



MILC Group Whistle blower Policy

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Section 1: Our Purpose

1.1 Our Goals & Commitment

The aim of MILC Group is to provide a first-class customer service experience to our clients whilst delivering your product or promotion on time and on budget. To achieve our aim, it is crucial that all our employees and partners understand, follow, and adhere to our corporate values. We have put guidelines and policies in place to ensure we live by these values in our day-to-day work.

Together with our values, we want to have feedback and encourage people to speak up when they see activity or behaviour that they feel is wrong or does not match our values. The goal of this policy is to provide very clear guidelines on how we approach and manage this feedback. With our whistleblowing policy, we aim to ensure:

- Every employee should have the chance to speak up anonymously when they feel we are not adhering to our corporate values. They should have a place to report misconduct, every report will be heard and acted on, and we will make improvements based on the results.
- MILC Group believes everyone should be able to make reports anonymously. We commit to protecting informant's identities and they only need to reveal themselves if they choose to.
- We will investigate every report of misconduct. At the end of the investigation, we will document the results and provide feedback when appropriate.

1.2 Our Commitment

MILC Group wants our employees to know they can provide information on any concerns they have, understand where they can report their concerns, know what happens after they make a report, and ensure they feel safe in providing a report. MILC Group also wants to let them know about their right to be anonymous as well as how we, as an organisation, will ensure they are not subject to any retaliation or other abuse because they made a report.

1.3 What Conduct Should Be Reported

It is important that MILC Group outlines what behaviour we want to be reported under this policy. We want to hear from you if you witness or know about any behaviour that is:

- Fraudulent
- Illegal
- Corrupt
- Dishonest;
- Unethical;
- Violates the law or any legal code;
- Is creating an unsafe environment;
- Breaches any of our company's policies;

- Discrimination;
- Harassment and/or bullying of any kind;
- Any conduct which is detrimental to {Insert Company Name} and could cause financial or non-financial loss;

1.4 Who Falls Under This Policy

The following would be considered an “eligible person” and would fall under MILC Group’s whistleblowing policy.

- Employees (including directors, managers, interns, and secondees).
- Contractors, consultants, service providers, suppliers, business partners.
- Former employees.

This policy applies to all MILC Group’s businesses, divisions, and offices. It also applies across all jurisdictions where we operate. If local legislation, regulation, or laws provide a higher level of protection than what is included in this policy, the local legislation will take precedence.

Section 2: Process for Making a Report

2.1 What Options Do Employees Have For Making A Report

If an employee or eligible person would like to make a report, they have different channels available where they can do this. Detailed instructions for how to use and approach each of these channels is included in Appendix 1.

1. Anonymous email to: tim@milcgroup.com.au
2. Via post: PO Box 1465, Tullamarine, VIC 3043
3. Speak with the owner of MILC Group's whistleblowing program via phone: Tim Hickey, Director, +61400030303

2.2 You Can Remain Anonymous

MILC Group respects and protects your identity if you choose to make an anonymous report. You can choose to remain anonymous while making a report, interacting with case managers during an investigation of your report, as well as after your case is closed. At any given time, you can identify yourself, but this is your choice and at no point do you need to do this or will you be forced to provide your identity.

If you decide to disclose your identity, MILC Group will work to protect your identity and will outline and document who in the organisation will know you submitted your report. MILC Group will also take all steps necessary (and outlined in this policy) to ensure you do not suffer any retaliation.

It is worth noting that MILC Group will make every endeavour possible to investigate your report, but in some cases, there are limitations of what can be achieved if the informant decides to remain anonymous.

2.3 What Is the Investigative Process?

It is important for MILC Group to be transparent with our employees and outline what is the process for us to investigate a report submitted through our whistleblowing channels. Below, we have provided the different steps a case manager or member of our whistleblowing team will go through once a report is received until the case is closed.

