

 <p>Whistleblower Policy</p>	ISSUED BY:	People Department
	APPROVED BY:	Chief People Officer
	POLICY TYPE:	People and Culture
	LAST UPDATED: REVIEW DATE:	October 2019 October 2021

1 Purpose

Whistleblowers are those who sound the alert on danger, malpractice, bribery or corruption or other illegal conduct.

The Oncore Group Holdings Pty Ltd (Oncore) Whistleblower Policy (the “Policy”) outlines the rights of all employees and stakeholders of Oncore and its subsidiary companies to:

- report in good faith any perceived wrong doing, impropriety, serious unethical behaviour, 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 made by employees and stakeholders of suspected improper conduct within Oncore in a confidential and secure manner.

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.

2 Scope

This Policy applies to:

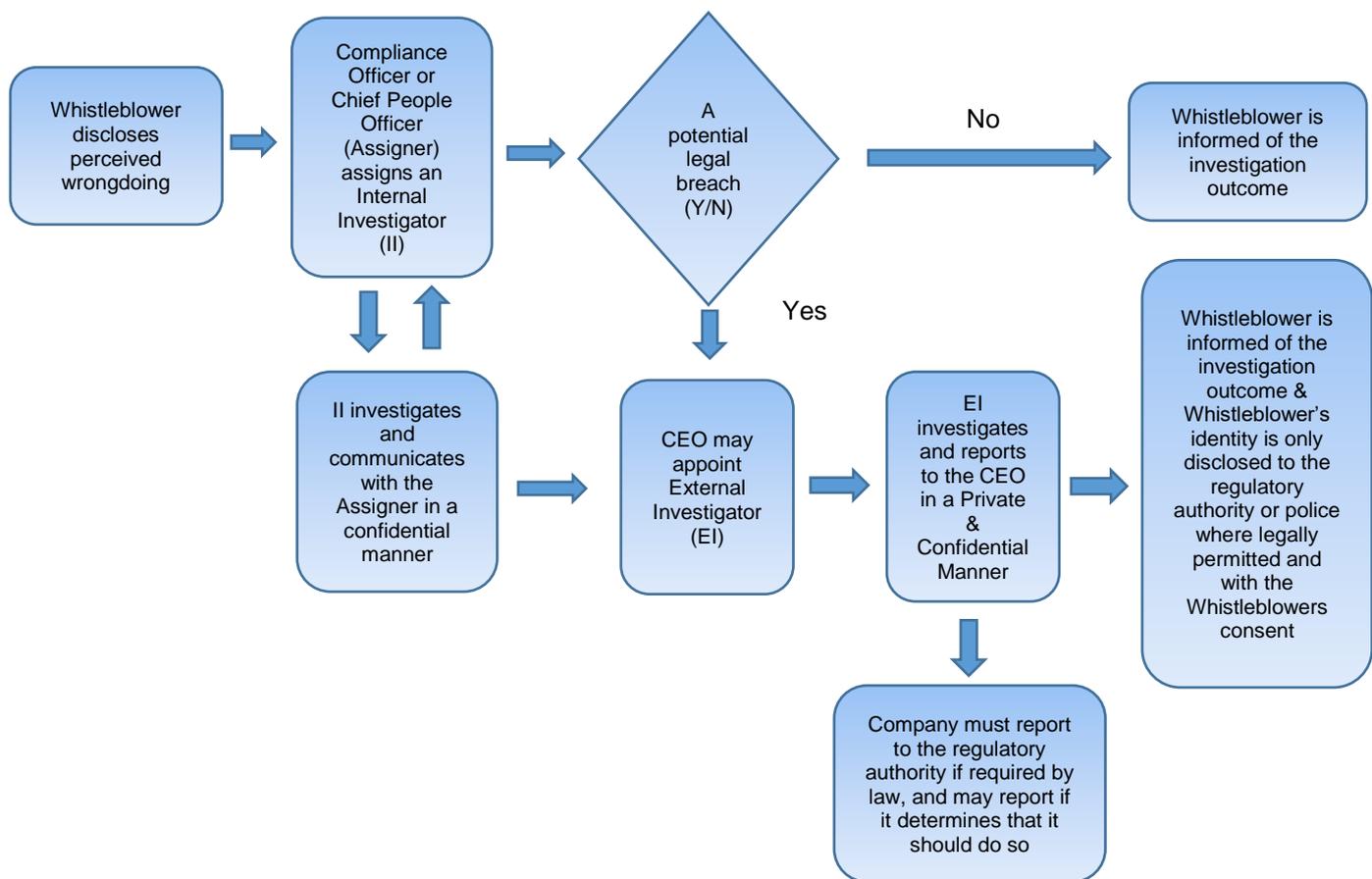
- all employees of Oncore, whether full-time, part-time, casual or contractors, at any level of seniority and wherever employed; and
- employees or principals of organisations which have a commercial relationship with Oncore as customers, suppliers, consultants, advisers, agents or otherwise.

3 Responsibility for Policy Compliance and Review

Oncore’s Company Secretary is the 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

A high-level overview of the process:



5 Reporting

Employees and stakeholders are encouraged to disclose any behaviour, practice or activity that they reasonably believe or perceive to:

- be unethical or improper;
- constitute financial malpractice, impropriety, corruption, bribery or fraud;
- be in breach or potentially in breach of any law or regulation;
- amount to an abuse of authority;
- amount to non-disclosure or manipulation of the internal or external audit process; or
- be a serious breach of the Oncore's Policies or Code of Conduct.

A disclosure can be made:

1. By email: complianceofficer@oncoreservices.com
2. In person to either the Compliance Officer or Chief People Officer

In making a disclosure under this Policy, employees and stakeholders 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 an employee falsely or for a malicious purpose, Oncore reserves the right to take disciplinary action against the disclosing employee.

Employees and stakeholders disclosing wrongdoing will be protected and the investigation will be conducted in accordance with the principles of fairness and natural justice.

6 Internal Investigation

Whistleblower disclosures made under this Policy will be documented and investigated promptly, initially by an internal investigator.

Disclosures which are personal work-related grievances will be investigated by the Chief People Officer.

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 investigations will be carried out as quickly as is practicable.

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.

7 External Investigation

If an internal investigator determines that there is an activity or conduct within Oncore which is potentially illegal, the CEO may decide to engage an external investigator.

In this event:

- a) The discloser will be afforded appropriate protection and Oncore, to the extent it can do so and is legally permitted, keep in confidence the identity of the discloser.
- b) The matter may be reported to the relevant regulatory authority or police agency.
- c) The identity of the disclosing employee or stakeholder will only be disclosed to the relevant regulatory or police agency on the basis that, where legally permitted, the employee or stakeholder's identity will be kept confidential.
- d) Disclosure of the identity of the disclosing employee or stakeholder to any other organisation or person will require the consent of the disclosing person.
- e) The internal investigator will also ensure that the matter is reported to the CEO.

8 After a disclosure is made

The discloser will always be informed of the outcome at the conclusion of the investigation.

Oncore will not tolerate any reprisals against employees or stakeholders who have made a disclosure of any matter under this Policy where the discloser has acted in good faith and on a genuine belief or perception of wrongdoing, and on reasonable grounds. Oncore will act in the best interests of a discloser 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.
