

## Purpose

The purpose of this policy is to describe the process for making any disclosure of an allegation of any Reportable Conduct (defined below) and Whistleblower protections.

Lifeblood is committed to providing a 'safe to say' culture where people feel safe and are encouraged to speak up on matters which concern them.

Lifeblood has compiled this policy with reference to the Australian Standard AS8004-2003 *Whistleblower Protection Programs for entities* (the Standard) and the *Corporations Act 2001* (Cth) (the Corporations Act).

This policy is available on Lifeblood's intranet and website.

## Audience

This policy applies to all employees, officers, contractors and volunteers of Lifeblood.

## Entitlement to disclose Reportable Conduct

Lifeblood is committed to complying with applicable laws and the Standard.

All employees (present and past), contractors or volunteers of Lifeblood are encouraged and entitled to disclose Reportable Conduct in accordance with the mechanisms available in this Policy and to receive feedback on such disclosures.

"Reportable Conduct" is conduct by any Lifeblood employee, officer, contractor or volunteer which the Whistleblower suspects on reasonable grounds is:

- Honest;
- Fraudulent;
- Corrupt Conduct;
- Illegal;
- In breach of Commonwealth or state legislation (including local authority laws)
- Unethical;
- Improper Conduct;
- An unsafe practice; or
- any other conduct which may cause financial or non-financial loss to Lifeblood or be otherwise detrimental to the interests of Lifeblood.

Allegations of Reportable Conduct will be investigated fairly, following procedural fairness, by an investigator who may be a person from within Lifeblood or a consultant engaged for that purpose. Lifeblood will seek to action any finding of wrongdoing in an appropriate manner.

This policy is not intended to apply to vexatious, malicious or knowingly false disclosures, personal grievances between people or to Lifeblood decisions that have been made validly and that do not involve Reportable Conduct.

Personal work-related grievances, such as allegations of bullying or harassment, should be referred directly to a People and Culture consultant as this policy does not apply to those matters and do not qualify for the protections under the Corporations Act.

Nothing in this policy or any associated procedure is intended to limit Lifeblood's obligations, or the protections afforded to any person, under any statutory whistleblower regime.

## How to make a disclosure

The following ways are available to make a disclosure or report, which can be made on an anonymous basis.

Contact options	Who to contact
Protected Disclosure Officer	<p>Lifeblood appoints and maintains appropriate qualified Protected Disclosure Officers, who are accessible to all staff.</p> <p>The Protected Disclosure Officers are:</p> <ul style="list-style-type: none"> <li>• General Counsel</li> <li>• Chief Financial Officer</li> <li>• Executive Director, People and Culture</li> <li>• other persons appointed by the Chief Executive and notified to staff from time to time</li> </ul>
Whistleblower Report portal  (A dedicated 24/7 reporting hotline run by an external provider)	<p>Ph: 1300 304 550</p> <p>Email: <a href="mailto:redcrossblood@stopline.com.au">redcrossblood@stopline.com.au</a></p> <p>Web: <a href="http://redcrossblood.stoplinereport.com">http://redcrossblood.stoplinereport.com</a></p> <p>Depending on the nature of a report, the provider of the ethics and compliance hotline will report details to the General Counsel and if applicable the Chief Executive, Executive Director of People and Culture and/or Chief Financial Officer.</p>
Regional contacts	<ul style="list-style-type: none"> <li>• Executive Directors</li> <li>• Manufacturing Managers</li> <li>• Donor Services Managers</li> <li>• People &amp; Culture Business Partners</li> </ul> <p>Depending upon the nature of a report, the Regional contacts will report details to the General Counsel, Executive Director People and Culture and/or Chief Financial Officer</p>
External contacts	<p>If consider you are not comfortable or it is not safe to report the conduct to one of the above listed contacts then the conduct can be reported to the following:</p> <ul style="list-style-type: none"> <li>• Legal practitioners;</li> <li>• regulatory bodies and other external parties; and</li> <li>• under certain limited circumstances prescribed in the regulations, journalists and members of Commonwealth, state or territory parliaments (parliamentarians). (Note that the Whistleblower protections do not apply if the disclosure to the public is made in another way).</li> </ul>

Prior to making a disclosure, a Whistleblower can contact the General Counsel to seek further information.

