

Whistleblower Policy

Purpose

ECMS is committed to a culture of integrity, accountability and transparency. This policy outlines how we support and protect people who speak up about suspected misconduct, in line with our legal obligations under the Corporations Act 2001 (Cth), Part 9.4AAA.

Scope

This policy applies to eligible whistleblowers connected to ECMS, including current and former:

- Employees, volunteers, contractors, and suppliers
- Associates or relatives of these individuals

Concerns related to personal work grievances or general complaints (e.g. by families) are not covered by this policy. These should be managed via ECMS's grievance or complaints processes.

What Can Be Reported

Disclosures are protected under this policy when they relate to suspected misconduct, including but not limited to:

- Fraud, bribery or corruption
- Unethical or unlawful conduct
- Breaches of legal or regulatory obligations
- Systemic risks to health, safety, or the environment.

Who You Can Report To

Eligible disclosures can be made to:

- A member of the ECMS Executive Team
- A member of the ECMS Board
- The ECMS external auditor
- A Whistleblower Protection Officer (WPO)
- ASIC, ACNC or another prescribed body.

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If you need to report about a Board member or WPO

If the disclosure relates to the conduct of a nominated Whistleblower Protection Officer a Board member, or the Board Chair and the discloser reasonably believes it is not appropriate to report the matter to that person, the disclosure should instead be directed to:

- An alternative WPO (if applicable)
- The Chair of the Audit and Risk Committee, or
- An external eligible recipient, such as ASIC, the ATO or an independent legal advisor.

Where a disclosure involves any of the above parties, appropriate steps will be taken to ensure the subject of the disclosure is excluded from all handling, investigation and decision-making processes related to the matter.

Whistleblower Protection Officers (WPO)

Once a disclosure is received, it will be referred to a trained Whistleblower Protection Officer (WPO) who will manage the process. They are responsible for:

- Maintaining confidentiality
- Providing guidance on the process
- Ensuring protection is upheld.

Your Rights and Protections

Under the Corporations Act 2001 (Cth), whistleblowers are legally protected. ECMS will:

- Keep your identity confidential (unless legally required otherwise)
- Prevent and respond to any victimisation or detriment
- Investigate disclosures fairly and objectively
- Provide support services throughout the process.

You do not need to prove your concern – reasonable grounds are sufficient. All investigation records will be stored securely and only shared on a strict need-to-know basis.

In certain circumstances, whistleblowers may make an emergency or public interest disclosure to a journalist or Member of Parliament (MP) and still receive legal protections, under the Corporations Act 2001 (Cth). An emergency disclosure applies when there is a reasonable belief that the matter involves a substantial and imminent danger to the health or safety of people or the environment. Specific conditions apply, including prior disclosure to a regulatory body such as ASIC and/or ACNC written notice of intention. Further details are available in ASIC's guidance [Whistleblower rights and protections](#) | [ASIC](#)

Making an Anonymous Report

Anonymous disclosures are accepted and protected. However, providing some level of contact may help facilitate effective investigation and support.

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Further Information

This policy is supported by a confidential internal procedure that guides how ECMS manages and investigates disclosures. For further information or to make a report, please email whistleblowerdisclosures@ecms.org.au which is accessed by the four appointed ECMS WPOs or alternatively, you can phone the whistleblower hotline on 03 5367 0473 or email one of the four individually:

CEO – Kieren Kearney: kkearney@ecms.org.au

Director People – Amanda Hughes: ahughes@ecms.org.au

Company Secretary – Sue McKean: smckean@ecms.org.au

Board Chair – Vanda Fortunato: mail@vandafortunato.com

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