not all disclosures will qualify for protection. Individuals considering making a public interest or emergency disclosure are strongly encouraged to obtain independent legal advice before doing so.

Disclosures Involving Senior Personnel

Where a disclosure concerns, or may reasonably be perceived to involve, the CEO, a member of the Executive Leadership Team, a Board Director, the Board Chair, a member of the Audit, Finance and Risk Committee, a Whistleblower Protection Officer, a Whistleblower Investigation Officer, or any other person with an actual, potential or perceived conflict of interest, the disclosure must be managed through an independent and non-conflicted pathway.

A person who is the subject of a disclosure, implicated in the matters disclosed, may be a witness, or has an actual, potential or perceived conflict of interest must not receive, assess, investigate, decide, report on, or exercise oversight in relation to that disclosure, except where required by law or expressly authorised by an appropriately independent decision-maker.

Where a disclosure is made to a person who is conflicted, that person must not take any substantive step in relation to the matter other than, where necessary and appropriate, to promptly refer the disclosure to a non-conflicted Whistleblower Protection Officer, Eligible Recipient, Board Chair, Audit, Finance and Risk Committee Chair, independent Director, external investigator, legal adviser, regulator or other authorised external recipient.

For the avoidance of doubt, the following escalation pathways apply:

Disclosure involves	Disclosure should be made to	Oversight / decision-maker
CEO	Board Chair, AFRC Chair, another independent Director, external auditor, legal adviser or regulator	Board Chair, or another independent Director if the Board Chair is conflicted
Board Chair	AFRC Chair, another independent Director, external auditor, legal adviser or regulator	AFRC Chair, or another independent Director if the AFRC Chair is conflicted
Board Director	Board Chair, AFRC Chair, another independent Director, external auditor, legal adviser or regulator	Board Chair, or another independent Director if the Board Chair is conflicted
AFRC Chair or AFRC member	Board Chair, another independent Director, external auditor, legal adviser or regulator	Board Chair, or another independent Director if the Board Chair is conflicted

Disclosure involves	Disclosure should be made to	Oversight / decision-maker
Executive Leadership Team member	CEO, Board Chair, AFRC Chair, non-conflicted WPO, external auditor, legal adviser or regulator	CEO, unless conflicted, in which case the Board Chair, AFRC Chair or another independent Director
Whistleblower Protection Officer or Whistleblower Investigation Officer	Another WPO, Board Chair, AFRC Chair, another independent Director, external auditor, legal adviser or regulator	Board Chair, AFRC Chair, another independent Director or independent external adviser
Multiple senior personnel or systemic governance issue	Board Chair, AFRC Chair, independent Director, external auditor, legal adviser, regulator or other authorised external recipient	Independent Board-led process, with external investigation where appropriate

Where all internal pathways are conflicted, unavailable, inappropriate or impractical, the disclosure may be made directly to an authorised external recipient, including a legal practitioner, external auditor, ASIC, ACNC, law enforcement agency, or another regulator authorised to receive protected disclosures.

Confidential and Anonymous Disclosures

Individuals may make a disclosure openly, confidentially or anonymously.

Beyond Blue respects the right of individuals to choose how they make a disclosure and is committed to protecting the identity of whistleblowers possible, in accordance with applicable laws.

Confidential disclosures

If you disclose your identity to an Eligible Recipient, it will be kept confidential unless you provide your consent to your identity being disclosed. This option often assists the WPO or WIO to investigate the concerns being raised, as further information can be requested from you.

Anonymous disclosures

You may make a disclosure anonymously and remain anonymous throughout the reporting, investigation and post-investigation process. You may also choose to reveal your identity at a later stage.

The WPO or WIO will assess and investigate anonymous disclosures where it is reasonably practicable to do so. However, anonymity may affect Beyond Blue's ability to seek additional information, verify certain facts, provide updates on the progress of the matter, or offer direct wellbeing and support measures.

A person who makes an anonymous disclosure is entitled to the same protections under this Policy and applicable whistleblower laws as a person who identifies themselves, provided the disclosure otherwise qualifies for protection under the Policy.

What protection exists if I Speak Up under the Policy?

Protecting your identity

Beyond Blue is committed to protecting the identity and confidentiality of individuals who Speak Up.

