

Whistleblower Policy

Policy brief & purpose

Elite Project Solutions (EPS) expects all employees and contractors to uphold the highest standards of ethics in their conduct. Honesty and integrity are paramount when fulfilling responsibilities and adhering to all applicable laws and regulations.

Scope

This policy aims to ensure everyone adheres to these obligations. It encourages reporting of potential or suspected violations and offers robust protection from retaliation for those who come forward. Confidentiality and proper report handling are essential elements of this process. All personnel receive training on the Whistleblower Policy during company inductions, ensuring understanding and adherence.

Policy elements

The Directors authorise this policy, and any amendments require their prior approval. The Directors encourage employees to report serious breaches of the Code of Conduct they witness or experience, which warrant investigation by the Report and Investigation Officer.

Everyone at **EPS** has a responsibility to comply with the Code of Conduct and report any violations or suspected violations according to this policy. This Policy provides a pathway for reporting and investigating unlawful discrimination, victimisation, harassment, and retaliation based on protected characteristics.

This policy encourages and enables employees and others to raise serious concerns within the company. In most cases, employees should first approach their supervisor, as they may be in the best position to address the issue. If uncomfortable speaking with their supervisor or unsatisfied with their response, employees are encouraged to speak with any management member they feel comfortable approaching. Supervisors, Managers, and Directors are required to report suspected violations of the Code of Conduct to the Report and Investigation Officer, who holds the sole responsibility for investigating all reported violations.

The Report and Investigation Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Company's Code of Conduct. The Officer must inform the Directors of any serious breaches of the Code of Conduct reported under this policy.

Anyone filing a complaint concerning a potential or suspected violation of the Company's Code of Conduct must have objectively reasonable grounds to suspect the information disclosed indicates a violation. Making unsubstantiated allegations, particularly those known to be false or made maliciously, is a serious disciplinary offence.

Reports of violations or suspected violations will be kept confidential. The identity of the reporting person may only be disclosed to ASIC, APRA, a member of the Australian Federal Police, or someone else with the discloser's consent, as necessary for conducting an adequate investigation.

If the reporting person does not consent to their identity being disclosed, **EPS** will:



- Take reasonable steps to protect their identity, such as removing their name, position title, team or department, and any other identifying details from any disclosure.
- Ensure any investigation does not comment on or attribute the source of the report.
- The company will also preserve the anonymity of individuals who report anonymously, and the Report and Investigation Officer will not disclose their identity except with their consent.

The Report and Investigation Officer will notify the person who reported the alleged violation and acknowledge receipt of the report within five business days. All reports will be promptly investigated, and if warranted, appropriate corrective action will be taken. During investigations, the Officer and any assisting staff must comply with this policy's confidentiality obligations, particularly regarding the reported information, the identity of the discloser, and any information that could lead to their identification.

The person who reported the violation will have the option to receive a summary of the investigative steps taken by the Report and Investigation Officer and the outcome of the investigation.

APPROVED:

This Policy will be reviewed every 12 months to ensure its appropriateness, accuracy and value.

Craig Riding

Director

Derek McGuinness

Director