

Whistleblower Policy

1. Overview

Pure Environmental (Pure) is committed to maintaining high standards including a culture of ethical conduct, behaviour and compliance. The purpose of this Whistleblower Policy is to encourage employees and stakeholders to report any suspected instances of unethical, illegal, corrupt, fraudulent or undesirable conduct without fear of retaliation.

2. Scope

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

- Employee.
- Officer.
- Director.
- Contractor (including sub-contractors and employees of contractors).
- Supplier (including employees of suppliers).
- Consultant.
- Auditor.
- Relative, dependant, spouse, or dependant of a spouse of any of the above.

This policy will be available to Pure employees and stakeholders on Pure's intranet and website.

3. What is "Reportable Conduct"?

A report or disclosure can be made under this policy if you have reasonable grounds to believe that one of the above persons has engaged in conduct which is:

- Dishonest, fraudulent or corrupt.
- Illegal (such as theft, dealing in or use of illicit drugs, violence or threatened violence, criminal damage to property, breach of competition and consumer law, breach of privacy law, or other breach of state or federal law).
- Unethical including any breach of Pure's policies.
- Potentially damaging to the Company, its employees or a third party (such as unsafe work practices, environmental damage, health risks or abuse of property or resources).
- Abuse of authority or a conflict of interest (such as making a decision which has personal benefit above Pure or inappropriately mixing personal and business relationships).
- Risk of a financial loss to Pure or damage its reputation.
- Harassment, discrimination, victimisation or bullying.

Reportable Conduct does not include disclosures related to an employee's individual employment or former employment (unless detailed above). These personal work-related grievances should be reported to your manager for investigation.

Examples of personal work-related grievances, not covered by this policy include:

- An interpersonal conflict between the staff member and another employee.
- A decision relating to the engagement, transfer or promotion of the employee.

- A decision relating to the terms and conditions of engagement of the employee.
- A decision to suspend or terminate the engagement of the employee, or related to discipline of the employee.

4. How do I make a report?

Pure has a number of methods for making a report.

a. Whistleblower Officer

The General Manager Services will act as the Whistleblower Officer to receive and address written whistleblower reports.

Rachel Irvine-Marshall

Email: whistleblower@purenv.au

Phone: 0477 228 916

General Manager Services

b. Anonymous Reporting

Anonymous reports can also be made using one of the following methods:

- Using the QR code on the intranet or posters at your workplace and completing the form.
- Posted to 26 Hurrell Way, Rockingham WA 6168 (marked Private & Confidential and to the attention of Rachel Irvine-Marshall, General Manager Services).

5. Investigation Process

Pure will investigate Reportable Conduct as soon as practicable after reporting. The investigation will be completed in a thorough, objective and fair manner. The investigation process will be determined by the nature and substance of the report.

If the report is not anonymous, you will be contacted to discuss the investigation process and any other relevant matters. Where a report is anonymous, the investigation will be completed based on the information provided.

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. Any report will remain the property of Pure and will not be shared with you or any person against whom the allegations have been made.

6. Protection of the Whistlerblower

a. Protection against Detrimental Conduct

Pure prohibits and will take reasonable steps to protect individuals from any form of detrimental conduct after disclosing concerns or participating in investigations. This includes termination, demotion, harassment, discrimination, disciplinary action, alteration of position or duties, bias, threats or other unfavourable treatment connected with making a report.

Any detrimental conduct must be immediately reported to the Whistleblower Officer for investigation.

b. Protection of whistleblower identify and confidentiality

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

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 purpose of obtaining legal advice) or
- The concern is reported to the Australian Securities and Investments Commission (ASIC), the Australian Prudential Regulation Authority (APRA), the Australian Taxation Office (ATO) or the Australian Federal Police (AFP).

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.

If you consent for your identify (or any information which would likely to identify you) to be shared, we will advise you who this information will be shared with and for what purpose prior to the disclosure.

a. Protection files and records

All files and records created from an investigation will be retained securely. The unauthorised release of information to someone not involved in the investigation, other than Senior Managers or Directors who need to know to take appropriate actions, without your consent as a whistleblower, will be a breach of this policy.

7. Support Available

Any person who makes a disclosure under this policy or is implicated as a result of a disclosure may access Pure's Employee Assistance Program, which is a free and confidential counselling service.

Where appropriate, Pure may also appoint an independent support persons to deal with any ongoing concerns you may have.