

Whistleblower Policy

Policy

SFM is committed to the highest standards of conduct and ethical behaviour in all of our business activities, and to promoting and supporting a culture of honest and ethical behaviour.

SFM encourages the reporting of any instance of Potential Misconduct and will ensure that individuals who disclose Potential Misconduct can do so safely, securely and with confidence that they will be protected and supported.

This policy applies to all current and former directors, employees, contractors, suppliers, customers or any other persons who has dealing with SFM including a relative, spouse or dependant of any of the above.

Procedural Principles

- **“Potential Misconduct”** means any suspected or actual misconduct or improper state of affairs or circumstances in relation to SFM. It also means (but is not limited to) a breach of law or information that indicates a danger to the public, and includes but is not limited to:
 - failure to comply with, or breach of legal or regulatory requirements;
 - material breach of SFMs policies and procedures;
 - engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure, or is believed or suspected to have made, or be planning to make a disclosure of Potential Misconduct;
 - criminal activity;
 - bribery or corruption;
 - conduct endangering health and safety or causing damage to the any person or the environment;
 - dishonest, unethical or irresponsible behaviour;
 - conflicts of interest, including those relating to outside business interests, relationships, improper payments and donations;
 - victimisation or harassment;
 - modern slavery [[POLICY - SFM FSC Core Labour Requirements](#)]; and
 - concerns that pose a danger to the public or financial system (even if it does not involve a breach of law); and deliberate concealment of any of the above.
- Disclosures that relate solely to personal work-related grievances, and do not relate to detriment or threat of detriment to the person speaking up, are not covered by this Policy. Personal work-related grievances are those that relate to your current or former employment and only have implications for you personally.
- You may make a report under this policy if you have reasonable grounds to suspect Potential Misconduct. You will be expected to have reasonable grounds to suspect the information you are disclosing is true and accurate from first-hand knowledge, but you will not be penalised if the information turns out to be incorrect. However, you must not make a report that you know is untrue or misleading. Deliberate false reporting will not be covered by this Policy and will not be a protected disclosure. Where it is found that the person has knowingly made a false report, this may result in disciplinary action.


- Under this policy, reports can be made to:

Name	Position	Contact Details
Andrew Morgan	Managing Director	Ph: 0413 589 259 E: amorgan@sfmes.com.au
David Wise	Executive Director	Ph: 0408 127 725 E: dwise@sfmes.com.au

- Reports can also be made by creation of an Issue (Whistleblower) using the SafetyCulture platform (via QR Code or SFM login). Reports made using Safety Culture will be directed to the Sustainability and Compliance Manager and will be accessible by the platform administrator.
- You will not be penalised or subject to any detriment for making a report under this policy. It is unlawful to cause detriment to you or another person on the belief or suspicion that a report has been, or will be, made, regardless of whether the report was made.
- All efforts will be made by SFM to protect the identity of a person who has made a report and their identity. Your identity (and any information SFM has because of your report that someone could likely use to work out your identity) will only be disclosed if you give your consent to SFM to disclose that information or in exceptional circumstances where the disclosure is allowed or required by law.
- All information, documents, records and reports relating to the investigation of a Potential Misconduct will be confidentially stored and retained in an appropriate and secure manner. Access to all information relating to the disclosure will be limited to those directly involved in managing and investigating the disclosure. Only a restricted number of people who are directly involved in handling and investigating the disclosure will be made aware of your identity (subject to your consent) or information that is likely to lead to the identification of your identity.
- SFM will investigate all matters reported under this policy as soon as practical after the matter has been reported. The investigation will be conducted in an objective and fair manner. Investigation processes will be determined by the nature and substance of the report.

Revision and Approval

This document will be updated whenever significant changes occur.

Version	Changes	Date
V1	Original	10/08/2020
V2	Review and Update	26/08/2021
V3	Update – Position Title	30/06/2022
V4	Reviewed	30/06/2023
V5	Substantial Review	20/06/2024
Approval signature:	 Managing Director - SFM	