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	Issue Date: 30-11-22	Version No. 2	Authorised By: Paul White	
Whistle-blower Policy				

1. PURPOSE

The Pye Group of Companies which includes Zerella Fresh, Parilla Premium Potatoes and Parilla Transport (also referred to as Pye Group) is committed to upholding the highest standards of integrity, fairness and ethical conduct.

This Policy aims to protect and support those who make disclosures of misconduct and to provide a reporting and investigation process.

Pye Group will not tolerate any retaliatory action or threats of retaliatory action against a person reporting such misconduct (referred to as a whistle-blower) or any person involved in the investigation process.

The purpose of this Policy is to:

- Encourage the reporting of wrongdoing
- Protect and support those who report wrongdoing
- Set out a safe reporting mechanism
- Outline Pye Group's processes for investigating and dealing with reports of wrongdoing

2. SCOPE

Pye Group encourages the reporting of known misconduct and/or reasonable suspicions of misconduct (wrongdoing). Reports may include conduct internal to the Pye Group and conduct external to the Pye Group including suppliers and customers.

Anyone with information about potential wrongdoing relating to Pye Group is encouraged to report their concerns under this Policy. This includes all stakeholders of the Pye Group as below:

- Employee of Pye Group
- Contractor or supplier of goods and services to Pye Group
- Customers
- Associate of Pye Group or
- Other Parties

3. RESPONSIBILITIES


Disclosing Person must:

If a Disclosing Person becomes concerned about possible illegal, unethical or otherwise improper conduct that they think is not being properly handled within Pye Group, it is critical that they take steps to advise the Pye Group through this Whistle-blower Policy.

Managers / Supervisors must:

- Discuss any concerns with their staff and outline the mechanisms available to raise complaints, concerns and grievances including Whistleblowing Complaints.
- Protect Whistle-blower confidentiality and rights as required and as requested by the Whistle-blower.
- Respond to Whistleblowing Complaints in accordance with this Policy.

Human Resources must:

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- Provide information about the complaints processes, options for assistance/support and protections from victimisation.
- Follow due process and ensuring the allegations are fully documented and managed with the upmost care and due diligence.
- Explain the confidentiality requirements to all stakeholders and that it is unlawful to victimise someone who has made a complaint.
- Accept and respond to Whistleblowing Complaints in accordance with this Policy.

Whistleblowing Investigative Team (which may consist of impartial senior management) must:

- Respond to the complaints and determine whether the report falls within the scope of this Policy.
- Provide advice and support to reporters.
- Maintain confidentiality.
- Maintain a secure and restricted record of all reports made.
- Manage the investigative process in accordance with this Policy and determining how the complaint should be investigated.
- Gather and document evidence.
- Report matters to relevant authorities as required.
- Provide informed, timely and non-prejudicial responses to relevant authorities as required.
- Make findings and determinations which are documented and formalised in a final report.
- Determine the appropriate course of action to remediate or act on the investigation.
- Manage the communication with Respondent/s, Whistle-blower, and others involved in the complaint and investigation during and after the process.

4. PROCEDURE

There are a number of ways to raise concerns effecting the Pye Group, depending on the circumstances and the seriousness of the issue.

Speaking to a Supervisor / Manager

Often day to day issues can be resolved between employees through open and authentic conversation, as part of normal team dynamics.

Employees can escalate to their manager if they are concerned about an issue or want support to resolve an issue. Pye Group encourages employees to continue to feel empowered to raise issues in this way.


Reporting to HR

All whistleblowing disclosures can be made via Human Resources. The disclosures will be treated as confidential.

Anonymous whistle-blower report

A Whistle-blower may not feel comfortable to report misconduct internally. Anyone can make an anonymous whistle-blower report through the company website which enables reports to be made anonymously and confidentially.

- The report can be accessed by going to <http://zerellafresh.com.au/contact-us/>
- For anonymous reporting select the 'general' option which does not require names and contact details.

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- Making an anonymous whistle-blower report may affect Pye Group's ability to effectively investigate the matter, as it limits the ability to seek further information or keep the Whistle-blower updated about actions being taken.
- Pye Group will take all reasonable steps to protect the identity of an anonymous Whistle-blower reporter, noting that the subject matter and details of a report may identify the reporter even if they have chosen to make your report anonymously.

When making a report the whistle-blower should clearly outline:

- the issue or concern
- the alleged misconduct
- the individual(s) involved
- their reasons for believing that the misconduct has occurred, including when and how it occurred; and
- any further evidence that would substantiate their allegation, if known

The Whistle-blower should ensure that their report is:

- Factually accurate, noting the suspected misconduct and their own actions
- Based on first-hand knowledge
- Objectively based on reasonable grounds; and
- The whistle-blower must keep secure any relevant documents as possible evidence and not alter them.