The identity of a whistleblower, and any information that is likely to lead to their identification, will be protected and handled in accordance with applicable whistleblower laws and privacy obligations. Beyond Blue will not disclose a whistleblower's identity or information that is likely to identify them unless:

- the whistleblower provides their consent;
- the disclosure is made to a regulator, law enforcement agency, legal adviser or other person authorised by law; or
- the disclosure is otherwise permitted or required by law.

Reasonable steps will be taken to reduce the risk that a whistleblower's identity may be disclosed indirectly, including through information contained in investigation materials, reports, communications or records.

All disclosures, investigation materials, evidence, records and related information will be stored securely and managed in accordance with Beyond Blue's information security, privacy and records management requirements. Access will be restricted to individuals who have a legitimate need to know in order to receive, assess, investigate, support, respond to or oversee the disclosure.

Where practicable, information will be de-identified, redacted or otherwise protected to minimise the risk of identifying a whistleblower. Individuals involved in the handling or investigation of a disclosure are required to maintain strict confidentiality and protect the privacy of all parties involved.

Beyond Blue recognises that maintaining confidentiality is critical to ensuring that individuals feel safe to Speak Up. A failure to protect a whistleblower's identity or confidential information may constitute a breach of this Policy and may result in disciplinary action, as well as potential legal consequences.

If you believe that your identity has been disclosed improperly, confidentiality has been breached, or you have experienced retaliation or detrimental conduct because you have made a disclosure, you are encouraged to report your concerns to the WPO. You may also seek advice from, or make a complaint to, an eligible regulator or other external body where permitted by law.

Support Available to Whistleblowers

Beyond Blue recognises that making a disclosure can be a difficult and stressful experience. Individuals who Speak Up may require practical, emotional or workplace support before, during and after the assessment or investigation of a disclosure.

Beyond Blue is committed to supporting whistleblowers and taking reasonable steps to safeguard their wellbeing, safety, privacy and psychological health throughout the disclosure process.

Depending on the circumstances, available support measures may include:

- access to confidential wellbeing support services, such as the Employee Assistance Program (EAP) or other counselling services;
- risk assessments to identify and manage the risk of retaliation, victimisation or other detrimental conduct;
- reasonable adjustments to work arrangements, reporting lines, duties or work locations, where necessary, to protect the whistleblower or maintain the integrity of an investigation;
- access to information about the whistleblower process, available protections and support options; and
- any other support considered reasonable and appropriate in the circumstances.

The nature and extent of support provided will depend on the circumstances of the disclosure, the needs of the individual and the level of risk identified.

Whistleblowers are encouraged to raise any concerns regarding their wellbeing, safety or support needs with the WPO, who will work with relevant stakeholders to implement reasonable measures to support and protect them.

Protecting you from detriment

Beyond Blue is committed to ensuring that individuals can Speak Up without fear of retaliation, victimisation or other detrimental conduct.

A person who makes, intends to make, assists with, or is suspected of making a disclosure under this Policy must not be subjected to detriment because of that intention, assistance, suspicion or disclosure.

Examples of detrimental conduct may include, but are not limited to:

- dismissal, suspension or demotion;
- disciplinary action or adverse treatment in relation to employment, engagement or volunteering activities;
- alteration of a person's role or duties to their disadvantage;
- discrimination, victimisation, bullying, harassment, intimidation, coercion or threats;
- exclusion from workplace activities, opportunities, training, promotion or professional development;
- damage to a person's reputation;
- physical or threatened physical harm or injury, including psychological injury;
- online abuse, inappropriate monitoring, surveillance or other forms of retaliation;
- adverse treatment of a person's family members, dependants, associates or colleagues because of a disclosure; or
- any act or omission that causes detriment to a person because they have made, may make, or are believed to have made a disclosure.

Reasonable Management Action

Detrimental conduct does not include reasonable management action that is carried out lawfully and in a reasonable manner.

Examples may include:

- managing performance concerns in accordance with Beyond Blue's policies and procedures;
- addressing misconduct or behavioural issues in accordance with Beyond Blue's policies and procedures;
- making operational or organisational decisions that are unrelated to a disclosure; or
- taking reasonable action to protect a whistleblower or the integrity of an investigation, such as modifying reporting lines, work arrangements or duties, provided that the action is taken in consultation with the individual wherever practicable and does not disadvantage them.

Reporting Detrimental Conduct

If you believe you have experienced, witnessed or been threatened with detrimental conduct in connection with a disclosure, you should report the matter immediately to the WPO or another eligible recipient.

