BRAVUS

Whistleblower

Standard

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Definitions and terms

Term	Meaning
ASIC	Australian Securities and Investments Commission
APRA	Australian Prudential Regulation Authority
BAS	Business Activity Statement
Bravus Australia	Means, jointly and severally, the Bravus Australia Companies.
Bravus Australia Company	A Bravus Australia Company is any of: • Adani Australia Pty Ltd (ACN 625 679 852) t/a Bravus Australia; • Adani Infrastructure Pty Ltd (ACN 606 764 827); • Adani Mining Pty Ltd (ACN 145 455 205) T/A Bravus Mining & Resources; • Adani Rugby Run Pty Ltd (620 965 755) ATF the Adani Rugby Run Trust; • Bowen Rail Company Pty Ltd (ACN 638 074 889); • Carmichael Rail Network Pty Ltd (601 738 685) ATF the Carmichael Rail Network Trust; • Carmichael Rail Network Holdings Pty Ltd (601 738 943) ATF the Carmichael Rail Operations Trust; and any Australian registered subsidiary, holding company, related body corporate, associated entity or related parties (as those terms are defined in the Corporations Act 2001 (Cth)) of any of the entities listed above.
Confidential identity information	The identity of a discloser, or information that may lead to the identification of a discloser.
Detriment	Includes (without limitation) dismissal, harassment or intimidation, harm or injury (including psychological harm), damage to a person's property, and reputational, financial, or any other damage to a person.
Discloser	Any current or former director, officer, employee, supplier, consultant, contractor, or associate of Bravus Australia (or, in certain circumstances, a relative, spouse, or dependant of any of them) who makes a report in accordance with this Standard.
EAP	Employee Assistance Program
Eligible recipient	A person within Bravus Australia to whom a report may be made, being officers, directors, and senior managers, and internal or external auditors (or a member of an audit team conducting an audit).
Personal work related grievance	A grievance about any matter in relation to a discloser's employment, or former employment, having (or tending to have) implications for the discloser personally.
Protected disclosure	An eligible disclosure that qualifies for protection under the whistleblower regime.
Reportable matter	Information that an eligible whistleblower has reasonable grounds to suspect concerns misconduct, or an improper state of affairs or circumstances, or other conduct of the kind described in this Standard.

SHMS	Safety Health Management System
WPO	Whistleblower Protection Officer

1 Purpose and Objectives

Bravus Australia encourages and supports reporting of suspected wrongdoing as soon as possible, without fear of reprisal, retaliation or intimidation.

Bravus Australia takes all concerns raised seriously and relies on you to raise your concerns so that it can deal with any substantiated wrongdoing within Bravus Australia. Bravus Australia is committed to ensuring that individuals who disclose wrongdoing in accordance with this Whistleblower Standard Standard) can do so safely, securely and with confidence that they will be protected and supported.

The purpose of this Standard is to:

- promote a culture of ethical behaviour and accountability, and prevent and address wrongdoing when it occurs;
- encourage the raising of any concerns about suspected or actual misconduct, wrongdoing or any improper state of affairs in relation to Bravus Australia, without fear of reprisal or intimidation;
- set out details of the avenues available for raising any concerns of suspected wrongdoing; and
- explain how Bravus Australia will deal with disclosures it receives.

This Standard will be made available on the Company's internal and external internet pages. Copies of this Standard can also be obtained from a Whistleblower Protection Officer.

This Standard applies to Bravus Australia and its related bodies corporate as defined in this Standard.

2 Protections for Whistleblowers

In Australia, the *Corporations Act 2001 (Cth)* and the *Taxation Administration Act 1953 (Cth)* provide for protection of whistleblowers.

Eligible disclosures are called "protected disclosures".

You can make a "protected disclosure" if:

- you are an "eligible whistleblower" (see section 3); and
- the disclosure you make is about "a reportable matter" (see section 4); and
- you make the disclosure directly to a person who is eligible to receive a protected disclosure (see section 5).

