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WHISTLEBLOWER PROTECTION POLICY

VERSION 3.0 · 14 APRIL 2026 · 3CIR-POL-GEN-008

DOCUMENT CONTROL

This Whistleblower Protection Policy is a controlled document within 3CIR's Integrated Management System. It is governed by the listed standards and forms part of the organisation's quality, environmental, and occupational health & safety framework.

DOCUMENT NUMBER	3CIR-POL-GEN-008
DOCUMENT TITLE	Whistleblower Protection Policy
VERSION	3.0
ISSUE DATE	14 April 2026
REVIEW DATE	14 April 2027
APPROVED BY	CEO / COO
CLASSIFICATION	Controlled Document

APPLICABLE STANDARDS

ISO 9001:2015 | ISO 14001:2015 | ISO 45001:2018

PURPOSE

01

3CIR Pty Ltd encourages a culture of openness, integrity, and accountability. This policy establishes the protections available to employees, contractors, and others who report genuine concerns about misconduct, illegal activity, safety issues, or ethical breaches — commonly referred to as 'whistleblowing' or 'making a protected disclosure'. 3CIR is committed to ensuring that anyone who raises a concern in good faith is protected from detrimental action, threats, or reprisals of any kind.

LEGISLATIVE FRAMEWORK

02

- Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 (Cth) — strengthens protections for corporate whistleblowers
- Corporations Act 2001 (Cth) — Part 9.4AAA (whistleblower protections)
- Public Interest Disclosure Act 2010 (Qld) — protections for public interest disclosures
- Fair Work Act 2009 (Cth) — general protections from adverse action
- Work Health and Safety Act 2011 (Qld) — protections for workers raising safety concerns

WHO IS PROTECTED

03

The following categories of people may make a protected disclosure under this policy:

- Current and former employees and contractors
- Current and former officers and directors
- Suppliers and their employees
- Relatives, dependants, and spouses of the above
- Any other person with information about wrongdoing involving 3CIR

WHAT CAN BE REPORTED

04

A concern may relate to (but is not limited to):

- Fraud, financial crime, theft, or misuse of 3CIR funds
- Bribery, corruption, or facilitation of unlawful payments
- Serious breaches of Australian law or regulations
- Serious WHS breaches that create a risk to life or health
- Misconduct, dishonesty, or gross mismanagement
- Serious breaches of 3CIR's policies (including this policy)
- Environmental harm or regulatory breaches
- Modern slavery or serious human rights violations
- Cover-ups of any of the above

HOW TO MAKE A DISCLOSURE

05

Disclosures may be made to any of the following: Route Contact

PROTECTIONS PROVIDED

06

A person who makes a protected disclosure under this policy and applicable legislation is entitled to the following protections:

- Confidentiality — the identity of the whistleblower will not be disclosed without consent, except where required by law or where the disclosure is made to a regulator
- Protection from reprisal — no person will be dismissed, demoted, harassed, discriminated against, or subjected to any other detrimental action because they have made or intend to make a protected disclosure
- Legal immunity — a whistleblower does not incur civil or criminal liability for making a protected disclosure in good faith, and may not be pursued in contract or otherwise
- Legal costs — if a whistleblower faces legal proceedings arising from a disclosure, 3CIR will consider providing reasonable legal support, subject to circumstances

FALSE AND MALICIOUS REPORTS

07

This policy does not protect disclosures made maliciously, dishonestly, or with intent to harm another person. Knowingly making a false report is a serious breach of the Code of Conduct (3CIR-POL-GEN-005) and will be addressed under the Enforcement Policy (3CIR-POL- HR-004).

INVESTIGATION PROCESS

08

All disclosures will be: acknowledged within 2 business days; assessed for genuineness and initial risk within 5 business days; investigated promptly and with appropriate confidentiality; and reported to the discloser (where identity is known) upon conclusion. Investigations will be conducted by a person not directly involved in the reported conduct. Where the report involves the COO, the CEO will manage the investigation, and vice versa.

REVIEW

09

This policy is reviewed annually by the CEO and COO, or sooner if triggered by legislative change, a disclosure, or audit recommendation.

AUTHORISATION & APPROVAL

This policy (3CIR-POL-GEN-008) is authorised and approved for release in accordance with 3CIR's Integrated Management System governance framework.

AUTHORISED BY

Marcella Knottenbeld

Chief Executive Officer

Signature Date: / / 2026

AUTHORISED BY

Matthew Pitt

Chief Operating Officer & Director

Signature Date: / / 2026

DOCUMENT CONTROL NOTICE

This is a controlled document. Printed copies are uncontrolled. Check the Document Control Register (3CIR-REG-IMS-001) to verify currency. Note: Signature block updated 22 April 2026 to reflect the current governance structure per 3CIR-REC-IMS-018 Governance Structure Formalisation Record v1.0. Document content and original effective date remain unchanged. This update is an authorised configuration correction, not a material revision of the document.

VERSION HISTORY NOTE

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