Beyond Blue will treat reports of detrimental conduct seriously, respond promptly, and take appropriate action to protect affected individuals and prevent further harm. Reports of detrimental conduct will be handled confidentially to the fullest extent possible.

Individuals may also seek independent legal advice or report concerns to an appropriate regulator where permitted by law.

Breaches of this Policy

Any employee, contractor, volunteer, officer or other person who engages in, directs, facilitates or threatens detrimental conduct may be subject to disciplinary action.

Depending on the circumstances, this may include counselling, formal warnings, removal from duties, termination of employment or engagement, termination of contractual arrangements, referral to relevant authorities, or other actions considered appropriate by Beyond Blue.

Legal Protection for Whistleblowers

Where a disclosure qualifies for protection under applicable whistleblower laws, the person making the disclosure may be entitled to legal protections in relation to making that disclosure.

Subject to the requirements of applicable legislation, a whistleblower may be protected from certain civil, criminal and administrative liability for making a protected disclosure.

However, these protections apply to the act of making the disclosure and do not protect a whistleblower from the consequences of any misconduct, unlawful conduct or improper behaviour in which they may have been involved.

A whistleblower may still be subject to investigation or appropriate action arising from their own misconduct, where warranted.

Compensation and other remedies

A person who suffers loss, damage or injury as a result of detrimental conduct, may be entitled to seek compensation, damages or other remedies available under applicable whistleblower laws.

Individuals who believe they have suffered loss, damage or injury as a result of detrimental conduct are encouraged to report the matter to the WPO so that Beyond Blue can take appropriate steps to address the concern and prevent further harm. Individuals may also seek independent legal advice regarding their rights and available remedies.

What happens once a report is made?

Investigating the disclosure

Beyond Blue is committed to ensuring that disclosures made under this Policy are assessed and, where appropriate, investigated in an objective and confidential manner. All disclosures will be treated seriously and considered on their merits.

The nature and extent of any action taken in response to a disclosure will depend on the circumstances of the matter, including the nature of the allegations, the information available, the level of risk involved, and whether there is sufficient information to enable further assessment or investigation. Not all disclosures will result in a formal investigation; however, all disclosures will be appropriately assessed by the WPO or their delegate.

Following an initial assessment, Beyond Blue may determine that the matter:

- requires a formal investigation;
- can be addressed through another appropriate process;
- should be referred to an internal or external specialist;
- should be referred to a regulatory, law enforcement or other external authority; or
- does not require further action, including where there is insufficient information or no reasonable basis to proceed.

Where a formal investigation is required, the WPO will appoint a suitably qualified and independent investigator, which may be the WIO, another internal investigator, or an appropriately qualified external investigator. The investigator will conduct the investigation independently, objectively and without bias and may seek specialist advice or assistance, where appropriate.

Where a disclosure involves senior personnel or any conflicted person, the appointment of the investigator, the scope of the investigation and any related decision-making must be managed in

accordance with the “Disclosures Involving Senior Personnel” section of this Policy. Any investigator, decision-maker or person exercising oversight must be independent of the matters being investigated and free from any actual, potential or perceived conflict of interest.

Investigations will be conducted in a manner that:

- protects the confidentiality of the whistleblower and other individuals involved, so far as reasonably practicable;
- complies with applicable legal, privacy and information security requirements;
- affords procedural fairness to persons who are the subject of allegations;
- manages actual, potential or perceived conflicts of interest; and
- minimises the risk of retaliation, victimisation or other detrimental conduct.

Individuals who are the subject of a disclosure will generally be informed of the substance of the allegations relevant to them and provided with an opportunity to respond, subject to any legal, confidentiality, safety or investigation integrity considerations.

Beyond Blue expects employees, contractors, volunteers and other relevant parties to cooperate with any investigation undertaken under this Policy.

All records, evidence, information and investigation materials relating to a disclosure will be managed securely and access will be restricted to authorised individuals who have a legitimate need to know.

At the conclusion of the investigation, findings will be provided to the WPO or appropriate decision-maker for consideration. Beyond Blue will determine and implement any actions necessary to address identified issues, strengthen controls, improve governance, manage risks, or remediate misconduct, where appropriate.

Beyond Blue is committed to taking appropriate action in response to substantiated findings and to using insights from disclosures and investigations to support continuous improvement, risk management, ethical conduct and organisational learning.

Keeping you informed

Where your identity is known, or you have established an anonymous method of communication, Beyond Blue will seek to keep you appropriately informed throughout the assessment and investigation process, subject to legal, privacy, confidentiality and operational considerations.