If you make a disclosure that meets all of these requirements, you will qualify for protection under the whistleblower regime. This is the case even if your disclosure later turns out to be incorrect.

3 Who Can Make a Disclosure

Disclosures may be made under this Standard by any current or former:

- director, officer or employee of Bravus Australia;
- suppliers, consultants, and contractors of a Bravus Australia Company (including their employees, whether paid or unpaid);
- associates of Bravus Australia; and
- in certain circumstances, relatives, spouses and dependants of any of the above individuals.

A **discloser** is any of the above individuals who makes a report in accordance with this Standard.

A discloser may also be eligible for protection as a whistleblower under the *Corporations Act 2001 (Cth)* in certain circumstances.

4 Reportable Matters

4.1 Matters That Qualify As Reportable Matters

Only disclosures of certain types of information will qualify for protection.

Information is a "reportable matter" if the eligible whistleblower has reasonable grounds to suspect that the information disclosed (reportable matters):

- concerns misconduct or an improper state of affairs or circumstances in relation to Bravus Australia or an officer or employee of Bravus Australia. Misconduct includes, for example, fraud, negligence, default, breach of trust and breach of duty. Conduct does not necessarily need to be "unlawful" to fall within the scope of "misconduct or an improper state of affairs or circumstances", and may include:
    - systemic improper conduct within Bravus Australia that is causing, or may cause, harm;
    - conduct that indicates a significant risk to public safety or the financial system;
    - conduct that is not in the interests of the public; or
    - unsafe work practices and other significant safety concerns;
- indicates that Bravus Australia or any employee or officer has engaged in conduct that:
    - constitutes a contravention of specific legislation, including the *Corporations Act, Australian Securities and Investments Commission Act 2001, Banking Act 1959, Financial Accountability Regime Act 2023, Financial Sector (Collection of Data) Act 2001, Insurance Act 1973, Life Insurance Act 1995, National Consumer Credit Protection Act 2009, Superannuation Industry (Supervision) Act 1993*; or
    - constitutes an offence against any other law of the Commonwealth that is punishable by at least 12 months' imprisonment; or
    - represents a danger to the public or the financial system;
- concerns misconduct or an improper state of affairs or circumstances in relation to the tax affairs of Bravus Australia or an associate of Bravus Australia, and the information may assist the eligible recipient to perform their functions or duties in relation to the tax affairs of Bravus Australia or an associate of Bravus Australia.

4.1.1 Reasonable Grounds

There must be "reasonable grounds" for a report made under this Standard.

An example of where you will unlikely have "reasonable grounds" to suspect alleged wrongdoing is where you make a deliberately false report. A mere allegation with no supporting information is unlikely to be considered as having ‘reasonable grounds’. However, you do not need to prove the allegations. You will still qualify for protection under this Standard even if your disclosure turns out to be incorrect.

The reporting of false information is taken very seriously by Bravus Australia. Individuals who deliberately or knowingly report false information will not be able to access the protections available under this Standard, and individuals who are employees, officers or contractors of a Bravus Australia Company may be subject to disciplinary action.

4.1.2 Safety or Work Practices Concerns

Where there are alleged unsafe work practices or safety concerns, Bravus Australia encourages employees to raise these concerns through the Safety Health Management System (SHMS) reporting processes (or equivalent) to ensure they are dealt with promptly and in accordance with Bravus Australia's safety management systems and procedures.

Use of the SHMS (or equivalent) is not a prerequisite to making a protected disclosure under this Standard, but is the preferred method for minor safety issues arising from day-to-day operations or isolated safety incidents.

If you raise concerns through the SHMS (or equivalent) and feel the concerns have not been appropriately addressed, or where you have a genuine concern about reprisal or adverse consequences arising from reporting, you can escalate those concerns in accordance with this Standard.

4.2 Matters That Do Not Qualify as Reportable Matters

Personal work related grievances of current or former employees are not covered under this Standard, and should be reported to your line manager or human resources representative. Disclosures about these matters may be protected under other legislation.

