



Whistleblower Policy

POL-HR-12

VERSION 1.0



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1 INTRODUCTION AND PURPOSE

Oncore Group Holdings Pty Ltd and its controlled companies (**Oncore**) is committed to the highest standards of conduct and ethical behaviour in all our business activities, and to promoting and supporting a culture of honest and ethical behaviour, corporate compliance and strong corporate governance.

Oncore encourages the reporting of any instances of suspected improper, unethical, illegal or fraudulent conduct involving Oncore.

The Corporations Act 2001 (Cth) provides protections for certain types of persons that make a disclosure of misconduct or unethical behaviour, malpractice, bribery or corruption.

The Oncore Whistleblower Policy (**Policy**) outlines the rights of all officers, directors, employees, contractors, consultants, agents, interns, volunteers and stakeholders of Oncore and its subsidiary companies to:

- report in good faith any perceived wrongdoing, impropriety, serious unethical behaviour, non-compliance with Oncore policies and procedures, legal or regulatory non-compliance or questionable accounting or audit matter; and
- expect and receive protection from any reprisal or detrimental action resulting from such disclosure.

This Policy covers the processes for dealing with disclosures or reports made by officers, directors, employees, contractors, consultants, agents, interns, volunteers and stakeholders of suspected improper conduct within Oncore, its subsidiaries and within its supply chain in a confidential and secure manner.

2 SCOPE

This Policy applies to:

- all employees of Oncore and its subsidiary companies, whether full-time, part-time, casual or contractors, at any level of seniority and wherever employed and volunteers and interns (Employees); and
- employees or principles of organisations which have a commercial relationship with Oncore as customers, suppliers, consultants, contractors, advisers, agents or otherwise.

The protections in this Policy will also apply to any person who has made a disclosure of information relating to the Employer or other stakeholders to a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to whistleblowing protection laws.

