

# **NORTHLINE**

Australia's Global Logistics People

## Group Whistleblower Policy

Version:	2
Document number:	017.18.004P_LAY.docx
Policy manager:	Peter Burrows, General Manager, Finance
Last updated:	6 February 2020
Review date:	1 July 2020

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## 1. Background and purpose

- 1.1 This policy is issued by the Northline group of companies and their *related bodies corporate*. Each entity is responsible for the implementation and administration of this policy, to the extent that a disclosure involves that entity.
- 1.2 Northline is committed to maintaining a culture of legal compliance, integrity and good corporate governance. As part of its risk management framework, Northline welcomes the appropriate disclosure of any *disclosable matter*. Northline believes that all *disclosable matters* should be disclosed within a safe, confidential and supportive environment, and that all such *disclosable matters* should be properly handled.
- 1.3 The purpose of this policy is to:
- (a) help deter any unlawful or improper practices by Northline, its officers, employees and suppliers;
  - (b) provide all persons who wish to disclose a *disclosable matter* with information on:
    - (i) how to make a disclosure; and
    - (ii) how Northline will handle disclosures;
  - (c) ensure all persons who wish to disclose a *disclosable matter* are able to do so within a safe, confidential and supportive environment;
  - (d) ensure all disclosed matters are dealt with appropriately, transparently, and in a timely manner; and
  - (e) afford procedural fairness to anyone who is involved in a *disclosable matter*.
- 1.4 In addition to the above, this policy highlights protections which are available to whistleblowers under the *Corporations Act 2001 (Cth)*, and three qualifying conditions which are to be satisfied before such protections are available.
- 1.5 Protections are also available to whistleblowers under the *Taxation Administration Act 1953 (Cth)*; however, it is beyond the scope of this policy to describe in detail what these protections are, and when these protections are available.
- 1.6 Words in italics are defined in paragraph 11.

## 2. Who this policy applies to

- 2.1 Any individual is welcome to disclose a *disclosable matter*. This policy applies to all such disclosures. However, only *eligible whistleblowers* qualify for protections which are available to whistleblowers under the *Corporations Act 2001 (Cth)*. This is the first of the three qualifying conditions referred to in paragraph 1.4.
- 2.2 You are an *eligible whistleblower* if you fit any of the following descriptions:
- (a) current and former employees (including casuals, interns and secondees) and officers of Northline;
  - (b) current and former Northline suppliers who are individuals, and employees of such suppliers, regardless of whether they are paid or are unpaid;
  - (c) current and former *associates* of Northline;
  - (d) relatives, dependants and spouses of any of the individuals identified above at paragraphs 2.2(a), (b) and (c); and

(e) other eligible whistleblowers prescribed by regulation from time to time.

2.3 If the *disclosable matter* relates to the tax affairs of Northline, individuals fitting any of the abovementioned descriptions (exceptions apply) may qualify for protections available to whistleblowers under the *Taxation Administration Act 1953 (Cth)*.

### 3. Matters this policy applies to

3.1 This policy applies only to *disclosable matters*. All matters which are not *disclosable matters* will not be dealt with by Northline in accordance with this policy.

3.2 Only disclosures of *disclosable matters* qualify for protection under the *Corporations Act 2001 (Cth)*. This is so even if the disclosure is found to be incorrect. This is the second of the three qualifying conditions referred to in paragraph 1.4.

3.3 You have a *disclosable matter* if you have reasonable grounds to suspect that information you have is information which concerns any misconduct, or improper state of affairs or circumstances which relate to any Northline company or its *related bodies corporate*.

3.4 You are likely to have reasonable grounds to suspect if your suspicion is rational, is more than a mere possibility, and is not based on speculation, prejudice or mischief. You may also have reasonable grounds to suspect if your suspicion relates to any conduct by a Northline entity, or an officer or employee of such an entity which constitutes an offence under the *Corporations Act 2001 (Cth)* or any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more.

3.5 The following are examples of misconduct, or improper state of affairs or circumstances:

- (a) a breach of any regulatory obligation or law including theft, fraud, corruption, negligence, default, breach of trust, breach of duty, violence or threat of violence, money laundering, misappropriation of funds;
- (b) financial irregularities;
- (c) a systemic issue (not necessarily unlawful conduct) which the relevant regulator should be aware of, so that it can properly perform its functions;
- (d) business practices (not necessarily unlawful conduct) which cause or which create a significant risk of causing consumer harm or placing public safety at risk; and
- (e) engaging in or threatening to engage in detrimental conduct against a person who has disclosed a *disclosable matter*, or is believed or suspected to have made, or be planning to make, such a disclosure.

