Whistleblower Policy

OVERVIEW

At Alex D&D Training we are guided by our company values. These values are the foundation of how we conduct ourselves and interact with each other, our clients, members, suppliers, shareholders and other stakeholders. The Company is committed to ensuring corporate compliance and promoting ethical corporate culture by observing the highest standards of fair dealing, honesty and integrity in our business activities.

PURPOSE

The policy has been put in place to ensure any concerns raised regarding any misconduct or improper state of affairs or circumstances in relation to the Company's business are dealt with effectively, securely, appropriately, and in accordance with the Corporations Act 2001 (Cth) (the Act).

The Company encourages the reporting of any instances of suspected unethical, illegal, corrupt, fraudulent or undesirable conduct involving the Company's business and provides protections and measures to individuals who make a disclosure in relation to such conduct without fear of victimisation or reprisal.

This policy will be provided to all employees and officers of the Company upon commencement of their employment or engagement.

SCOPE

This policy applies to any person who is, or has been, any of the following with respect to the Company: Employee;

Officer;

Director;

Contractor (including sub-contractors and employees of contractors); Supplier (including employees of suppliers);

Consultant; Auditor; Associate; and

Relative, dependant, spouse, or dependant of a spouse of any of the above.

This policy is intended to apply to the above persons in all countries in which the Company operates a business.

REPORTABLE CONDUCT

You may make a report or disclosure under this policy if you have reasonable grounds to believe that a Company director, officer, employee, contractor, supplier, consultant or other person who has business dealings with the Company has engaged in conduct (Reportable Conduct) which is:

Dishonest, fraudulent or corrupt;

Illegal (such as theft, dealing in or use of illicit drugs, violence or threatened violence and criminal damage to property);

Unethical including any breach of the Company's policies such as the Code of Conduct; Oppressive or grossly negligent;

Potentially damaging to the Company, its employees or a third party; Misconduct or an improper state of affairs;

A danger, or represents a danger to the public or financial system; Harassment, discrimination, victimisation or bullying.

Any disclosures that do not fall within the definition of Reportable Conduct, will not qualify for protection under the Act. It will be at the

Company's discretion whether it considers there is a reasonable suspicion that the Reportable Conduct is occurring and/or whether the conduct constitutes "misconduct or improper state of affairs" under the Act.

For the avoidance of doubt, Reportable Conduct does not include personal work-related grievances. A personal work-related grievance is a grievance about any matter in relation to a staff member's current or former employment, having implications (or tending to have implications) for that person personally and that do not have broader implications for the Company. Examples of personal work-related grievances are as follows:

An interpersonal conflict between the staff member and another employee;

A decision relating to the engagement, transfer or promotion of the staff member; A decision relating to the terms and conditions of engagement of the staff member;

A decision to suspend or terminate the engagement of the staff member, or otherwise to discipline the staff member.

Personal work-related grievances should be reported to your manager or in accordance with the Company's Grievance Policy.

MAKING A DISCLOSURE

The Company relies on its employees maintaining a culture of honest and ethical behaviour. Accordingly, if you become aware of any Reportable Conduct, it is expected that you will make a disclosure under this policy.

There are several ways in which you may report or disclose any issue or behaviour which you consider to be Reportable Conduct.

Internal Reporting

You may disclose any Reportable Conduct to the Whistleblower Protection Officers listed below:

Human Resources Manager

Uzoamaka Ekhator

Telephone: 03301136691

Email: info@alexdd.co.uk

Chief Executive Officer

Efosa Ekhator

Telephone: 07721796756

Email: Efosa.ekhator@alexdd.co.uk

You can make a disclosure outside of business hours by contacting the above Whistleblower Protection Officers via email.

You are also encouraged to contact the above Whistleblower Protection Officers to obtain any additional information you may require before making a disclosure or for any clarification regarding this policy.

If you are unable to use any of the above reporting channels, a disclosure can be made to an “eligible recipient” within the Company. Eligible recipients include:

Officers;

Directors;

Senior Managers;

Auditor or member of an audit team conducting an audit of the Company;

Actuary.

The Whistleblower Protection Officer or eligible recipient will safeguard your interests and will ensure the integrity of the reporting mechanism.

External Reporting

Where you do not feel comfortable making an internal report, or where you have made an internal report, but no action has been taken within a reasonable time, you may disclose any Reportable Conduct to the Company’s external auditor/external independent whistleblower service [Insert name] using any of the following methods:

help@alexdd.co.uk

01113885487

Calls will be received by Morgan Dave during business hours between 9am] and 5pm and can also be accessed after business hours by contacting [Person Name]. Your call

will not be recorded and the person taking your call is not associated with the Company in any way.

