

WHISTLEBLOWER POLICY

1. Purpose

This policy sets out how **A1 Property Services Pty Ltd T/A Gleam Team Domestic Services** complies with the **Corporations Act 2001 (Cth)** (as amended), the **Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019**, the **Aged Care Act 1997** and the **Aged Care Amendment (Implementing the Recommendations of the Royal Commission into Aged Care Quality and Safety) Act 2023**, as well as any relevant standards and guidelines for CHSP providers in 2025.

This policy aims to:

- Encourage staff, volunteers, contractors, clients, and stakeholders to report concerns about unethical, illegal, fraudulent, or undesirable conduct.
- Ensure that anyone making a disclosure can do so safely, securely, and confidentially.
- Provide protections and support for whistleblowers.
- Ensure that all reports are handled appropriately and in line with applicable legislation.

2. Scope

This policy applies to:

- Employees (permanent, temporary, casual, and former)
- Volunteers
- Contractors and suppliers
- Clients and their representatives
- Any other person who has a relationship with the organisation

3. What Conduct Can Be Reported?

Disclosable matters may include:

- Dishonest, fraudulent, corrupt, or illegal activity
- Unethical behaviour, including breaches of the Code of Conduct
- Misuse of funding under the CHSP or other government funding

- Unlawful abuse, neglect, or exploitation of clients
- Any conduct that endangers the health or safety of others
- Deliberate cover-ups of any of the above

Personal work-related grievances that do not have significant implications for the organisation generally are not protected under whistleblower laws but may be managed under our Grievance Policy.

4. How to Make a Report

You can report a concern through any of the following channels:

- **Whistleblower Protection Officer (WPO):** Sallie Feeney – via sallie@gleamteam.com.au or on 08 8352 5885
- **Managing Director:** Marilyn Kennedy via Marilyn@anzint.com.au or on 08 8352 5885
- **External Reporting:** Reports can also be made directly to the **Australian Securities & Investments Commission (ASIC)**, the **Australian Prudential Regulation Authority (APRA)**, or the **Aged Care Quality and Safety Commission**, as appropriate.

Reports can be made anonymously, and we will respect your choice to remain unidentified.

5. Confidentiality

All reports will be handled confidentially and in accordance with the law. Your identity will only be disclosed with your consent or if required by law.

6. Protection for Whistleblowers

A1 Property Services Pty Ltd prohibits any form of detrimental conduct against whistleblowers. This includes:

- Dismissal or demotion
- Discrimination or harassment
- Threats or victimisation
- Any other form of retaliation

Anyone found to be engaging in detrimental conduct may be subject to disciplinary action, up to and including termination.

7. Investigation

All disclosures will be assessed promptly and fairly. Investigations will:

- Be conducted in a fair, impartial, and timely manner
- Ensure procedural fairness for all parties
- Maintain confidentiality to the greatest extent possible

Outcomes will be communicated to the whistleblower where appropriate and feasible.

8. Support Available

Whistleblowers will be provided with reasonable support, which may include:

- Adjustments to work arrangements if required
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9. Responsibilities

- **Directors/Management:** Ensure compliance with the policy and relevant legislation.
 - **Whistleblower Protection Officer:** Act as the first point of contact and oversee the handling of disclosures.
 - **All Personnel:** Act honestly and ethically and report any suspected wrongdoing.
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10. Review

This policy will be reviewed at least annually to ensure it remains compliant with legislation and best practice standards for CHSP providers.