


BGFC.HR.PL.09	WHISTLEBLOWER POLICY		
Prepared By	GM Corporate Services	Version	1
CEO/SET Approved	November 2019	Review Date	Dec 2020
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WHISTLEBLOWER POLICY

Purpose

Beston Global Food Company (BFC) is committed to the highest standards of conduct and ethical behaviour in all of our business activities, and to promoting and supporting a culture of honest and ethical behaviour, corporate compliance and good corporate governance.

BFC encourages the reporting of any instances of suspected unethical, illegal, fraudulent or undesirable conduct involving BFC, and will ensure that those persons who make a report shall do so without fear of intimidation, disadvantage or reprisal.

Scope and Application

This Policy applies to all:

- Current and former directors
- Current and former employees, contractors and temporary staff
- Current and former service providers (e.g. auditors, accountants, brokers and consultants) and suppliers
- Employees of current and former service providers/suppliers
- An associate, family member, or dependent of any person in the above groups of people may also speak up. If they do choose to speak up, we will extend the relevant rights and protections under this policy.


Please note, this policy DOES NOT apply to customer complaints.

What Is Reportable Conduct?

You may make a report under this Policy if you believe that a BFC director, officer, employee, contractor, supplier or other person who has business dealings with BFC has engaged in conduct (Reportable Conduct) which:

- is dishonest, fraudulent or corrupt activity, including bribery or other activity in breach of BFC’s Company Policies;
- is illegal activity (such as theft, drug sale or use, violence, harassment or intimidation, criminal damage to property or other breaches of State or Federal law);
- is unethical or in breach of BFC Policies (such as dishonestly altering company records or data, adopting questionable accounting practices or wilfully breaching BFC’s policies or procedures);
- is potentially damaging to BFC, a BFC employee or a third party, such as unsafe work practices, environmental damage, health risks or abuse of BFC’s property or resources;
- amounts to an abuse of authority;
- a serious mismanagement of BFC’s resources;
- may cause financial loss to BFC or damage its reputation or be otherwise detrimental to BFC’s interests; or
- involves any other kind of serious impropriety.

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Reporting Channels

BFC has several channels for making a report if a person becomes aware of any issue or behaviour which they consider to be Reportable Conduct:

Current BFC employees or contractors may raise the matter with a BFC Senior Manager. The Manager in receipt of a report must take the matter to the Protected Disclosure Officer, in accordance with the protocols regarding confidentiality set out in this policy. A current (or former) BFC employee or contractor may also report directly to the Protected Disclosure Officer:

Mr. Richard Willson
 Company Secretary
 Beston Global Food Company Limited
 Level 9, 420 King William Street
 Adelaide, South Australia 5000
 Phone: 0411 411 485
 Email: rwillson@bestonglobalfoods.com.au

What Information Do I Need to Provide in My Report?

For a report to be investigated, it must contain enough information to form a reasonable basis for investigation. It is important therefore that you provide as much information as possible. This includes any known details about the events underlying the report including:

- date
- time
- location
- name of person(s) involved
- possible witnesses to the events
- evidence of the events (e.g. documents, emails)
- In your report, include any steps you may have already taken to report the matter elsewhere or to resolve the concern.


A report may be submitted anonymously if you do not wish to disclose your identity to the Protected Disclosure Officer.

BFC’s Investigation of Reportable Conduct

We investigate and record all concerns confidentially, fairly and objectively. An Investigator will be assigned to conduct the investigation. The Investigator is a senior staff member, who is not implicated directly or indirectly in the report. The investigator will provide regular updates to the person reporting the concern, where possible.

The investigation process will vary depending on the nature of the reportable conduct and the amount of information provided.

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Protection of Whistleblowers

BFC is committed to ensuring confidentiality in respect of all matters raised under this policy, and that those who make a report in good faith are treated fairly and do not suffer any disadvantage.

(a) Protection of your identity and confidentiality

Subject to compliance with legal requirements, upon receiving a report under this Policy, BFC will not, nor will any Supervisor, Manager or Protected Disclosure Officer, disclose any particulars that would suggest or reveal your identity as a Whistleblower, without first obtaining your consent.

Any disclosure that you consent to will be disclosed on a strictly confidential basis. However, the Protected Disclosure Officer is able to disclose the complaint without your consent to the Australian Securities and Investments Commission (ASIC), the Australian Prudential Regulation Authority (APRA) or the Australian Federal Police.

(b) Protection of files and records

All files and records created from an investigation will be retained under strict security and unauthorised release of information to someone not involved in the investigation (other than Senior Managers or Directors who need to know to take appropriate action, or for corporate governance purposes) without your consent as a Whistleblower will be a breach of this Policy.

Whistleblowers are assured that a release of information in breach of this policy will be regarded as a serious matter and will be dealt with under BFC’s disciplinary Policy/procedures.

Similarly, Whistleblowers must themselves not provide any files or records or other information to any party, either within the Company (other than on a “need to know” basis as above) or outside of the Company. A breach of this policy by a Whistleblower will be regarded as a serious matter and will be dealt with under BFC disciplinary procedures.

(c) Fairness

A BFC employee or contractor who is subjected to detrimental treatment as a result of making a report in good faith under this policy should inform a Senior Manager immediately. If the matter is not remedied, it should be raised with the Protected Disclosure Officer.

Detrimental treatment includes dismissal, demotion, harassment, discrimination, disciplinary action, bias, threats or other unfavourable treatment connected with making a report. Any employee or contractor found to be victimising or disadvantaging someone for making a disclosure under this Policy will be disciplined, up to and including dismissal.

Protection is not available where the disclosure is:

- Trivial or vexatious in nature with no substance. This will be treated in the same manner as a false report and may itself constitute wrongdoing.

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- Unsubstantiated allegations which are found to have been made maliciously, or knowingly to be false. These will be viewed seriously and may be subject to disciplinary action, up to and including dismissal.
- Used to victimise or purposely disadvantage another person in the Company.

Protection of the Subject of the Report

BFC recognises that individuals against whom a report is made must also be supported during the handling and investigation of the wrongdoing report, and takes reasonable steps to treat fairly any person who is the subject of a report.

BFC will take reasonable action to ensure that the person who is the subject of the allegations is treated fairly and that procedural fairness is applied. Once an investigation has commenced, the person who is the subject of the allegations should be informed that an investigation has commenced and have the opportunity to respond to any allegations made.

Duties of Employees in Relation to Reportable Conduct

It is expected that employees of BFC who become aware of known, suspected, or potential cases of Reportable Conduct will make a report under this policy or under other applicable policies.

Reporting Procedures

Protected Disclosure Officers will report to the Board on the number and type of Whistleblower incident reports annually, to enable BFC to address any issues. These reports will be made on a ‘no names’ basis, maintaining the confidentiality of matters raised under this policy.

This Policy can be located on the Group Drive under Company Policies and Forms

Issue	Date	Description of Change
1	July 2019	First draft