

Whistleblower Policy

INTRODUCTION AND RATIONALE

This Whistleblower Policy outlines what constitutes a qualifying disclosure, who can make such disclosures, the protections afforded to whistleblowers, and the steps SFMCA may take in response. The policy applies to SFMCA and its operations, ensuring individuals can safely, securely, and confidently disclose wrongdoing, knowing they will be protected and supported.

The objectives of this policy are to:

- Encourage disclosures of wrongdoing
- Deter wrongdoing within SFMCA
- Ensure individuals can disclose wrongdoing safely and with confidence
- Ensure disclosures are handled appropriately and promptly
- Provide transparency around SFMCA's framework for receiving, handling, and investigating disclosures
- Support SFMCA's long-term sustainability and reputation
- Meet SFMCA's legal and regulatory obligations

SCOPE AND RESPONSIBILITY

This policy applies to any:

- SFMCA Board director
- SFMCA employee
- Person who supplies goods or services (paid or unpaid) to SFMCA
- Employee of a person who supplies goods or services to SFMCA
- Individual who is an associate of SFMCA (as defined in the Corporations Act)
- Relative or dependent (or dependents of a spouse) of any individual described above

RESPONSIBILITIES

Executive officer: Oversight of policy implementation.

Eligible Recipients: As described throughout the document.

SFMCA Staff: Adhere to this policy and related procedures.

POLICY PRINCIPLES

Ensuring all employees are aware of this policy and how to report misconduct

Guaranteeing confidentiality of whistleblowers

Implementing secure reporting channels

Protecting whistleblowers from retaliation

Providing support services for whistleblowers

Creating a safe environment for reporting wrongdoing

Promoting a culture of transparency and integrity

Providing multiple accessible reporting channels

Promptly investigating whistleblower reports

Ensuring investigations are thorough, fair, and impartial

Holding wrongdoers accountable

Providing feedback to whistleblowers, where appropriate

Demonstrating top-down commitment to ethical behaviour and whistleblowing

PROCEDURES

What is a Qualifying Disclosure? A qualifying disclosure is when an eligible whistleblower makes a disclosure to an eligible recipient, with reasonable grounds to suspect the information concerns a disclosable matter.

Who Can Make a Qualifying Disclosure? An eligible whistleblower is anyone listed under the Scope above, in relation to SFMCA.

Anonymous Disclosures: Disclosures can be made anonymously and still be protected under the Corporations Act. SFMCA encourages whistleblowers to provide sufficient information for proper investigation and, if possible, an anonymous contact method.

Disclosable Matters: Includes misconduct, improper state of affairs, illegal activity, or conduct representing a danger to the public or financial system.

Personal Work-Related Grievances: Generally, personal work-related grievances do not qualify for protection unless they also involve misconduct or other qualifying factors.

Who Can Receive a Qualifying Disclosure? Eligible recipients include SFMCA Board Directors, Executive officer, and auditors.

External Disclosures: Disclosures may also qualify for protection if made to ASIC, APRA, a prescribed Commonwealth authority, or a legal practitioner for advice.

Investigating a Qualifying Disclosure: Upon receiving a disclosure, SFMCA will assess whether it qualifies for protection and determine the appropriate investigation process.

Confidentiality and Records: The identity of the whistleblower and information likely to identify them must be kept confidential, with exceptions only as required by law or with the whistleblower's consent.

Whistleblower Protections and Support: Whistleblowers are protected from civil, criminal, or administrative liability for making a disclosure. SFMCA will take steps to prevent and address any detriment or victimisation resulting from a disclosure.

Remedies: Remedies for detriment may include compensation, injunctions, apologies, reinstatement, or exemplary damages.

Contact: For queries about this policy, contact the SFMCA Executive Officer.