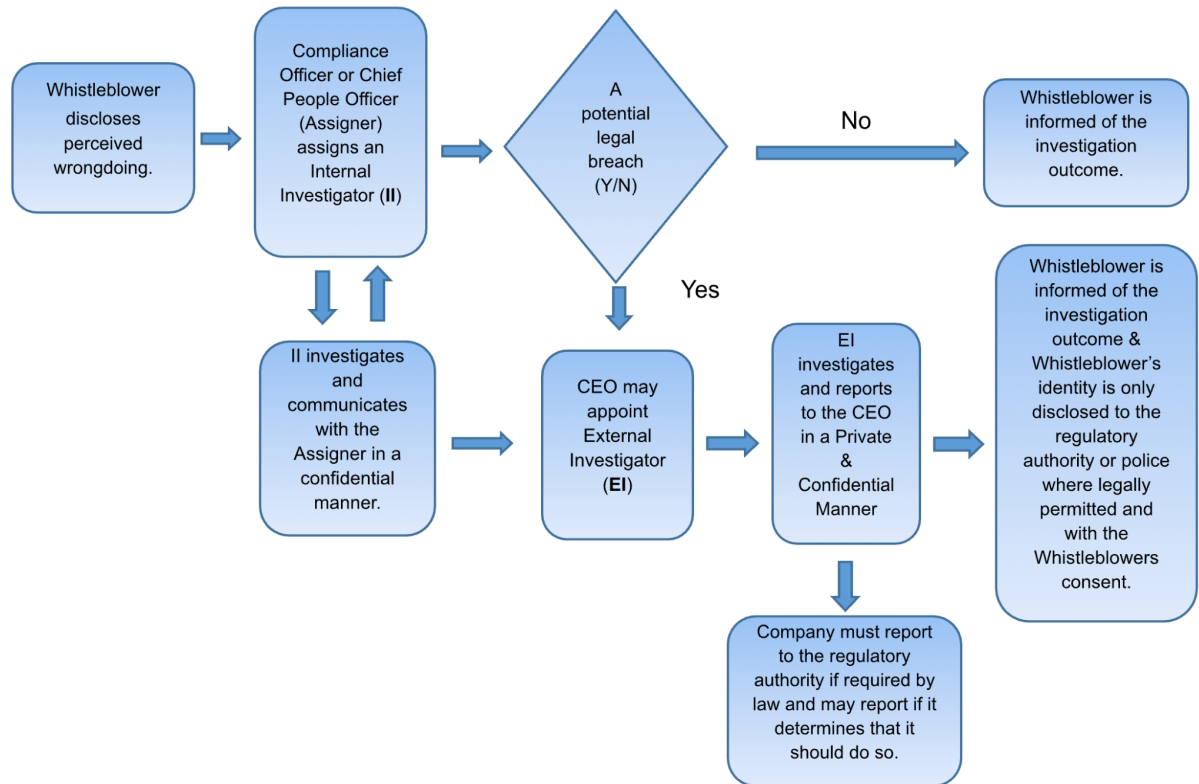
3 RESPONSIBILITY FOR POLICY COMPLIANCE AND REVIEW

Oncore's Chief Financial Officer (**CFO**) and is responsible for the overall administration of this Policy. The CFO will monitor the implementation of this Policy and will review on an ongoing basis the Policy's



suitability and effectiveness. Internal control systems and procedures will be audited regularly to ensure that they are effective in minimising the risk of non-compliance with this Policy.

4 POLICY AND PROCEDURE



5 REPORTING

Employees and stakeholders are encouraged to disclose any behaviour, practice or activity that they reasonably or genuinely believe or perceive to (**Reportable Conduct**):

- be unethical or improper;
- be dishonest or constitute financial malpractice, impropriety, corruption, theft, bribery or fraud or misappropriation of funds or assets of Oncore;
- be significant mismanagement or waste of funds or resources;
- be in breach or potentially in breach of any law or regulation;
- amount to an abuse of authority or behaviour that is oppressive, discriminatory or grossly negligent;
- amount to non-disclosure or manipulation of the internal or external audit process or other improper or misleading accounting or financial reporting practices;
- be unsafe work practices;
- be serious harm to the public health, safety or environment or the health and safety of Employees or other stakeholders of Oncore;
- be a serious breach of the Oncore's Policies or Code of Conduct;
- be any other conduct which may cause loss or damage to Oncore or otherwise which may be detrimental to Oncore's reputation or interest; or



- be any action taken against, or harm suffered by an Employee or other stakeholder of Oncore as a result of making a report of Reportable Conduct.

If an Employee or other stakeholder becomes aware of any Reportable Conduct, the Employee and other stakeholder (Whistleblower) should report or disclose the Reportable Conduct to their immediate Manager. Where this is not appropriate or where the Whistleblower do not feel comfortable in doing so, or where previously no action has been taken, Whistleblowers should report the Reportable Conduct to Oncore's Compliance Officer or Chief People Officer, either:

1. by email or
2. in person

Whistleblowing is not about airing personal grievances. It's about reporting real or perceived malpractice. In reporting or disclosing Reportable Conduct under this Policy, Whistleblowers must act in good faith on a genuine belief that there has been wrongdoing, and not for any malicious purpose. Where it is determined that a disclosure is made by a person falsely or for a malicious purpose, Oncore reserves the right to take disciplinary action against the disclosing person, including summary dismissal.

Personal work-related grievances regarding matters such as an interpersonal conflict with the Whistleblower and another employee or a business decision relating to an engagement, transfer, promotion, terms and conditions, suspension or termination of the Whistleblower's employment typically fall outside this Policy and should be raised in accordance with the relevant grievance policy that applies. An exception to this is where a personal work-related grievance is related to detrimental treatment taken against the Whistleblower because the Whistleblower has made (or is suspected of making) a disclosure under this Policy, or because the Whistleblower proposes to (or could) make a disclosure under this Policy.