They are trained specialists dedicated to dealing with whistleblowers and their concerns.

[Person Name] will prepare a report which details the concerns raised by you to a Whistleblower Protection Officer. Any information contained in the report will be kept confidential, except as required by law or where disclosure is necessary to regulatory authorities, law enforcement agencies or professional advisors to the Company.

Anonymity

When making a disclosure, you may do so anonymously. It may be difficult for the Company to properly investigate the matters disclosed if a report is submitted anonymously and therefore the Company encourages you to share your identity when making a disclosure, however you are not required to do so.

Where a disclosure has been made externally and you provide your contact details, those contact details will only be provided to a Whistleblower Protection Officer with your consent.

Reporting to Regulators

You may also make a disclosure to the [Insert relevant government body] in relation to a Reportable Conduct. You will be covered by the protections outlined in this policy if you have reported your concerns to [Insert relevant government body]

Reporting to a Legal Practitioner

You may choose to discuss your concerns with a legal practitioner for the purposes of obtaining legal advice or representation. You will be covered by the protections outlined in this policy if you have reported your concerns to a legal practitioner.

Public Interest and Emergency Disclosure

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In certain situations, the conduct or wrongdoing may be of such gravity and urgency that disclosure to the media or a parliamentarian is necessary.

A public interest and emergency disclosure can only be made to:

A journalist, defined to mean a person who is working in a professional capacity as a journalist for a newspaper, magazine, or radio or television broadcasting service; or

A Member of the Parliament

You may only make a public interest and emergency disclosure if:

You have previously disclosed the information to [Insert relevant government body];

At least 90 days has passed since the previous disclosure was made;

You have reasonable grounds to believe that action is not being taken to address the matters which you have disclosed;

You have reasonable grounds to believe that making a further disclosure to a journalist or member of parliament would be in the public interest;

You have given written notification, including sufficient information to identify the previous disclosure to the authority to which the previous disclosure was made that you intend on making a public interest disclosure; and

You have given written notification, including sufficient information to identify the previous disclosure to the authority to which the previous disclosure was made that you intend on making a public interest disclosure; and

The extent of information disclosed is no greater than is necessary to inform the recipient of the misconduct or improper state of affairs.

You will be qualified for protection where you have made a public interest disclosure if:

You have previously disclosed the information to [Insert relevant government body];

You have reasonable grounds to believe that the information concerns a substantial and imminent danger

to the health or safety of one or more persons, or to the natural environment; and

You have given written notification, including sufficient information to identify the previous disclosure to the authority to which the previous disclosure was made that you intend on making a public interest disclosure; and

No more information is disclosed than is reasonably necessary to inform the recipient of the substantial and imminent danger.

INVESTIGATION

The Company will investigate all matters reported under this policy as soon as practicable after the matter has been reported. The Whistleblower Protection Officer will investigate the matter and where necessary, appoint an external investigator to assist in conducting the investigation. All investigations will be conducted in a fair, independent and timely manner and all reasonable efforts will be made to preserve confidentiality during the investigation.

If the report is not anonymous, the Whistleblower Protection Officer or external investigator will contact you, by your preferred method of communication to discuss the investigation process and any other matters that are relevant to the investigation.

Where you have chosen to remain anonymous, your identity will not be disclosed to the investigator or to any other person and the Company will conduct the investigation based on the information provided to it.

Where possible, the Whistleblower Protection Officer will provide you with feedback on the progress and expected timeframes of the investigation. The person against whom any allegations have been made will also be informed of the concerns and will be provided with an opportunity to respond (unless there are any restrictions or other reasonable bases for not doing so).

To the extent permitted by law, the Whistleblower Protection Officer may inform you and/or a person against whom allegations have been made of the findings. The Company will document the findings in a report however any report will remain the property of the Company and will only be shared with you or any person against whom the allegations have been made if the Company deems it appropriate.

PROTECTION OF WHISTLEBLOWERS

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The Company is committed to ensuring that any person who makes a disclosure is treated fairly and does not suffer detriment and that confidentiality is preserved in respect of all matters raised under this policy.

Protection from Legal Action

You will not be subject to any civil, criminal or administrative legal action (including disciplinary action) for making a disclosure under this policy or participating in any investigation.