1. Report (anonymous or otherwise) is received.
2. A case manager is assigned to the report to assess it and confirm its receipt.
3. The case manager will do an initial assessment to confirm it is a valid report and request permission to investigate.
4. The case manager will begin their investigation. This can include corresponding with the informant if there is a channel to do this.
5. The case manager will investigate and update management and the informant per policy guidelines.
6. Once the case manager has finalised their investigation and report, management and the

informant will be updated.

7. At this point, the case manager will hand everything over to management for any subsequent action to take place.

2.4 How We Use 3rd Parties

At MILC Group, we utilise 3rd parties in our whistleblowing program and strategy. Examples of how we might utilise 3rd parties include:

1. **Accounting Firms:** Moran Accountants uses as 3rd party accounting firms to do investigating of specific reports that come through our whistleblowing program.
2. **Human Resources Consultants:** Employsure utilises as human resources consultants across our business and they might be involved in specific whistleblowing cases, ensuring we use human resource best practices as we assess, investigate, and take action.

2.5 Who is Alerted to a Report

Once a report is submitted (anonymous or not), this report goes to the director/owner of the MILC Group. This person will then assess the report and assign it to a case manager, who will manage the investigation.

Certain senior managers might be alerted to the report as part of the reporting process or if they are involved in the investigation in some manner.

Any information that could potentially identify an anonymous informant will be held in the strictest confidence and will not be shared, unless MILC Group is compelled by law.

2.6 What Is The Process Of Updating The Informant

As part of our investigative process, MILC Group will update the informant of the progress of the investigation. These updates can include the following:

1. MILC Group has confirmed the receipt of a report from the informant.
2. MILC Group has begun the investigative process.
3. The investigation is currently ongoing.
4. The investigation has been closed.

MILC Group's commitment is that the informant will be updated once a month while the investigation is ongoing. They will then be updated once the investigation has been closed.

MILC Group will strive to provide as much feedback on the investigation as possible. However, due to MILC Group's privacy guidelines, there often information that cannot be shared with the informant.

2.7 What If the Informant is not Satisfied with the Result?

If, after receiving the summarised report of the investigation, the informant is not satisfied with the result, they can escalate this to the the director/owner of the MILC Group. The informant can provide this escalation in writing so that a formal review can take place. While the director/owner commits to review the request, MILC Group is under no obligation to reopen the investigation. If the director/owner concludes that the investigation was conducted properly and no new information exists that would change the results of the investigation, the investigation will be concluded.

Section 3: How Informants Are Protected

3.1 Anonymity After Submitting a Report

Section 2.2 discussed how an eligible person can remain anonymous during the process of submitting a report. After submitting a report, the following policies around anonymity are in place to protect an informant's identity.

- The informant has the right to remain anonymous and does not need to identify themselves at any time during the investigation process.
- MILC Group uses tools and platforms that help protect an informant's identity during and after submitting a report.
- At no time will MILC Group force the informant to reveal their identity.
- The informant can refuse to answer questions they feel could identify themselves. If the informant reveals themselves at any time, you will document who will have access to their identity. This can include the case manager, whistleblowing program owner etc.

3.2 Potential Retaliation

An informant might be concerned that staff, management, or the organisation might retaliate against them. In this case, MILC Group will protect the informant from:

- Being terminated or having their employment ceased.
- Performance management.
- Harassment on the job or workplace bullying.
- Warnings or disciplinary actions.
- Discrimination.
- Any other action that can be perceived as retaliation for making a report.

3.3 Considered Risk of Retaliation

In the case of "considered risk of retaliation", the informant believes retaliation is near or imminent, and they are targeted for retaliation. In cases of considered retaliation, the informant should contact the director/owner. The director/owner will take the action they feel is appropriate as well as come up with recommendations for how the situation can be resolved. Potential steps to protect the informant from a considered risk of retaliation can include:

- The informant taking leave.
- The informant being reassigned to other duties.
- The informant being reassigned to another location.

3.4 Already Retaliated Against

If the informant feels that they have already been retaliated against, they should escalate this immediately to the director/owner. The director/owner will take the action they feel is appropriate as well as come up with recommendations for how the situation can be resolved. Potential steps to protect the informant after retaliation has occurred can include:

- The informant taking leave.
- The informant being reassigned to other duties.
- The informant being reassigned to another location.