## Whistleblower Protections

Lifeblood is committed to protecting people who make disclosures of Reportable Conduct.

Whistleblowers are entitled to not be personally disadvantaged by any of the following as a result of making a genuine disclosure of Reportable Conduct:

- dismissal
- injury in employment
- demotion or alteration of the Whistleblower's position to the disadvantage of the Whistleblower
- any form of harassment or intimidation
- harm or injury
- damage to property, reputation or financial position
- discrimination
- current or future bias

Whistleblowers may request action to be taken by Lifeblood to protect them and one or more of the Protective Disclosure Officers. Lifeblood will assess such requests.

Protected Disclosure Officers may appoint a Lifeblood employee or external person engaged by Lifeblood as a welfare officer for the Whistleblower.

Victimisation of a Whistleblower is prohibited by the Corporations Act and includes causing or threatening to cause detriment to another person. Whistleblowers receive the following protections when Protected Disclosures are made;

- identity protection;
- protection from detrimental acts or omissions;
- compensation and remedies; and
- civil, criminal and administrative liability protection.

If a Whistleblower claims reprisals are taken against them as a result of making a disclosure of Reportable Conduct, the Whistleblower will have a right of appeal to the Chief Executive Officer of Lifeblood.

If the matter cannot be resolved internally, the Protected Disclosure Officer can appoint an independent mediator or arbitrator to resolve the matter.

## Confidentiality

Information received as part of any disclosure of Reportable Conduct is protected by confidentiality.

Whistleblower reports can be made anonymously to the Whistleblower Report portal.

If a Whistleblower makes a report to a Protected Disclosure Officer or Regional Contact, the Whistleblower can request that their identity remain anonymous.

If the Whistleblower consents, their identity will be available only to persons required to be involved in the investigation and resolution of the matter.

Information regarding the disclosure itself will be available only on an "as needs" basis to a restricted number of people who are directly involved in handling and investigating a disclosure.

All paper and electronic documents and other materials relating to disclosures will be stored securely.

## False Reports

Vexatious, malicious or knowingly false disclosure of Reportable Conduct against one or more other persons will not be tolerated and Whistleblower protections will not apply to any such disclosures.

Disciplinary action may be taken against individuals who make vexatious, malicious or knowingly false disclosures, up to and including termination of employment.

## Handling Protected Disclosures

Refer to *Handling Disclosures* (SOP-00987).

## Policy Review

This policy and related procedures are reviewed periodically for effectiveness. Statistics about reported concerns are reported to Lifeblood Board and Lifeblood Executive bi-annually (if applicable).

**Definitions**

Term/abbreviation	Definition
Corrupt Conduct	Dishonest activity in which an employee, officer, contractor or volunteer of Lifeblood acts contrary to the interest of Lifeblood and/or abuses his or her position of trust in order to achieve personal gain or advantage for him or herself, or for another person or entity.
Improper Conduct	Conduct that is Corrupt or is a substantial misuse or abuse of Lifeblood's resources, or involves substantial risk to public health or safety, or to the environment. The improper conduct must be sufficiently serious to establish, if proved, a criminal offence or reasonable grounds for dismissal from employment (in relation to an employee).
Reportable Conduct	As defined on page 1.
Whistleblower	Lifeblood employee (present or past), officer, contractor, volunteer or a relative or dependent of an employee, officer, contractor or volunteer, who makes, attempts to make or wishes to disclose Reportable Conduct and who may seek to avail themselves of protection against reprisal for having made the report.

**Referenced external documents**

Document title	Source
'Whistleblower Protection Programs for entities', AS8004-2003 Corporations Act 2001 (Cth)	Australian Standards

**Referenced internal documents**

Document number	Document title
SOP-00987	Handling disclosures

**Change history**

Version number	Effective date	Reference	Summary of change
001-003	N/A	N/A	Refer to National Document Control.
1	12/04/2016	N/A	Migrated document. No content change.
2	30/11/2016	N/A	Two year review. Minor clerical changes. Transfer to current template.
3	05/04/2018	N/A	Added updated contact details for Ethics and Compliance hotline. Reviewed language for readability. Handling disclosures information removed to create <i>Handling disclosures</i> (SOP-00987).
4	Refer to footer	N/A	Updated to Lifeblood template and updated for legislative requirements

**Electronic signature**

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