Any information you provide will not be admissible in any criminal or civil proceedings other than for proceedings in respect of the falsity of the information.

Protection against Detrimental Conduct

The Company (or any person engaged by the Company) will not engage in 'Detrimental Conduct' against you if you have made a disclosure under this policy.

Detrimental Conduct includes actual or threatened conduct such as the following (without limitation):

Termination of employment;

Injury to employment including demotion, disciplinary action;

Alternation of position or duties;

Discrimination;

Harassment, bullying or intimidation; Victimisation;

Harm or injury including psychological harm; Damage to a person's property;

Damage to a person's reputation;

Damage to a person's business or financial position; or

Any other damage to a person.

The Company also strictly prohibits all forms of Detrimental Conduct against any person who is involved in an investigation of a matter disclosed under the policy in response to their involvement in that investigation.

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The Company will take all reasonable steps to protect you from Detrimental Conduct and will take necessary action where such conduct is identified. If appropriate, the Company may allow you to perform your duties from another location or reassign you to another role (at the same level) or make other modifications to your workplace or your duties to protect you from the risk of detriment.

If you are subjected to Detrimental Conduct as a result of making a disclosure under this policy or participating in an investigation, you should inform a Whistleblower Protection Officer or eligible recipient in accordance with the reporting guidelines outlined above.

You may also seek remedies including compensation, civil penalties or reinstatement if:

You suffer loss, damage or injury because of a disclosure; and

The Company failed to take reasonable precautions and exercise due diligence to prevent any Detrimental Conduct.

Protection of Confidentiality

All information received from you will be treated confidentially and sensitively.

You will not be required to provide your name when making a disclosure. To make a disclosure on an anonymous basis, it is recommended that you use a pseudonym and contact the Whistleblowing Protection Officers in the manner outlined above.

If you report on an anonymous basis, you will still qualify for the protections in this policy.

If you make a disclosure under this policy, your identity (or any information which would likely to identify you) will only be shared if:

You give your consent to share that information; or

The disclosure is allowed or required by law (for example where the concern is raised with a lawyer for the purposes of obtaining legal advice); or

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The concern is reported to [Insert relevant government body]

Where it is necessary to disclose information for the effective investigation of the matter, and this is likely to lead to your identification, all reasonable steps will be taken to reduce the risk that you will be identified. For example, all personal information or reference to you witnessing an event will be redacted from any report, you will be referred to in a gender-neutral context, where possible you will be contacted to help identify certain aspects of your disclosure that could inadvertently identify you. Any disclosure under this policy will also be handled and investigated by qualified staff.

The Company will also take the following measures for protecting your identity:

All paper and electronic documents and other materials relating to disclosures will be stored securely;

Access to all information relating to a disclosure will be limited to those directly involved in managing and investigating the disclosure;

Only a restricted number of people who are directly involved in handling and investigating a disclosure will be made aware of your identity (subject to your consent) or information that is likely to lead to your identification;

Communications and documents relating to the investigation of a disclosure will not be sent to an email address or to a printer that can be accessed by other staff; and

Each person who is involved in handling and investigating a disclosure will be reminded about the confidentiality requirements, including that an unauthorised disclosure of your identity may be a criminal offence.

If you are concerned that your identity has been disclosed in relation to a disclosure, and without your consent, you should inform a Whistleblower Protections Officer or eligible recipient immediately.

SUPPORT AVAILABLE

Any employee who makes a disclosure under this policy or is implicated as a result of a disclosure that is made may access the Company's Employee Assistance Program (EAP) which is a free and confidential counselling service on Contact Details.

Where appropriate, the Company may also appoint an independent support person from the Human Resources team to deal with any ongoing concerns you may have.

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You may also access third party support providers such as Lifeline (13 11 14) and Beyond Blue (1300 22 4636) for support.

OTHER MATTERS

Any breach of this policy will be taken seriously and may result in disciplinary action, up to and including termination of employment.

In so far as this policy imposes any obligations on the Company, those obligations are not contractual and do not give rise to any contractual rights. To the extent that this policy describes benefits and entitlements for employees, they are discretionary in nature and are also not intended to be contractual. The terms and conditions of employment that are intended to be contractual are set out in an employee's written employment contract.

The Company may unilaterally introduce, vary, remove or replace this policy at any time.

Employees are encouraged to read this policy in conjunction with other relevant Company policies, including Code of Conduct and Grievance Policy.

This policy will be reviewed annually.

Next review date : 30/11/2026.

Responsible person: Efosa Ekhator.