



**CITY TATTERSALLS**  
**GROUP**

# Whistleblower Policy

## Purpose

City Tattersalls Club is committed to a culture of ethical behaviour and corporate compliance. This Whistleblower Policy is an important tool in helping:

- to encourage the disclosure of wrongdoings;
- to ensure individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported;
- to ensure disclosures are dealt with appropriately and in a timely manner;
- to provide transparency around the Club's framework for receiving, handling and investigating disclosures;
- to support the Club's values;
- to support the Club's reputation; and
- to meet the Club's legal and regulatory obligations.

## Application

This policy applies to all current or former employees, contractors, members and members of the Board of Directors of City Tattersalls Club. All of these individuals are classed as eligible whistleblowers, as well as their relatives, dependants or spouses.

The law that this policy is governed by is enforced by the Australian Securities & Investments Commission (ASIC).

## Policy

This policy provides protections under the *Corporations Act 2001* to an eligible whistleblower (as described in the Application of this policy) making an allegation of misconduct, malpractice or conflicts of interest. Allegations of this nature should be made where an eligible whistleblower has reasonable grounds to suspect that conduct pursuant to this policy has, is currently or will take place.

These protections include confidentiality for eligible whistleblowers (as described in the Application of this policy), and protections against any adverse action as a result of raising allegations relating to misconduct, malpractice or conflicts of interest.

Examples of reportable conduct pursuant to this policy include, but are not limited to:

- Fraud;
- Corruption;
- Illegal activities such as money laundering, theft, violence, threatened violence, dealing in or use of illicit drugs, and criminal damage against property;
- Unethical behaviour;
- Unsafe work practices;

- Breach of Commonwealth or State legislation and Acts;
- Other serious misconduct including gross mismanagement, serious and substantial waste of Club resources and repeated breaches in administrative procedures;
- Any conduct which may cause financial or non-financial loss to the Club or be otherwise detrimental to the interests or reputation of the Club or any of our employees;
- A deliberate concealment of information tending to show any of the matters listed above.

Subject to this policy, a whistleblower is protected even if the allegations prove to be incorrect or unsubstantiated.

If a whistleblower suffers any loss, damage or injury because of an allegation, or the Club fails to take reasonable precautions and due diligence to prevent detrimental conduct, the the whistleblower can seek compensation through the court system.

### **Protections for Employees**

This policy protects whistleblowers who are employees against any adverse employment action by the Club, it's Board of Directors or agents as a result of raising an allegation. This protection applies to any employee providing information related to an investigation pursuant to this policy.

Adverse employment action includes, but is not limited to:

- Dismissal;
- Suspension;
- Demotion;
- Threatening or harassing behaviour;
- Transfer to an undesirable job or location;
- Discrimination in any manner.

This policy is not designed to deal with solely personal, work-related grievances and complaints. Employees should refer to the City Tattersalls Club Grievance Policy in these instances. This policy may still apply to a personal complaint in certain circumstances, such as if the personal, work-related grievance includes information about misconduct or malpractice on a wider or systemic scale, or if there is actual or threatened adverse action as a result of raising an allegation.

To maintain the integrity of this policy, employees should be aware that if a false allegation is deliberately or maliciously made by an employee, or is made for personal gain, then that employee may face disciplinary action.

### **Protections for Members, Contractors and the Board of Directors**

This policy protects whistleblowers who are members, contractors, or members of the Board of Directors against any adverse action by the Club, it's Board of Directors or agents as a result of raising an allegation.

Adverse action includes, but is not limited to:

- Members - will not be penalised in any way, inclusive of having their Club membership revoked.
- Contractors - will not be penalised in any way, inclusive of having their contracts with the Club terminated.
- Directors will not be penalised in any way, inclusive of being terminated from the Board.



## General Protections

Any adverse action found to be taken against a whistleblower by any representative of the Club will be considered a serious breach of this policy, and will result in disciplinary action up to and including dismissal of the individual displaying detrimental behaviour.