A personal work related grievance means a grievance about any matter in relation to the discloser's employment, or former employment, having (or tending to have) implications for the discloser personally. This includes:

- an interpersonal conflict between the discloser and another employee;
- a decision relating to the engagement, transfer or promotion of the discloser;
- a decision relating to the terms and conditions of engagement of the discloser; and
- a decision to suspend or terminate the engagement of the discloser, or otherwise to discipline the discloser.

However, it does not include:

- any conduct that would be considered victimisation of an individual because they have made, may have made, or propose to make a report under this Standard; or
- a matter that would have significant implications for Bravus Australia. These matters will be reportable matters.

5 Making a report to an eligible recipient

There is no requirement for disclosures to be made in a particular form. Disclosures may be made in writing (e.g. via email), in person or via telephone.

5.1 External Reporting to the Whistleblowing Hotline

Employees, officers and individual contractors may make a report to Bravus Australia's external whistleblowing hotline. Reports may be made by telephone, email, anonymous web page reporting system, post or facsimile. Contact details are below and available on the Company's internal and external internet pages.

Telephone:	1800 512 383
Email:	bravuswbhotline@pkf.com.au
Online:	https://talkintegrity.com/?brv

5.2 Report to a Whistleblower Protection Officer

Any discloser may make a report directly to a Whistleblower Protection Officer (WPO). There are currently two WPOs for Bravus Australia, being:

- the Primary WPO, Head of Human Resources; and
- the Secondary WPO, Company Secretary.

When reporting to a WPO, the discloser should inform the WPO that they wish to make a report under this Standard, so that the WPO can make appropriate arrangements in relation to confidentiality.

5.3 Report to an Eligible Recipient

If a discloser is unable to use any of the above channels for reporting, a report can be made to an eligible recipient within Bravus Australia. eligible recipients in relation to Bravus Australia are:

- officers, directors and senior managers; and
- internal or external auditors, or a member of an audit team conducting an audit.

When reporting to an eligible recipient, the discloser should inform the WPO that they wish to make a report under this Standard, so that the WPO can make appropriate arrangements in relation to confidentiality.

An eligible recipient may direct the discloser to make the report to a WPO, if they consider it appropriate in the circumstances.

5.4 Reports about tax matters

If the discloser is making a report about the tax affairs of Bravus Australia, they may also make a report to a registered tax agent or Business Activity Statement (BAS) agent who provides tax agent services or BAS services to Bravus Australia.

5.5 Report to an External Body

Bravus Australia encourages employees and other disclosers to make a report to Bravus Australia in the first instance, so that it can identify and address wrongdoing as early as possible. However, the discloser may make a report about a reportable matter to one of the following external parties:

- the Australian Securities and Investments Commission (ASIC), the Australian Prudential Regulation Authority (APRA) or a prescribed Commonwealth authority. ASIC and APRA have issued information sheets or guides on whistleblowers' rights and protections, available on their websites;
- a legal practitioner in order to obtain legal advice or legal representation in relation to the whistleblower regime;
- in limited circumstances, a journalist or Member of Parliament. There is strict criteria under the Corporations Act about when a disclosure to a journalist or Member of Parliament qualifies the discloser for protection as a whistleblower. We recommend that you contact an independent legal adviser if you wish to obtain further information regarding the strict criteria for making a protected disclosure to a journalist or Member of Parliament; or
- if the reportable matter relates to taxation, in certain circumstances, the Commissioner of Taxation. The ATO has issued a guide on tax whistleblowing, available on their website.

6 Information to include in the Report

A report may be made anonymously and a discloser may choose to remain anonymous during and after any investigation into the disclosure. For example, if Bravus Australia receives a disclosure from an email address

from which the sender's identity cannot be determined and the discloser does not identify themselves in the email, it will be treated as an anonymous disclosure.

If you choose to make an anonymous disclosure, we recommend that you maintain ongoing two-way communication so that Bravus Australia can ask any follow up questions.

We also want you to feel comfortable raising your concern openly. This enables Bravus Australia to monitor and check in on your wellbeing and ensure your safety and protection in the workplace. Please see section 8 for further information about how disclosures will be treated.

