


AAC Policy Document		
POL_2.7.2 Version 1	WHISTLE BLOWING POLICY	

Please note that the procedures below are designed for a whistle-blowing policy. It is not meant for reporting work place grievances.

Procedure for Work Place Grievances

For work place grievances or when any employee believes reasonably and in good faith that malpractice exists in the work place, the employee report this immediately to the appropriate Head of Department. However, if for any reason there is reluctance to do so, the reporting could be to either one or more of the following:

- the HOD in charge of human resources;
- the Chairman of AAC; or
- the Group Managing Director.

Whistle-Blowing Policy

All employees of AAC or any other persons are encouraged to raise genuine concerns about possible improprieties in matters of financial reporting and other malpractices at the earliest opportunity, and in an appropriate way.


This policy is designed to:

- support our values, especially those of AAC's zero tolerance towards dishonesty and corrupt practices;
- provide a formal and transparent process for employees and any other AAC-related persons, such as vendors, customers, contractors and consultants, to confidentially raise concerns without fear of suffering retribution;
- enable Management to take appropriate action on a timely basis on any impropriety, misconduct and other malpractice; and
- foster and develop a corporate culture of openness, accountability and integrity in AAC.

Scope of the Whistle-Blowing Policy

This Policy covers defalcation, impropriety, or wrongdoing by employees and/or other AAC-related persons in the following situations, including but not limited to:

- intentional improprieties in matters of financial reporting;
- fraud;
- corruption, bribery or blackmail;
- criminal offences;
- abuse and misrepresentation of power and authority;

AAC Policy Document		
POL_2.7.2 Version 1	WHISTLE BLOWING POLICY	

- failure to comply with a legal or regulatory obligation;
- misappropriation of funds, securities, supplies or other assets
- trading in listed securities while having insider knowledge
- disclosure of confidential or proprietary information to external parties.
- unlawful, unethical or dishonest conduct.
- miscarriage of justice;
- endangering the health and safety of an individual; and
- concealment of any of the above.

Principles of the Whistle-Blowing Policy


- All concerns raised will be treated fairly and properly.
- AAC will not tolerate the harassment or victimisation of anyone raising a genuine concern.
- Any individual making a disclosure will retain his/her anonymity unless agreed otherwise.
- AAC will ensure that any individual raising a concern is aware of who is handling the matter.
- AAC will ensure no one will be at risk of suffering any form of retribution as a result of raising a concern even if mistaken. However, this assurance is not extended to those who maliciously raises a matter they know to be untrue.
- Any investigative activity, if deemed necessary, will be conducted without regard to the suspected or alleged personnel's length of service or position.

Procedures of the Whistle-Blowing Policy

1. Any employee who reasonably suspects or is aware of another employee(s) committing misconduct should report directly to one or more of the persons listed in the Appendix.
2. Whistle-blowers should provide basic information such as:
 - (a) The background (who, what, when, where, how).
 - (b) The reason and basis for raising the concern.
 - (c) Any available evidence to support the concern.

Confidentiality

1. Whistle-blowers are encouraged to put their name to any disclosures they make. Employees' and any other persons' identities will not be disclosed without prior consent (except where disclosure obligations are required under law and regulations). Where concerns are unable to

AAC Policy Document		
POL_2.7.2 Version 1	WHISTLE BLOWING POLICY	

be resolved without revealing the identity of the employee and any other persons raising the concern, (e.g., if their evidence is required in court), AAC will, after consultation with legal counsel, enter into a dialogue with the reporting person(s) on how to further proceed.

2. All reports will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. This is important to avoid damaging the reputation of suspected person(s), but subsequently found innocent of wrongful conduct, and to protect AAC from potential civil liability.

3. Until the investigation is completed, the identity of the employee(s) under investigation will be kept confidential and treated fairly. On the completion of the investigation, the name of the alleged employee(s) may or may not be disclosed depending on the nature, extent and circumstances of the incident and is subject to AAC's decision in consultation with legal counsel (where necessary).

4. Except for cases that are reported to the appropriate external authorities (e.g. CPIB, Police, CPE, MOF), AAC shall ensure the confidentiality and protection of those reporting on their concerns in good faith.

APPENDIX

Contact details for whistle-blowing reporting:

Chairman & Independent Director, Academies Australasia Group Ltd (group holding company)
Mr John Schlederer
Email: john@schlederer.net

Where the whistle-blower thinks that an independent party is needed, the report should be to:

Academies Australasia Group's external auditor.

Approval Authority: Chief Executive Officer		
Policy Owner: HOD, Human Resources		
Revision History V1		
Rev	Description of Change	Effective Date
1	New	10/10/2016