6 VICTIMISATION

Victimisation occurs when a Whistleblower who has made a complaint in good faith suffers a negative consequence from Oncore or any person on behalf of Oncore as a result of raising or reporting Reportable Conduct. It may also be referred to as 'detrimental action'.

A Whistleblower, witness, individual providing information, or support person will not be disadvantaged or penalised in their role with Oncore for making a complaint (where the complaint has been made in good faith) or being involved in an investigation.

Examples of victimisation or detrimental action include:

- ostracising, demoting or dismissing a person;
- alteration of an employee's position or duties to their disadvantage;
- discrimination;
- harassment or intimidation of a Whistleblower or witness; or
- damage to a Whistleblower's or witness' property, reputation, business or financial position.



Victimisation/detrimental action may be regarded as serious misconduct and will be treated in line with the Disciplinary Policy and it may result in disciplinary action up to and including termination of employment. Retaliatory conduct may also attract civil or criminal liability.

7 INVESTIGATING REPORTABLE CONDUCT

Upon receiving a report, the relevant Manager, Compliance Officer or Chief People Officer (as the case may be) will:

- acknowledge receipt of the report; and
- determine if the report relates to Reportable Conduct and, if so, the report will be investigated as appropriate.

The investigation may be conducted internally or via an externally appointed investigator.

The particular investigation process and enquiries will be determined by the nature and substance of the report. All investigations will be carried out as quickly as is practicable.

All investigations will be conducted in an objective and fair manner and in accordance with the principles of natural justice and will be reasonable and appropriate having regard to the nature of the Reportable Conduct and the circumstances.

All Employees or other stakeholders are required to fully cooperate with the investigator. A failure or refusal to fully cooperate will constitute misconduct and may result in disciplinary action up to and including dismissal.

Where a Whistleblower wishes to remain anonymous, the Whistleblower's identity will not be disclosed to the investigator or to any other person. Information that is likely to lead to the identification of the Whistleblower can be disclosed without the Whistleblower's consent, provided that:

- the disclosure of the confidential information is reasonably necessary for the purposes of investigating the conduct disclosed by the Whistleblower; and
- all reasonable steps are taken to reduce the risk that the Whistleblower will be identified.

Where appropriate, the relevant Manager or appointed investigator will provide feedback to the Whistleblower regarding the investigation's progress and/or outcome. This will be subject to privacy and confidentiality considerations.

8 INTERNAL INVESTIGATION

All investigations will be conducted internally. In appropriate circumstances, a complaint or report of Reportable Conduct may be referred by the CEO or Chief People Officer to an external investigator, including our legal advisers, to investigate.

The internal investigator is required to:

- act impartially and document the disclosure;
- conduct all interviews; and



- report on the results of the investigation and any recommendations.

All serious disclosures and progress of any investigation will be drawn to the attention of the CEO, maintaining confidentiality at all times. If the disclosure is the subject of an internal investigation which reveals genuine issues to be addressed by Oncore, the CEO will instruct management to take remedial action.

9 AFTER A DISCLOSURE IS MADE

All reasonable steps will be taken to protect a Whistleblower's identity following a report of any matter that is considered Reportable Conduct.

Information about a Whistleblower's identity and information that is likely to lead to the identification of the Whistleblower may be disclosed in the following circumstances:

- where the information is disclosed to ASIC, APRA or the Australian Federal Police;
- where the information is disclosed to a legal practitioner for the purpose of obtaining legal advice in relation to the operation of applicable whistleblowing protection laws; or
- where the Whistleblower's consents.

All information, files and records that form part of an investigation into Reportable Conduct will be retained securely.

The Whistleblower may be informed of the outcome at the conclusion of the investigation, subject to privacy and confidentiality considerations. All Whistleblower's must maintain confidentiality and not disclose details of the report to any person.

Oncore will act in the best interests of a disclosure to protect them from any victimisation, adverse reaction or intimidation, and commits to ensure confidentiality (to the extent permitted by law) and fairness in all matters raised under this Policy. Whistleblowers are encouraged to report any incidents of victimisation to the investigator.