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Responsible person	CEO
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ASSET MANAGEMENT COUNCIL

Whistleblower Policy

PURPOSE

This policy sets out how Asset Management Council Limited (AM Council) will support and protect individuals who disclose suspected misconduct or breaches of law.

It demonstrates AM Council's commitment to integrity, transparency, and accountability and compliance with Part 9.4AAA of the Corporations Act 2001 (Cth).

SCOPE

This policy applies to whistleblowers defined as AM Council's current and former:

- a) Members
- b) Directors, officers, employees, volunteers, and contractors.
- c) Suppliers and their employees.
- d) Relatives, dependants, and spouses of the above.

POLICY

1. Reportable Conduct

A disclosure qualifies for protection under this policy if it relates to past, present, or likely future Reportable Conduct including, but not limited to:

1.1 Breaches of Law and Regulation

- a) Conduct that breaches the Corporations Act 2001 (Cth) or other Commonwealth laws punishable by imprisonment of 12 months or more.
- b) Fraud, theft, bribery, corruption, or money laundering.
- c) Insider trading or market manipulation.
- d) Breaches of privacy, data protection, confidentiality or workplace safety laws.

1.2 Misconduct or Improper State of Affairs

- a) Dishonest, unethical, or improper conduct by directors, officers, employees, contractors, suppliers, or members.
- b) Serious conflicts of interest not disclosed or managed appropriately.
- c) Misuse of AM Council's funds, assets, or resources.
- d) Systemic breaches of AM Council's Code of Conduct, Constitution, or By-laws.

1.3 Governance and Compliance Failures

- a) Concealment or deliberate misstatement in financial reporting.
- b) Failure to comply with statutory obligations (e.g ASIC, ATO reporting).
- c) Retaliation against whistleblowers or attempts to obstruct investigations.

1.4 Other Serious Misconduct

- a) Bullying, harassment, or discrimination where it indicates systemic or cultural issues.
- b) Any conduct that undermines AM Council's integrity, reputation, or ability to achieve its objectives.
- c) Conduct that poses a serious risk to the public, the financial system, the environment, or the community.

1.5 Exclusions

Personal work-related grievances (e.g. interpersonal disputes, performance management issues) are generally not Reportable Conduct unless they involve:

- a) Victimisation of a whistleblower.
- b) Breaches of law (e.g. discrimination, harassment).
- c) Systemic misconduct or risks to AM Council's governance.

These are addressed in line with the Grievance and Dispute Resolution Policy

2. Reporting Channels

Disclosures can be made in line with Whistleblowers procedure to:

- a) **Whistleblower Protection Officer (WPO):** National Chair
- b) **Company Secretary:** CEO
- c) **External auditor** or ASIC if appropriate.

Reports may be made in writing, verbally, or anonymously.

3. Protections

The AM Council will provide the following protections for whistleblowers:

- **Confidentiality:** The identity of the whistleblower will not be disclosed without consent, except as permitted by law.
- **Protection from detriment:** It is unlawful to victimise or threaten a whistleblower.
- **Compensation:** Whistleblowers may seek remedies if they suffer detriment.
- **Immunity:** Whistleblowers are protected from civil, criminal, or administrative liability for making a disclosure.

Whistleblowers are protected even if their disclosure is incorrect, provided it was made in good faith and with objectively reasonable grounds.

4. Investigation

The AM Council will investigate all disclosures in line with the following principles and as outlined in the Whistleblowers Procedure

All disclosures will be investigated in accordance with natural justice including fairness, impartiality and a clear opportunity to respond to any allegations.

- a) Investigations will occur promptly.
- b) Findings will be reported to the Board with strict confidentiality and without revealing the whistleblower's identity unless consent is given.
- c) Outcomes will be communicated to the whistleblower where possible, subject to confidentiality.

5. Roles & Responsibilities

- a) **Board:** Oversees policy implementation and ensures compliance.
- b) **Whistleblower Protection Officer:** Primary contact for disclosures, ensures protections are applied.
- c) **Management:** Must support whistleblowers and cooperate with investigations.

- d) **Members, Staff & Volunteers:** Must respect confidentiality and avoid victimisation.

8. Related Documents

- a) Whistleblower procedure
- b) Code of conduct
- c) Privacy Policy

AUTHORISATION

Approved by Board

[22 Jun 2026]