3.6 Please note that personal work-related grievances are not *disclosable matters* if they do not relate to any misconduct, or improper state of affairs or circumstances involving Northline. Personal work-related grievances which are not *disclosable matters* do not qualify for protection under the *Corporations Act 2001 (Cth)*.

3.7 An example of a personal work-related grievance which is not a *disclosable matter* and which does not qualify for protection is an interpersonal conflict between you and another employee.

3.8 An example of a personal work-related grievance which is a *disclosable matter* and which qualifies for protection is a personal work-related grievance which includes a plausible and non-frivolous complaint that Northline has breached an employment law



3.9 You do not have a *disclosable matter* if you make a deliberate false disclosure, or your disclosure relates to any unauthorised or improper conduct of any employee which does not represent the conduct of any Northline company. For example, if the disclosure relates to an allegation that an employee has committed a breach of Northline's social media policy.

#### 4. How to make a disclosure

4.1 You must disclose a *disclosable matter* to an *eligible recipient* or other recipients specified under this heading if you would like to qualify for protection under the *Corporations Act 2001 (Cth)*. This is the third of the three qualifying conditions referred to in paragraph 1.4.

4.2 You are encouraged to disclose a *disclosable matter* to Northline's FairCall Service in the first instance. Northline's FairCall Service is a free external hotline and reporting service independently administered by KPMG. This service is available 24 hours a day, 7 days a week.

4.3 Northline's FairCall Service is an *eligible recipient*, and use of this service allows Northline to address the matter quickly. It will also allow you to retain your anonymity throughout the process, should you choose to do so.

4.4 You may contact Northline's FairCall Service by:

- (a) calling: 1800 500 965;
- (b) e-mailing: faircall@kpmg.com.au
- (c) accessing the online service at: <https://northline.kpmgfaircall.kpmg.com.au/frontpage>
- (d) writing to: The FairCall Manager  
KPMG Forensic  
PO Box H67  
Australia Square  
Sydney NSW 1213.

4.5 When you contact Northline's FairCall Service, you have the following options.

- (a) Be completely anonymous. This means you do not disclose your identity or any information which may cause your identity to be known. You can choose to remain anonymous while making a disclosure, over the course of the investigation, and after the investigation is finalised. You can refuse to answer any question which you feel may reveal your identity at any time.
- (b) Be partially anonymous. This means you disclose your identity only to Northline's FairCall Service, and you do not consent to the disclosure of your identity to anyone outside Northline's FairCall Service, including anyone within Northline.
- (c) Maintain confidentiality only. This means you disclose your identity and consent to your identity being made known to Northline's *Protected Disclosure Officer* and Northline's *Audit and Risk Committee*; and you allow any disclosure beyond Northline's *Protected Disclosure Officer* and Northline's *Audit and Risk Committee* to be subject to the confidentiality of identity protection under the *Corporations Act 2001 (Cth)* (refer to paragraph 5.4 below).

4.6 If you choose to be completely or partially anonymous, a pseudonym will be used, you will be referred to in gender neutral terms, and any contact details offered by you will not be disclosed when the matter is assessed. If you choose any of the above options, you may still qualify for protections available to whistleblowers under the *Corporations Act 2001 (Cth)*.



- 4.7 You will have the option of disclosing any means of contacting you should you wish to be advised of the status and outcome of your disclosure. Depending on the nature of the matter, further assistance from you may be necessary. If Northline has no means of investigating the matter without your further assistance, its ability to carry out an investigation may be limited. As such, we recommend that you remain contactable following your disclosure.
- 4.8 Alternatively, a *disclosable matter* may be disclosed to Northline's *Protected Disclosure Officer* by:
- (a) e-mailing:                   protected.disclosures@northline.com.au  
(this is a secure e-mail account to which only Northline's *Protected Disclosure Officer* has access); or
  - (b) writing to:                   Protected Disclosure Officer  
Northline  
Level 1, 62 The Parade  
Norwood SA 5067.

