

# Whistleblower Policy

## Scope

This policy applies to all employees of Thiess Group Holdings and the entities it controls (the **Group**), third parties, and their employees whilst working at a Group workplace and alliances and joint ventures in all jurisdictions.

## Purpose

This policy sets out how the Group manages whistleblower disclosures. It forms part of the Group's whistleblowing management system and is to be read in conjunction with the [Group Complaints and Investigation Standard \(Standard\)](#). The Policy is available to all officers and employees via the Thiess intranet and Thiess Governance System.

The objectives of this Policy are to provide clarity on how we support Whistleblowers so they:

- know how to raise concerns and are aware of their rights and obligations, including the right to remain anonymous; and
- feel safe in speaking up and raising concerns, free from detriment, retaliation or victimisation.

The Group is committed to complying with applicable laws for protection of Whistleblowers.

## Policy

### 1. Who is a Whistleblower?

For the purpose of this Policy, a **Whistleblower** is a current or former:

- director, manager, officer or employee; or
- contractor, consultant, supplier, service provider or associate (or their employees or subcontractors); or
- any relative, dependent or spouse of any individual referred to above of the Group who makes or attempts to make a disclosure, on reasonable grounds, about:
  - conduct that is contrary to the Code of Conduct or Respectful Workplace Standard;
  - an improper state of affairs, including breaches of any laws including corporations laws, financial laws and criminal laws; or
  - conduct that represents a danger to the public or financial system.

Personal work-related grievances may not be protected by this Policy.

### 2. Making a Disclosure

The Policy applies where the **Whistleblower** makes the disclosure to an **Eligible Recipient**.

An Eligible Recipient includes:

- a person authorised by the Group to receive disclosures;
- an officer, senior manager, auditor or actuary of the Group; and
- the Thiess confidential third-party whistleblowing service (**Ethics Line**).

A disclosure may also be protected if the disclosure is:

- made to certain regulators, such as police, relevant government authority or legal practitioners; or
- if it is a 'public interest disclosure' or 'emergency disclosure' made to journalists or parliamentarians, in certain circumstances where previous disclosure has been made to prescribed government bodies. Whistleblowers should contact an independent legal adviser before making a 'public interest disclosure' or an 'emergency disclosure'.

### 3. Confidentiality, Anonymity and Personal Information

The identity of the Whistleblower (or information disclosed that could lead to their identification), will be treated strictly confidentially and will not be shared unless:

- the Whistleblower has provided prior consent (in writing wherever possible or required); or
- the Group are compelled by law or certain government authorities to do so; or
- we consider it appropriate to make a disclosure to a regulator under legislation.

We will comply with all requests for anonymity (subject to legal requirements) and make best endeavours to investigate the disclosure. Factual circumstances or personal characteristics can sometimes reveal the identity of a whistleblower despite best efforts of those investigating a report to keep the identity of the whistleblower confidential. There may also be practical limitations on what can be investigated if a Whistleblower does not agree to share their disclosure or identity.

A whistleblower who wishes to remain anonymous may wish to adopt a pseudonym for the purpose of the disclosure. They can also refuse to answer questions they feel could reveal their identity at any time, including during the course of an investigation or a follow-up conversation.

Thiess will collect, use, store, transfer and process a whistleblower's personal data in accordance with the Thiess Privacy Policy and any other relevant policies and procedures relating to data protection in place from time to time.

### 4. Investigation

Whistleblower disclosures will be referred to the Business Conduct Representative of Thiess to perform a preliminary review of the allegations raised and commission an appropriate investigation.

All investigations will be conducted in accordance with the procedures set out in the [Group Complaints and Investigation Standard](#) ensuring that the discloser will be kept informed, their details will be kept confidential and investigations will be documented, and the outcome may be communicated to the discloser.

### 5. Workplace Protection Officer (WPO)

The Business Conduct Representative must inform the Workplace Protection Officer (WPO) of the matter. The WPO is responsible for safeguarding the interests of the Whistleblower by:

- protecting the Whistleblower from retaliation;
- maintaining the confidentiality of the Whistleblower; and
- reviewing and considering any complaints of retaliation or any concerns that the disclosure has not been dealt with in accordance with the policy.

### 6. How are Whistleblowers protected?

Whistleblowers have statutory protections in addition to the protections provided by the Group under this Policy. The protections may include identity protection, protection from detrimental acts or omissions, compensation and remedies and liability protections.

The Group will ensure fair treatment of Whistleblowers and does not condone any form of reprisal (disciplinary or retaliatory) being taken against anyone for raising or helping to address a concern. The Group will take all reasonable steps to protect Whistleblowers from such retaliation or victimisation.

The Group will act to prevent Whistleblowers from being personally disadvantaged as a result of reporting. Examples of disadvantage include dismissal, demotion, harassment, discrimination, interference with their role or bias.

Whistleblowers who feel they have been disadvantaged as result of reporting should approach the WPO.

Any person who participates in any reprisal against a Whistleblower will be subject to disciplinary action, which may result in termination of employment or reference to an external authority.

The Group retains the right to manage personal work-related grievances with a Whistleblower. These are matters that arise in the ordinary course of their employment or engagement (i.e. a separate or unrelated performance or misconduct issue).

## 7. False Reporting

While whistleblowers who raise concerns in accordance with this Policy will have the benefit of the protections in this Policy, deliberate false reporting will not be tolerated and any person found to have made a deliberate false report will be subject to disciplinary action.

## 8. Workplace Protection Officer Contact Details

Whistleblowers who feel they have been disadvantaged as a result of reporting should approach the Workplace Protection Officer (Shameelta Pratap, Group Executive Transformation, People and Communication, spratap@thiess.com.au).

Key contacts can also be found on the Thiess Intranet home page, under 'Code of Conduct and Ethics Line'.

## 9. Ethics Line

The Ethics Line is administered by an external provider to provide an independent and safe avenue for reporting 24 hours, 7 days per week.

The Ethics Line can be contacted by email at [makeareport@stopleveline.com.au](mailto:makeareport@stopleveline.com.au) and by phone as follows:

<b>Australia</b> (1300 THIESS) (Free call)	<b>Indonesia</b> 0800 1 844 377 (Free call)	<b>USA</b> +1 970 486 1122 (Free call)
<b>Chile</b> +56 232 201 012 (Free call)	<b>Mongolia</b> +61 2 5500 7307 (Free call)	<b>India</b> +61 2 5500 7307 (Free call)

All Group employees can also contact the Ethics Line via Online Disclosure Form, Post, Fax or App – STOP247. For details please visit <https://thiess.stoplevelinereport.com/>

## Policy Information

<b>Owner:</b>	General Counsel and Company Secretary, Thiess
<b>Approved by:</b>	Thiess Group Holdings Board and Executive Chair & CEO, Thiess
<b>Effective Date:</b>	4 December 2023

Note: Thiess Group Policies may be amended from time to time with approval from the Thiess Group Holdings Board.