3.5 Retaliation Not Adequately Resolved

If the informant feels their report of retaliation was not resolved adequately can escalate this case in writing. The report will need to go to the director/owner, and they will investigate the matter and process for how the retaliation was dealt with.

3.6 How MILC Group Deals with Retaliation

MILC Group does not tolerate any attempts to retaliate against an informant who has made a report. Any employee or associated person that found retaliating will face disciplinary action, including the potential to be terminated from their roles.

3.7 Separation Of Issues

MILC Group will be able to still raise any issues related to work or performance related issues. While MILC Group will protect the informant from any retaliation, it is also important that they are still effective in their job. MILC Group can still raise any performance or contract issues with the informant as long as they are kept separate and not influenced at all from any reports that have been made.

3.8 Protection & Immunity for Others

Other parties that might have to bear witness or are involved in the investigation will be protected from retaliation in the same manner as the informant.

3.9 Legislative/Regulation Protection & Assistance

If in any jurisdictions or locales where {Insert Company Name} operates has whistleblowing protection laws that provide a higher level of protection than what is included in this policy, the local legislation will take precedence.

Section 4: Our Roles & Responsibilities

4.1 Roles

The roles within MILC Group's whistleblowing program include the following:

- Program owner and whistleblowing protection officer (WPO): Director/owner
- Day-to-day manager of MILC Group 's whistleblowing program: Director-Finance
- Case managers that investigate individual reports: Director-Finance
- Human resources who are involved in cases and made aware of specific investigations: General Manager

4.2 Responsibilities

The following are the responsibilities of each role in MILC Group's whistleblowing program.

Program owner/whistleblowing protection officer: This individual owns the entire program and is measured on its overall success. This includes employees knowing and understanding the program, an easy process of making a report, investigating reports, as well as being a point of escalation for any concerns or retaliation that has taken place. While this individual reports into the organisation, the result of their work goes directly to the Director.

Day-to-day manager: The day-to-day manager views incoming anonymous reports, assigns these reports to case managers, and manages them as they conduct investigations. This person is the first line of escalation and works collaboratively with case managers to ensure anonymous reports are heard and acted upon.

Case managers: Case managers are assigned anonymous reports and their role is to investigate these reports. This includes interacting and asking questions of informants, as well as using the information provided to investigate the report submitted. Their investigation can be internal or external to the organisation depending on what was documented in the report. Their goal is to gather the facts and put forth a final report to management on what happened and what action they feel needs to take place.

Human resources: Colleagues from human resources may be called upon to provide advice and guidance during any investigation. The whistleblowing program leverages their expertise and acumen to ensure MILC Group is using HR best practices during investigations, and we are treating all employees fairly.

Section 5: Governance

5.1 Changes to MILC Group's Whistleblowing Policy

From time to time, MILC Group's whistleblowing policy will need to change to keep up with our values, best practices, improvements, as well as legislation and regulations. Any changes to our whistleblowing policy will be communicated with all employees and any relevant stakeholders. This policy and any changes made do form any contract of employment.

Any changes to MILC Group's whistleblowing policy must be approved by the:

- CEO
- Head of Compliance
- Owner of MILC Group's whistleblowing program

All changes will be reviewed by the Board of Directors and the Board can comment and provide feedback as necessary. All changes will also be documented in {Insert Company Name}'s whistleblowing policy and will be made available to all employees.

5.2 Reporting to the Director

The Director is updated every quarter on MILC Group's whistleblowing program, inclusive of reports, investigations, and results. Reports or investigations carrying an undue amount of risk will be reported to the Director outside of the quarterly updates. The Director at any time can ask about anonymous reports, investigations, as well as the state of MILC Group's whistleblowing program.

Appendix 1: Channels for Reporting

Whistleblower report form: could be downloaded from

Appendix 2: Change Log

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