If you choose to do so, you may choose to retain your anonymity as described in paragraph 4.5. Northline's *Protected Disclosure Officer* is an *eligible recipient*, and all disclosures of *disclosable matters* to Northline's *Protected Disclosure Officer* qualify for protection under the *Corporations Act 2001 (Cth)*.

- 4.9 Officers, senior managers, and auditors (internal and external) of Northline are also *eligible recipients*. However, officers and senior managers are defined under the *Corporations Act 2001 (Cth)* and disclosure to any person who does not fall within the definition officers and senior managers under the *Corporations Act 2001 (Cth)* will disqualify you from protection. To ensure that your disclosure qualifies for protection, you are advised to direct your disclosure to Northline's FairCall Service or Northline's *Protected Disclosure Officer*.
- 4.10 It may be appropriate for you to disclose a *disclosable matter* directly to a regulatory body. Disclosures of *disclosable matters* to:
- (a) the Australian Securities and Investments Commission;
  - (b) the Australian Prudential Regulation Authority; or
  - (c) some other Commonwealth body prescribed by regulation
- qualify for protection under the *Corporations Act 2001 (Cth)*. If the *disclosable matter* relates to the tax affairs of Northline, disclosure to the Australian Taxation Office qualifies for protections available to whistleblowers under the *Taxation Administration Act 1953 (Cth)*.
- 4.11 A disclosure of a *disclosable matter* to a legal practitioner for the purposes of obtaining legal advice or legal representation on the operation of the whistleblower provisions in the *Corporations Act 2001 (Cth)* also qualifies for protection under the *Corporations Act 2001 (Cth)*, even if the legal practitioner concludes that the disclosure does not relate to a *disclosable matter*.
- 4.12 Under limited circumstances, disclosure of a *disclosable matter* may be made to a journalist or a parliamentarian which qualifies for protection under the *Corporations Act 2001 (Cth)*. This will be so if the disclosure is a *public interest disclosure* or is an *emergency disclosure*.
- (a) A *public interest disclosure* is the disclosure of a *disclosable matter* to a journalist or a parliamentarian, where:
    - (i) at least 90 days have passed since you made the disclosure to Australian Securities and Investments Commission, the Australian Prudential Regulation Authority, or another Commonwealth body prescribed by regulation;



- (ii) you do not have reasonable grounds to believe that action is being, or has been taken, in relation to the disclosure;
  - (iii) you have reasonable grounds to believe that making a further disclosure of the *disclosable matter* is in the public interest; and
  - (iv) before making the *public interest disclosure*, you have given written notice to the body to which the previous disclosure was made which includes sufficient information to identify the previous disclosure, and which states you intend to make a *public interest disclosure*.
- (b) An *emergency disclosure* is the disclosure of a *disclosable matter* to a journalist or a parliamentarian, where:
- (i) you have previously made a disclosure of the *disclosable matter* to the Australian Securities and Investments Commission, the Australian Prudential Regulation Authority, or another Commonwealth body prescribed by regulation;
  - (ii) you have reasonable grounds to believe that the *disclosable matter* concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment;
  - (iii) before making the emergency disclosure, you have given written notice to the body to which the previous disclosure was made which includes sufficient information to identify the previous disclosure, and which states that you intend to make an *emergency disclosure*; and
  - (iv) the extent of the *disclosable matter* disclosed in the *emergency disclosure* is no greater than is necessary to inform the journalist or parliamentarian of the substantial and imminent danger.

You should contact an independent legal adviser before making a *public interest disclosure* or an *emergency disclosure*.

## 5. Legal protections

5.1 If your disclosure satisfies the three qualifying conditions for protection referred to in paragraph 1.4; in other words, you are an *eligible whistleblower*, and you disclose a *disclosable matter*, and you:

- (a) disclose to an *eligible recipient* (as described in paragraphs 4.3, 4.8 and 4.9);
- (b) disclose to the Australian Securities and Investments Commission, the Australian Prudential Regulation Authority, or some other Commonwealth body prescribed by regulation (as described in paragraph 4.9);
- (c) disclose to a legal practitioner for the purposes of obtaining legal advice or legal representation on the operation of the whistleblower provisions in the *Corporations Act 2001 (Cth)*; or
- (d) make a *public interest disclosure* or an *emergency disclosure*

you will be protected by protections available to whistleblowers under the *Corporations Act 2001 (Cth)*.

