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RESPONSIBLE DEPARTMENT:	Company Secretary
CATEGORY:	Governance
DATE APPROVED:	1 September 2008
DATE OF NEXT REVIEW:	3 years
RELATED POLICIES AND DOCUMENTS:	Corporations Act 2001

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## Introduction

The Corporations Act protects certain whistleblower activities, and protects whistleblowers from persecution. These protections are designed to encourage people within the Company or with special connections to the Company to alert ASIC and other authorities to illegal behaviour.

## Definitions

Whistleblower –

- Someone who alerts the authorities to misconduct from within the organisation.

Disclosure –

- Breach of the Corporations Act or ASIC Act.

## Policy

We recognise our responsibilities and have established this policy and associated procedures to ensure compliance with the Corporations Act by all employees of Programmed.

We seek to provide all employees with a working environment free of improper or corrupt conduct and we value the appropriate use of mechanisms to disclose and eliminate corrupt or improper conduct.

We seek to protect against detrimental action in reprisal for a protected disclosure.

All members of PROGRAMMED are bound by this policy, including employees of Programmed.

## Access and equity

We are committed to adhering to access and equity principles in the implementation of the policy.

## Who is protected

To be protected by the Corporations Act as a whistleblower, you must be:

- An officer (usually that means a director or secretary) of the Company about which you want to report;
- An employee of the Company; or
- A contractor, or the employee of a contractor, who has a current contract to supply goods or services to the Company.

You must identify yourself. Anonymous reports are not protected under the Corporations Act.

## Where a disclosure is made

Disclosures can be made to:

- ASIC;
- The Company's auditor or a member of an audit team conducting an audit of the Company;
- A director, Company Secretary, or CEO; or
- A person authorised by the Company to receive disclosures of that kind