Where practicable, updates may be provided regarding:

- acknowledgement and receipt of the disclosure;
- whether the disclosure has been assessed and accepted for further review or investigation;
- the progress of any investigation or other action being undertaken;
- any significant delays affecting the handling of the matter; and
- the conclusion of the assessment or investigation process.

The extent of information that can be shared will depend on the circumstances of the matter and Beyond Blue's legal and confidentiality obligations.

To protect the privacy of all individuals involved and maintain the integrity of any investigation, Beyond Blue may be unable to provide detailed information about investigation findings, disciplinary actions, employment outcomes, legal proceedings, or actions taken.

Reporting

The WPO will ensure that appropriate governance oversight is maintained in relation to disclosures made under this Policy. Significant disclosures, investigation outcomes, emerging themes, material risks, and any

actions taken in response to substantiated findings may be reported to the Board and the AFRC, subject to confidentiality, privacy and legal considerations.

Reporting to the Board or AFRC will be conducted in a manner that protects the identity of whistleblowers and other individuals involved, unless disclosure is authorised, required or permitted by law.

The Board and AFRC are responsible for oversight of the effectiveness of Beyond Blue's whistleblower framework, including reviewing significant whistleblower matters, monitoring organisational responses, and maintaining oversight of whistleblower risks, trends and control effectiveness.

Where a disclosure involves, or may reasonably be perceived to involve:

- the Chief Executive Officer;
- a member of the Executive Leadership Team;
- a Board Director;
- a member of the AFRC;
- the WPO;
- the WIO; or
- any person with an actual, potential perceived conflict of interest,

that individual will not participate in the assessment, investigation, decision-making, reporting or oversight processes relating to the disclosure.

In these circumstances, Beyond Blue will appoint an alternative independent decision-maker, investigator, eligible recipient or governance body, as appropriate, to ensure the matter is managed impartially and without undue influence.

All actual, potential and perceived conflicts of interest associated with a disclosure will be identified, declared and managed throughout the assessment, investigation and reporting process.

Compliance

Non-compliance with this Policy may result in disciplinary action. The severity of the breach will determine the action to be taken.

Review

This Policy will be reviewed every two (2) years by the Board or as otherwise required to ensure it remains consistent with the Board's objectives and responsibilities.

Related Documents

- Beyond Blue Values and Code of Conduct
- Fraud and Corruption Prevention Policy
- Gifts, Benefits & Hospitality Policy
- Grievance Management Policy
- Privacy Policy
- Data Breach Response Plan
- Risk Management Framework
- Delegations of Authority Policy
- Board Governance Charter
- AFRC Terms of Reference
- Conflict of Interest Policy
- Fraud and Corruption Investigation Procedure

Document Control

Approved by	Date approved	Responsible position
Board of Directors	30 September 2026	Chief Operations Officer

Revision Record

Date	Version	Revision description
4 October 2012	1.0	Draft for review by AFRC
16 October 2012	1.0	Approved by Board of Directors
13 February 2018	1.1	AFRC Endorsed for Board Approval
6 March 2018	1.1	Draft for endorsement by the Board
30 January 2019	1.1	AFRC Endorsed for Board Approval – branding changes and amendment to biennial review
19 February 2019	1.1	Approved by Board of Directors
7 May 2019	1.2	AFRC Endorsed for Board approval - changes to reflect whistleblower legislation following the passing of the Commonwealth Government's Treasury Laws Amendment (Enhancing Whistleblower Protections) Bill 2018 in February 2019 and Royal Assent in March 2019
28 May 2019	1.2	Approved by Board of Directors
4 February 2020	1.3	AFRC endorsed for Board approval – changes to reflect ASIC issued RG 270 Whistleblower policies released in November 2019
25 February 2020	1.3	Approved by Board of Directors
25 January 2022	1.4	AFRC endorsed for Board approval – minor changes
1 February 2024	1.5	AFRC endorsed for Board approval – reviewed against Part 9.4AAA of the corporations Act and ASIC Regulatory Guide 270
30 September 2026	2.0	Policy comprehensively reviewed and updated to align with current policy architecture, contemporary whistleblower governance requirements and organisational arrangements. Includes revised structure, expanded scope and definitions, clarified roles and responsibilities, enhanced protections and investigation processes, strengthened governance reporting, and updated related documents.