5.2 If all the qualifying conditions are satisfied, the protections which are available to you are:

- (a) confidentiality of your identity and content of disclosure;
- (b) protection from detrimental acts or omissions;



- (c) immunity from civil, criminal or administrative liability; and
- (d) entitlement to compensation and other remedies if any of the preceding protections is breached.

5.3 If your disclosure relates to the tax affairs of Northline, the qualifying conditions for protection under the *Taxation Administration Act 1953 (Cth)* are similar to the qualifying conditions for protection under the *Corporations Act 2001 (Cth)*. The protections which are available under the *Taxation Administration Act 1953 (Cth)* are also similar to the protections under the *Corporations Act 2001 (Cth)*.

5.4 Confidentiality of your identity and content of disclosure

- (a) If you have protection under the *Corporations Act 2001 (Cth)*, Northline has an obligation to protect the confidentiality of your identity and of the content of your disclosure.
- (b) However, your identity may be revealed:
  - (i) if you provide Northline with consent to do so;
  - (ii) to the Australian Securities and Investments Commission, the Australian Prudential Regulation Authority, or a member of the Australian Federal Police;
  - (iii) to a legal practitioner for the purposes of obtaining legal advice or legal representation; or
  - (iv) to a person or body prescribed by regulations.
- (c) If none of the circumstances described in paragraphs 5.4(b)(i) to (iv) apply, the content of your disclosure may only be disclosed if:
  - (i) such content does not include your identity;
  - (ii) Northline has taken all reasonable steps to reduce the risk that you will be identified from such content; and
  - (iii) it is reasonably necessary to do so for Northline to investigate the issues raised in your disclosure.
- (d) Any disclosure of your identity (or any content of your disclosure which is likely to result in the disclosure of your identity) by Northline or any person associated with Northline in a manner other than as permitted is unlawful.
- (e) You should note that notwithstanding Northline's best endeavours to maintain the confidentiality of your identity, your identity may be apparent if:
  - (i) you have previously mentioned to other people that you are considering making a disclosure;
  - (ii) you one of a very small number of people with access to the information; or
  - (iii) the disclosure relates to information that you have previously been told privately and in confidence.

5.5 Protection from detrimental acts or omissions

- (a) If you have protection under the *Corporations Act 2001 (Cth)*, Northline has an obligation to protect you and any other person (other than a wrongdoer) from any detrimental act or omission (or any threats of a detrimental act or omission) resulting from your disclosure, your intention to make a disclosure of a *disclosable matter*, or any belief or suspicion that you have or will make such a disclosure.



- (b) Any detrimental act or omission against you by Northline or any person associated with Northline resulting from your disclosure is unlawful.
- (c) A detrimental act includes:
  - (i) termination of your employment, or making a threat to terminate your employment;
  - (ii) demotion, altering your position or duties to your disadvantage;
  - (iii) discrimination or any other unfavourable treatment;
  - (iv) victimisation, harassment or intimidation;
  - (v) causing damage to your reputation; and
  - (vi) any other damage or harm or injury.
- (d) However, there may be circumstances where an act against you is not an act which you are protected from under the *Corporations Act 2001 (Cth)*. Examples of such acts are:
  - (i) administrative action that is reasonable for the purpose of protecting you from detriment (e.g. moving you from your work area to another office to prevent you from detriment); and
  - (ii) management of your unsatisfactory work performance, if such action is lawful and is in line with Northline's performance management policy.

#### 5.6 Immunity from civil, criminal or administrative liability

- (a) If you have protection under the *Corporations Act 2001 (Cth)*, you are protected from claims from Northline relating to the following liabilities:
  - (i) civil liability (e.g. any legal action against you for breach of an employment contract, duty of confidentiality or other contractual obligation);
  - (ii) criminal liability (e.g. prosecution for unlawfully releasing information (other than for making a false disclosure)); and
  - (iii) administrative liability (e.g. disciplinary action for making the disclosure) resulting from your disclosure.
- (b) Please note that the above protections do not grant you immunity from any misconduct by you which is revealed in your disclosure, or which is revealed following an investigation of your disclosure.
- (c) You should seek independent legal advice if you become subject to any claim relating to your disclosure, or if a threat of such a claim is made against you.

5.7 If Northline breaches any of its obligations to you described in paragraphs 5.4(a), 5.5(a) and 5.6(a), you can lodge a complaint with Northline. You may do so by contacting Northline's FairCall Service or Northline's *Protected Disclosure Officer*. You may also lodge a complaint with the Australian Securities and Investments Commission (or the Australian Taxation Office if your disclosure relates to the tax affairs of Northline). In some cases, you may be entitled to seek compensation and other remedies through the courts.