****Personal work-related grievances are not within the scope of this Policy or the Whistle-blower channel and will be addressed through the local grievance resolution process. Personal work-related grievances relate to an employee's current or former employment and tend to have implications for them personally. Examples include:**


- An interpersonal conflict between the employee and another employee
- A concern about the behaviour of an employee
- A decision relating to an employee's engagement, transfer or promotion
- An employee's terms and conditions of employment
- Matters relating to an employee's performance or discipline - related decisions; or
- A decision relating to the termination of employment

Confidentiality and privacy protection

Pye Group commits to confidentiality and fairness in all matters raised under this Policy. Whistle-blowers will not be personally disadvantaged in their employment with Pye Group or suffer other detrimental treatment (for example, dismissal, disciplinary action, threats or other unfavourable treatment) as a result of making a report in accordance with this Policy.

If a Whistle-blower is subjected to detrimental treatment, they should raise the matter with a senior supervisor or HR immediately. Any such retaliatory action will be treated as serious misconduct and will be dealt with under Pye Group disciplinary procedures.

Pye Group will not use or disclose a Whistle-blower's identity unless:

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- it is necessary to further an investigation and the Whistle-blower consents to the disclosure, and/or
- the disclosure is required or authorised by law

Personal information may be used or disclosed where:

- it is made with the individual's express or implied consent
- it is necessary to prevent or lessen a serious threat to a person's health or safety; or
- it is necessary to protect or enforce Australia's legal rights or interests, or to defend itself against any claims.

The Whistle-blower must also maintain confidentiality and refrain from discussing the matter with anyone else. This includes informing commercial media or social media of their concern. Any person who violates this may not be offered protection.

Fair treatment of persons involved

Unless there are confidentiality or other reasons not to do so, employees who are the subject of a report of wrongdoing will be informed of the matters raised in the report at an appropriate time and will be given a chance to respond to any allegations made against them. They will also be advised of the outcome of any investigation.

False or misleading reports

Any false reports made, where the person reporting is intentionally misleading or knows the information is not true, will be considered a serious matter that could result in disciplinary action including potential termination of employment. The protections under this Policy or the applicable law in Australia will not be available for deliberate false reporting.

5. AUDITABLE RECORDS


All files and records created from an investigation will be retained securely. Unauthorised release of information to someone not involved in an investigation without your consent as a Whistle-blower will be a breach of this Policy. Disciplinary action, up to and including termination of employment may be taken under this Policy for any unauthorised release of information in breach of this Policy.

A release of the outcome of an investigation to senior managers or directors may be necessary to facilitate appropriate action being taken following the outcome of an investigation. Such release will not include the identity of the Whistle-blower, or information likely to lead to the identity of the Whistle-blower unless consent has been provided.

6. RELATED DOCUMENTS

- HR-POL-004 Code of Conduct
- HR-POL- 002 Anti-Bribery & Corruption
- HR-POL-005 Grievance Policy

7. DEFINITIONS

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Whistle-blower

An employee of Pye Group, contractor or supplier of goods and services to Pye Group, customers, associates of Pye Group or other Parties who reports wrongdoing, or suspected wrongdoing, as defined below.

Whistleblowing Complaint

A complaint which relates to wrongdoing or any improper state of affairs or circumstances at Pye Group as defined below.

Wrongdoing

Any concerns of wrongdoing should be reported in relation to Pye Group. Such conduct including but is not limited to:


- Breaches or potential breaches of legislation and regulations (including whistle-blower laws, corporations' law, theft, drug sale/use, violence or threatened violence or criminal damage against property or is otherwise considered illegal)
- An offence against any other law of the Commonwealth
- Unreasonably endangers health and safety or the environment
- Financial fraud or mismanagement detrimental to the interests of Pye Group
- Serious improper conduct
- Criminal offences by Pye Group staff including theft
- Serious breach of Pye Group's Code of Conduct or Policies
- Offering or accepting a bribe
- Fraud - a deliberate deception in order to secure personal gain, or to cause disadvantage to Pye Group
- Corruption - the improper use of influence or position and/or improper use of information obtained from Pye Group
- Sexual harassment or abuse
- Dishonest or unethical behaviour
- Conflicts of interest
- Anti-competitive behaviour
- Unauthorised use or misuse of Pye Group property, equipment or materials
- Unauthorised use of Pye Group confidential information

8. REFERENCES

To encourage whistleblowers to come forward with their concerns and protect them when they do, the *Corporations Act 2001 (Corporations Act)* gives certain people legal rights and protections as whistleblowers.

The *Public Interest Disclosure Act 2018 (SA)* makes it unlawful to treat people who make an appropriate disclosure unfairly because they are whistle-blowers.

Pye Group is committed to protecting and supporting people from victimisation who report a potential wrongdoing under this Policy.

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9. VERSION CONTROL TABLE

Date	Version No.	Issued by	Variation summary
01/06/20	1	Melanie Rogers	Original
30-11-22	2	Hari Surapaneni	Bi-Annual Review