When reporting a disclosure, you should provide as much information as possible, in any form, about the reportable matter.

By way of example, information could include (but must not necessarily include):

- the date, time and location;
- the name(s) of person(s) involved and possible witnesses to the events;
- evidence of the events (e.g. documents, emails etc); and
- steps the discloser or another person may have already taken to report the matter or to resolve the concern.

7 How Reports Will Be Dealt With

7.1 Assessment of the Report

Bravus Australia's WPO will conduct an initial assessment of a report made under this Standard to assess whether it concerns a reportable matter, whether a formal, in-depth investigation is required, and whether the matter may be investigated or confirmed in other ways. An investigation may not be possible if the discloser cannot be contacted or further details cannot be obtained (for example, if a report is made anonymously and no contact details are provided).

7.2 Appointment of an Investigator

The WPO may appoint an investigator to investigate the matter. The investigator can be:

- an employee of a Bravus Australia Company with the required skills and experience;
- an external investigator; or
- another suitably qualified person,

who, in whichever case, is not implicated directly or indirectly in the report.

7.3 Conduct of an Investigation

If the WPO determines it appropriate to investigate a disclosure made under this Standard, it will be investigated as soon as possible after the matter has been reported. The investigator will use his or her best endeavours to conduct the investigation in a timely, thorough, confidential, objective and fair manner and as is reasonable and appropriate having regard to the nature of the reportable matter and all of the circumstances.

- Where appropriate, the subject(s) of the report will be informed of the allegations and be given an opportunity to respond.

- Where appropriate, the WPO will update the discloser on the progress of the investigation. A discloser must not disclose and must keep confidential any details of the investigation, its progress or its outcome.
- Where appropriate, and where the identity of the discloser is known, the WPO will inform the discloser of the outcome of an investigation into a report made by the discloser in accordance with this Standard.

7.4 Investigation outcomes

The outcome of an investigation may result in disciplinary action for officers and employees up to and including termination of employment. Serious criminal matters will be reported to the police or the appropriate regulatory authorities.

8 Protections for Disclosers

8.1 Confidentiality regarding your identity

The whistleblower regime sets strict confidentiality obligations regarding your identity information if you make a disclosure. Bravus Australia will treat your identity and your disclosure with strict confidentiality.

It is unlawful for Bravus Australia to disclose the identity or information that may lead to the identification of a whistleblower (confidential identity information) unless Bravus Australia is authorised to do.

There are limited circumstances in which Bravus Australia is authorised to disclose confidential identity information, including:

- if the disclosure is made with the whistleblower's consent;
- if the disclosure is made to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the whistleblower regime; or
- the disclosure is made to ASIC, APRA, a member of the Australian Federal Police or another body prescribed by the regulations.

If you do disclose your identity when making a protected disclosure, the person who received your disclosure will treat your identity confidentially in accordance with the above confidentiality protections. This includes securely storing documents regarding your protected disclosure, and limiting access to information relating to the protected disclosure to those directly involved in managing and investigating the disclosure.

In some circumstances, it may be necessary for Bravus Australia to request your consent to disclose your identity in order to effectively progress with dealing with your protected disclosure. You are under no obligation to provide your consent, but you are encouraged to do so as it will enable a fulsome investigation of a protected disclosure and take appropriate action.

If you do not consent to the disclosure of your identity, the matter may nevertheless be referred for investigation, but the investigator will be required to take all reasonable steps to reduce the risk of you being identified as a result of the investigation.

Please be aware that, in practice, people may be able to deduce your identity if you have previously mentioned that you are considering making a protected disclosure, or if only a very small number of people has access to the information you are disclosing.

8.2 Prohibition on taking detrimental action

Bravus Australia will not tolerate any reprisals or threats of reprisals made against whistleblowers and will take appropriate steps to protect whistleblowers from such retaliation.

It is a breach of this Standard to subject a discloser to any detriment because they have made, or propose to make, a report under this Standard. It is also a breach of this Standard to make a threat to cause detriment to a discloser (or another person) in relation to a report.