5.8 You should seek independent legal advice if Northline breaches any of its aforesaid obligations, or if any person associated with Northline has caused Northline to do so.



## 6. Support and practical protection from Northline

- 6.1 Northline's *Protected Disclosure Officer* will be available to assist you with enquiries relating to this policy, how you can make a disclosure, the progress of Northline's investigation, and any issues you may encounter before or after your disclosure. All contact with Northline's *Protected Disclosure Officer* should be made in the first instance by e-mailing or writing in the manner described in paragraph 4.8. If you are comfortable with discussing the matter in person or by phone, a discreet meeting or phone call may be arranged following your initial contact. Requests for assistance may also be directed to Northline's FairCall Service in the manner described in paragraph 4.4.
- 6.2 At all times, you will have access to Northline's Employee Assistance Program. This program is administered by Assure Programs and is available by calling 1800 808 374. This program includes professional counselling and other support services. All services are provided on a fee free and confidential bases.
- 6.3 To reduce the risk of compromising the confidentiality of your identity and the content of your disclosure:
- (a) all personal information or reference to you witnessing an event will be redacted;
  - (b) you will be referred to in a gender-neutral context;
  - (c) all disclosures will be handled and investigated by qualified staff;
  - (d) all paper and electronic documents and other materials relating to disclosures will be stored securely;
  - (e) access to all information relating to a disclosure will be limited to those directly involved in managing and investigating the disclosure;
  - (f) communications and documents relating to the investigation of a disclosure will not be sent to an email address or to a printer that can be accessed by other staff; and
  - (g) each person who is involved in handling and investigating a disclosure will be reminded about the confidentiality requirements, including that an unauthorised disclosure of a discloser's identity may be a criminal offence.
- 6.4 To prevent any detrimental act from happening:
- (a) to the extent that Northline's ability to do so is not limited by the anonymity of the disclosure, an assessment of risk of detriment against you and other persons (e.g. members of staff who are suspected to be the discloser) will be carried out as soon as possible after a disclosure is received;
  - (b) actions for protecting you and other persons (e.g. members of staff who are suspected to be the discloser) from risk of detriment may be taken; for example, you may be asked to perform other duties;
  - (c) managers will be reminded of their responsibilities to:
    - (i) maintain confidentiality;
    - (ii) address the risks of isolation, harassment and victimisation;
    - (iii) manage conflicts; and
    - (iv) ensure fairness when managing anyone who is involved in any disclosure or who is implicated in any misconduct.

6.5 If any protection to which you are entitled under the *Corporations Act 2001 (Cth)* (or the *Taxation Administration Act 1953 (Cth)*) is breached by Northline, and you make a complaint to Northline's FairCall Service or Northline's *Protected Disclosure Officer*, your complaint will be forwarded to an officer of Northline who is not involved in dealing with your initial disclosure. The officer will investigate your complaint and will provide recommendations on how the subject of your complaint is to be dealt with. Your assistance may be required for the officer to do so. As such, we recommend that you remain contactable following your complaint. The officer will provide you with regular updates on the progress of the investigation. Depending on the outcome, a range of remedial action may be taken by Northline, including:

- (a) disciplinary action or other action against persons who are responsible for carrying out the detrimental act; and
- (b) allowing you to take extended leave.

Northline will use its best endeavours to ensure that all complaints relating to any alleged breach of protection are promptly handled and investigated.

## 7. Handling and investigating a disclosure

7.1 All disclosures will be forwarded to Northline's *Protected Disclosure Officer* in the first instance, unless it will be a conflict of interest for Northline's *Protected Disclosure Officer* to be involved in any way. If this happens, the disclosure will be forwarded to a member of Northline's *Audit and Risk Committee* who does not have a conflict of interest. The responsibilities of Northline's *Protected Disclosure Officer* will then be assigned to this member for this particular disclosure. An acknowledgement of receipt of your disclosure will be sent to you if you choose to be contactable.

7.2 Northline's *Protected Disclosure Officer* is responsible for assessing whether each disclosure requires investigation and qualifies for protection under the *Corporations Act 2001 (Cth)* (or the *Taxation Administration Act 1953 (Cth)*). In doing so, advice from a legal practitioner may be sought.

