

SPEAK UP

POLICY

Purpose and application of policy

Global Engineering & Construction (GEC) are committed to providing a safe workplace with a culture that encourages everyone to speak up and report any suspected or actual wrongdoings in accordance with our procedures.

The policy outlines the avenues available to speak up, encourages the reporting of a suspected or actual wrongdoing with GEC or by those affiliated with and the protections available for those who do speak up.

Disclosable matters

A Whistleblower may make a report if they have reasonable grounds to suspect the wrongdoing as occurred. Wrongdoings may include:

- conduct or practices which are illegal
- A breach of regulations or laws.
- Endangering the health and safety of a person.
- Dishonest, fraudulent, or corrupt behaviour.
- Constitutes as misconduct or an improper state of affairs in relation to GEC.
- Illegal activity.
- Impeding internal or external audit processes.
- Improper behaviour relating to accounting, internal accounting controls, actuarial or audit matters.
- Concealing a reportable wrongdoing.
- A substantial mismanagement of GEC resources.

Reports raised about personal or work-related grievances which are not disclosable matters will not be managed in accordance with the protections available under the Corporations Act.

Definition of a Whistleblower

GEC define a Whistleblower as the current and former of; team members (including casual, full/part time and fixed term), contractors, suppliers or consultants engaged to perform work for GEC, the Board, and any spouse, dependent or relative of those outlined above.

Who do I make a report to?

Reports can be made via our reporting channels which can be found in Annexure A of our Speak Up Procedure.

Unless consent is provided, the identity of an individual(s) who participates in the process will be kept confidential, unless required to be disclosed by law. That person will also be free from victimisation and other detrimental conduct.

Disclosure and investigation process

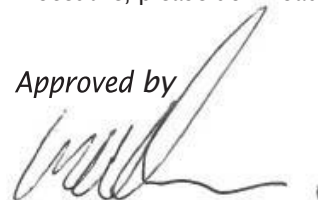
An investigation will ordinarily include the following steps:

- speaking to the whistleblower to obtain more information (if possible)
- reaching a decision as to who will form the investigation team and conduct the investigation
- informing the person (or group of people) to whom the disclosable matter relates (if it is a particular person, or group of individuals) that a report has been received and is being investigated
- ascertaining whether there are any potential witnesses who should be interviewed and speaking to those witnesses (if any)
- accessing and reviewing relevant material including emails, historic documents, financial information, records, communications, and the like
- preparing a report to document the outcomes of the investigation.
- Update to the Whistleblower on conclusion (where appropriate and possible)

The eligible whistleblower will be kept informed of the progress and the outcome of the investigation, to the extent possible, having regard to GEC's policies and duties.

All Whistleblowers will receive the protections available to them under the applicable laws (such as the Corporations Act). To review the full Speak Up Procedure, please download a copy [here](#).

Approved by



Chris Williams

Chief Executive Officer

Global Engineering & Construction Pty Ltd

31 October 2023