

Slattery Grays Auction Group Summary of Whistleblower Policy

1 Introduction

- 1.1 This is a summary version of the whistleblower policy (Policy) of Slattery Grays Auction Group (SGAG). A full version of this Policy can be provided upon request. Requests should be sent to whistleblowing@slatterygrays.com.au, which will be monitored by the Whistleblower Protection Officer.

2 Who can make a report under this policy?

- 2.1 The following stakeholders are eligible to make reports under this Policy and are eligible whistleblowers:
- (a) A current or former employee, volunteer or officer of SGAG.
 - (b) A supplier of services or goods to SGAG (whether paid or unpaid), and including their employees and contractors (for example, current and former contractors, consultants, service providers and business partners).
 - (c) An Associate of SGAG which includes:
 - (i) someone SGAG is acting jointly with, such as (potentially) a joint venture party;
 - (ii) someone who SGAG, or its directors, are accustomed to or under an obligation to act in accordance with the directions of;
 - (iii) a trustee of a trust under which there is a benefit to SGAG.
 - (d) A relative, dependent or spouse of an individual described above (for example, relatives, dependents or spouses of current and former employees, contractors, consultants, service providers, suppliers and business partners).

3 What can be reported under this policy?

- 3.1 Information that an individual has received and which the individual has reasonable grounds to suspect concerns misconduct or an improper state of affairs or circumstances in relation to SGAG.
- 3.2 Examples may include:
- (a) Corrupt activities
 - (b) Theft, fraud or misappropriation
 - (c) Significant mismanagement or waste of funds or resources
 - (d) Abuse of authority
 - (e) Action that causes serious harm to clients, public health, safety, the environment or the health and safety of any Slattery Grays employee
 - (f) Action taken against or harm suffered by an employee or volunteer as a result of making a report under this policy
 - (g) An offence against, or contravention of, a provision of any of the legislation identified in the Corporations Act 2001 (Cth) (and any instrument made under that legislation)
 - (h) Any other conduct specified in the full version of this Policy

4 How to make a report under this policy

- 4.1 When reporting disclosable matters either internally or externally, whistleblowers are able to make an anonymous disclosure and still be entitled to the protections set out in this Policy and under the relevant legislation if the other requirements for making the disclosure are complied with.
- 4.2 Whistleblowers are encouraged to report misconduct to any of the following persons:
- (a) Directors or senior managers of the company who:
 - (i) make, or participate in making, decisions that affect the whole, or a substantial part of the business of the company; or
 - (ii) have the capacity to affect significantly the company's financial standing.
 - (b) If applicable, SGAG's auditor or a member of the audit team.
 - (c) Any Eligible Recipients listed in Annexure A of the full Policy
 - (d) Slattery Grays independent whistleblower hotline service using the following contact details:
 - (i) Telephone: 1300 30 45 50 (Australia Only)
 - (ii) Email: makeareport@stopline.com.au
 - (iii) Online: <https://makeareport.stopline.com.au/portal/landing/slatterygrays>
 - (iv) Mail: Slattery Grays Auction Group, c/o Stopline Pty Ltd, PO Box 403, Diamond Creek VIC 3089
 - (e) Any other person or service authorised by SGAG to receive disclosures that may qualify for protection.
 - (f) SGAG's Whistleblower Protection Officer: Email: whistleblowing@slatterygrays.com.au
- 4.3 Please be aware certain conditions apply to both public interest and emergency disclosures and are specified in the full version of this Policy.

5 Protections and support available to whistleblowers

5.1 Protecting confidentiality

- (a) SGAG has an obligation to keep the identity of all eligible whistleblowers confidential in accordance with the relevant legislation. This includes confidential information which could lead to the disclosure of your identity.
- (b) There are exceptions which are set out in the full version of this Policy.

5.2 General protections

- (a) Whistleblowers who make a Disclosable Matter (as defined in the full Policy) will not be subject to civil liability (e.g. breaching a duty of confidence), criminal liability (e.g. prosecution for unlawfully releasing information) or administrative liability (e.g. disciplinary action) for making the disclosure. No contractual or other remedy may be enforced against them on the basis of their disclosure.
- (b) It is an offence to cause detriment to someone as a result of them making a disclosure. SGAG will not tolerate any detriment caused or threatened to be caused against any persons who is believed to have made, a report regarding a Disclosable Matter.
- (c) SGAG will support Whistleblowers including by the following (to the extent possible whilst still ensuring the Whistleblower's identity is protected):
 - (i) providing support services,

- (ii) developing strategies to help a Whistleblower minimise and manage stress, time or performance impacts, or other challenges resulting from the disclosure or its investigation,
 - (iii) taking action to protect a Whistleblower from risk of detriment,
 - (iv) implementing processes for ensuring Management are aware of their responsibilities.
- (d) SGAG ensures that there are measures in place to ensure fair treatment of individuals that are mentioned in a report of a Disclosable Matter. These measures are outlined in the full Policy.