"Detriment" includes (without limitation):

- dismissal;
- injury of an employee in his or her employment;
- alteration of an employee's position or duties to his or her disadvantage;
- discrimination between an employee and other employees of the same employer;
- harassment or intimidation;
- harm or injury (including psychological harm);
- damage to a person's property; and
- reputational, financial or any other damage to a person.

Detriment does not include administrative action that is reasonable to protect a discloser from detriment (for example a temporary transfer), or reasonable management action in relation to managing an employee's work performance, if the action is in line with the relevant Bravus Australia Company's performance management framework.

If a discloser believes they have suffered or may suffer detriment because they have made a report under this Standard, or if any person has threatened to cause detriment to them or another person in connection with a report, they should immediately report the matter to a WPO.

8.3 Protection from legal action

The discloser cannot be subject to civil, criminal or administrative liability for making a report under this Standard (although, he or she may be subject to civil, criminal or administrative liability for their personal misconduct that is revealed in a disclosure).

A discloser that suffers loss, damage or injury because of a protected disclosure may seek compensation and other remedies through the courts. A discloser should seek independent legal advice if they wish to obtain such a remedy. A discloser may also contact regulatory bodies such as ASIC or APRA if they believe that they have suffered detriment due to making a report about a reportable matter, or if there has been a breach of confidentiality such as a disclosure of their identity without their consent.

9 What If I Make A Disclosure That Does Not Qualify Under This Standard?

If you make a report which does not qualify as a protected disclosure under this Standard or at law, you will not qualify for the legal protections set out above.

Bravus Australia takes all reports seriously, even if they do not qualify, and will consider your report and take action to deal with it where it is appropriate to do so.

10 Support for Disclosers

Bravus Australia recognises that making a disclosure may be difficult for disclosers.

Support available for disclosers includes:

- connecting the discloser with access to the Employee Assistance Program (EAP);
- appointing an independent support person from the human resources team to deal with any ongoing concerns they may have; and
- connecting the discloser with third party support providers such as Lifeline (13 11 14) and Beyond Blue (1300 22 4636).

Use of these support services by a discloser may require the discloser to consent to disclosure of their identity or information that is likely to lead to the discovery of their identity.

11 Fair treatment of persons implicated

Any reports that implicate an employee or officer of Bravus Australia must be kept confidential, even if the discloser has consented to the disclosure of their identity, and should only be disclosed to those persons who have a need to know the information for the proper performance of their functions under this Standard, or for the proper investigation of the report.

No action will be taken against employees or officers who are implicated in a report under this Standard until an investigation has determined whether any allegations against them are substantiated. However, an employee or officer who is implicated may be temporarily stood down on full pay whilst an investigation is in process, or may be temporarily transferred to another office, department or workplace, if appropriate in the circumstances. Any such stand-down or temporary transfer may only continue for the duration of the investigation and must cease if the allegations are not substantiated.

An employee or officer who is implicated in a disclosure has a right to be informed of the allegations against them, and must be given an opportunity to respond to those allegations and provide additional information, if relevant, in the course of an investigation into those allegations. An employee or officer who is implicated in a report will be informed of the outcome of any investigation.

Support available for persons implicated in a report under this Standard includes:

- connecting the person with access to the Employee Assistance Program (EAP);
- appointing an independent support person from the human resources team to deal with any ongoing concerns they may have; and
- connecting the person with third party support providers such as Lifeline (13 11 14) and Beyond Blue (1300 22 4636).

12 Reviewing and monitoring

The Primary WPO will report to the Board of Bravus Australia on a periodic basis regarding the effectiveness of this Standard, and the Bravus Australia's whistleblowing processes. All such reports shall be de-identified and shall ensure confidentiality of disclosers.

If a report under this Standard relates to serious misconduct or involve a serious risk to Bravus Australia, a WPO may immediately notify the Board.

Bravus Australia shall review this Standard, and its whistleblowing processes, on a periodic basis to ensure that it is operating effectively, and to rectify issues identified in the review.