7.3 If Northline's *Protected Disclosure Officer* is of the view that a disclosure requires further investigation, Northline's *Protected Disclosure Officer* will prepare a recommendation to address:

- (a) the nature and scope of the investigation;
- (b) the nature of any technical, financial or legal advice that may be required to support the investigation;
- (c) the timeframe for the investigation;
- (d) how the risk of compromising the confidentiality of your identity and the content of your disclosure may be limited; and
- (e) how the risk of any detrimental act may be limited.

This recommendation will be sent to Northline's *Audit and Risk Committee* for consideration.

7.4 Northline's *Audit and Risk Committee* will consider the recommendation of Northline's *Protected Disclosure Officer*, and will plan and manage an investigation of the matter. Northline's *Audit and Risk Committee* may do so with the assistance of external consultants, Northline's insurer and applicable regulatory bodies. Northline will assist all applicable regulatory bodies with their investigation of the matter.



- 7.5 The objective of an investigation is to determine whether there is enough evidence to substantiate or refute the disclosed matters. When an investigation needs to be undertaken, Northline will ensure that the process will be objective, fair and independent. Investigations will be carried out independently of you, individuals who are the subject of the disclosure, and the department or business unit involved. If Northline's *Protected Disclosure Officer* or any member of Northline's *Audit and Risk Committee* is the subject of the disclosure, or if it may otherwise be a conflict of interest for Northline's *Protected Disclosure Officer* or any member of Northline's *Audit and Risk Committee* to be involved in the handling or investigation of the disclosure, Northline's *Protected Disclosure Officer* or that member of Northline's *Audit and Risk Committee* (as applicable) will be required not to participate further in the handling or investigation of the disclosure.
- 7.6 Northline will use reasonable endeavours to provide you with updates of its investigation, should you choose to be contactable. The extent to which information will be made available to you will depend on the nature of the investigation. There may be circumstances where it may not be appropriate to provide details of the outcome of the investigation.
- 7.7 Northline is not obliged to reopen an investigation and can conclude a review if it finds that the investigation was conducted properly, or new information is either not available or will not change the findings of the investigation.

## **8. Ensuring fair treatment of individuals mentioned in a disclosure**

- 8.1 Northline will ensure that all persons who are the subject of a disclosure or complaint are treated fairly. Northline will do so by:
- (a) not disclosing the identity of such persons, when it is practical and appropriate under the circumstances;
  - (b) to the extent that it is appropriate to do so, such persons will be advised about the subject matter of the disclosure, and be given an opportunity to respond prior to any adverse finding or action being taken; and
  - (c) offering access to Northline's Employee Assistance Program described in paragraph 6.2.

## **9. Availability and review of policy**

- 9.1 This policy is published on Northline's website and on Northline's intranet, and is reviewed from time to time.
- 9.2 At the sole discretion of Northline, this policy may be amended from time to time to ensure it remains effective and consistent with all relevant legal requirements. You are advised to familiarise yourself with the latest published version of this policy before you make any disclosures.

## **10. Further information**

- 10.1 Clarification on any matter relating to this policy may be sought from Northline's *Protected Disclosure Officer* by e-mailing the enquiry in the first instance to [protected.disclosures@northline.com.au](mailto:protected.disclosures@northline.com.au).
- 10.2 Please note that Northline's *Protected Disclosure Officer* is unable to provide any legal advice, and that all advice given do not constitute legal advice.



## 11. Definitions

*Associate* means a director or secretary, a *related body corporate*, or a director or secretary of a *related body corporate*.

*Audit and Risk Committee* means the Chief Executive Officer, General Manager of Finance, and National Commercial Manager of Northline Partnership ABN 18 677 809 229.

*Disclosable matter* is as defined in paragraphs 3.3 to 3.8.

*Eligible recipient* is as defined in paragraphs 4.3, 4.8 and 4.9.

*Eligible whistleblower* is as defined in paragraph 2.2.

*Emergency disclosure* is as defined in paragraph 4.11(b).

*Protected Disclosure Officer* means the Chief Executive Officer of Northline Partnership ABN 18 677 809 229 or his nominee from time to time.

*Public interest disclosure* is as defined in paragraph 4.12(a).

*Related body corporate* is as defined by section 50 of the *Corporations Act 2001 (Cth)*.