This policy protects the identity of the whistleblower and provides confidentiality in this regard. Every measure will be taken to preserve the confidentiality of the individual making the report. The only circumstances where a whistleblower's identity may be disclosed are the following:

- Where an identity is disclosed to ASIC, or a member of the Australian Federal Police;
- Where an identity is disclosed to a legal practitioner for the purpose of obtaining legal advice or legal representation;
- Where an identity is disclosed with the permission of the whistleblower;

## Reporting Procedure

The Club would like to identify and address any allegations as early as possible, and therefore encourages any eligible whistleblower who has reasonable grounds to suspect that conduct pursuant to this policy has, is currently or will take place to report this information to an eligible recipient within the Club.

Eligible recipients include the Club's:

- Chief Executive Officer
- Chief Operating Officer
- Head of People & Culture

You may choose to notify ASIC directly as an external party, and/or seek your own legal advice or representation. Reports made to these external parties are also protected under the *Corporations Act 2001*.

You may make a report in person, by email, by telephone or by post. A whistleblower may make a report anonymously if they prefer, and the whistleblower will still be protected under the *Corporations Act 2001*. The Club encourages individuals to provide their identity if they feel comfortable doing so to aid in the investigation procedure, and allow follow-up contact between the parties.

All allegations made under this policy should provide specific, adequate and pertinent information with respect to dates, locations, persons/witnesses and any other information that will allow for a thorough investigation.

## Investigations

Investigations will be conducted promptly and fairly with due regard for the nature of the allegation and the rights for the persons involved in the investigation. Evidence, including any materials, documents or records shall be held securely by the investigator. The CEO, COO and Head of People and Culture will determine if the allegation is, in fact, pertinent to any of the issues mentioned in this policy. They will then determine the appropriate method of investigation, and may seek the assistance of an internal or external accounting or legal specialist if they deem necessary.

During the investigation, the investigator will have access to all of the relevant materials, documents and records. The persons involved in the complaint must fully cooperate with the investigator. During the investigation, the investigator will use all reasonable means to protect the confidentiality of the identity of the whistleblower. The whistleblower can choose to remain anonymous while making the report, over the course of the investigation and after the investigation is finalised. A pseudonym can be used as a measure to protect the identity of the whistleblower if requested.

## **Reporting**

At the conclusion of the investigation, the investigator will prepare a report of the findings for the CEO. Where the final report indicates that the allegation is substantiated, the final report will include recommendations for steps to be taken to prevent the conduct from occurring in the future. It will also include any action that should be taken to remedy any harm or loss arising from the conduct, including disciplinary proceedings against the person responsible for the conduct and the referral of the matter to the appropriate authorities, as deemed necessary by the CEO or COO.

Any material violations and any actions that may be required as a result of the investigations will be reported to the Board of Directors.

Provided the claim was not disclosed anonymously, the whistleblower will be kept informed of the outcomes of the investigation, subject to the considerations of privacy of those against whom the allegations were made.

## **Contact Information**

You can make a report via the below contact details. Alternatively, you may an appointment in person with the eligible recipients.

### **Post**

Private & Confidential  
Attention: [City Tattersalls Club]  
Mr William Corbett / Miss Chantelle Tomblin  
Castlereagh Boutique Hotel  
169 Castlereagh St,  
Sydney NSW 2000

### **Phone**

Mr William Corbett - 02 9287 6415  
Miss Chantelle Tomblin - 02 9287 6439

To make a report anonymously to the Club, please complete the form attached to this policy and send to the above postal address.

To report to ASIC, you may write to them at:

Australian Securities and Investments Commission  
GPO Box 9827  
Brisbane QLD 4001

# Whistleblower Report Form

<b>Date</b>	
<b>Time</b>	
<b>Report Details</b>	
<b>Contact Details</b> <i>Optional</i>	