

WHISTLEBLOWING POLICY

Version	2 (01/10/2025)
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Policy

Our Purpose

1.1 Our Goals & Commitment

At Kyvalley Dairy Group we are guided by our company values. These values are the foundation of how we conduct ourselves and interact with each other, our clients, members, suppliers, shareholders and other stakeholders. The Company is committed to ensuring corporate compliance and promoting ethical corporate culture by observing the highest standards of fair dealing, honesty and integrity in our business activities.

Together with our values, we want to have feedback and encourage people to speak up when they see activity or behaviour that they feel is wrong or does not match our values. The goal of this policy is to provide very clear guidelines on how we approach and manage this feedback. With our whistleblowing policy, we aim to ensure:

- Every employee should have the chance to speak up anonymously when they feel we are not adhering to our corporate values. They should have a place to report misconduct, every report will be heard and acted on, and we will make improvements based on the results.
- Kyvalley Dairy Group believes everyone should be able to make reports anonymously. We commit to protecting informant's identities and they only need to reveal themselves if they choose to.
- We will investigate every report of misconduct. At the end of the investigation, we will document the results and provide feedback when appropriate.

1.2 Our Commitment

Kyvalley Dairy Group wants our employees to know they can provide information on any concerns they have, understand where they can report their concerns, know what happens after they make a report, and ensure they feel safe in providing a report. Kyvalley Dairy Group also wants to let them know about their right to be anonymous as well as how we, as an organisation, will ensure they are not subject to any retaliation or other abuse because they made a report.

1.3 What Conduct Should Be Reported

It is important that Kyvalley Dairy Group outlines what behavior we want to be reported under this policy. We want to hear from you if you witness or know about any behavior that is:

- Fraudulent;
- Illegal;
- Corrupt;
- Dishonest;
- Unethical;
- In violation of the law or any legal code;
- Creating an unsafe environment;
- In breach of any of our company's policies;
- Discrimination;
- Harassment and/or bullying of any kind;
- Any conduct which is detrimental to Kyvalley Dairy Group and could cause financial or non-financial loss;

1.4 What is not a Disclosable Matter?

A disclosure is not a whistleblowing Disclosable Matter when the disclosure is:

- trivial in nature with no substance;
- unsubstantiated allegations that are found to have been made maliciously, or knowingly to be false; or
- a personal workplace grievance.

Process For Making A Report

The following would be considered an "eligible person" and would fall under Kyvalley Dairy Group's whistleblowing policy.

- Employees (including directors, managers, interns, and secondees);
- Contractors, consultants, service providers, suppliers, business partners;
- Former employees;

This policy applies to all Kyvalley Dairy Group's businesses, divisions and offices. It also applies across all jurisdictions where we operate. If local legislation, regulation, or laws provide a higher level of protection than what is included in this policy, the local legislation will take precedence.

2.1 What Options Do Employees Have Available For Making A Report?

If an employee or eligible person would like to make a report, they have different channels available where they can do this. Detailed instructions for how to use and approach each of these channels is included in Appendix 1.

- Whistleblowing/Anonymous Reporting via link on Company website
- Via post Po Box 424 Kyabram, Vic 3620
- Speak with a senior leader at Kyvalley Dairy Group.
- Speak with the owner of Kyvalley Dairy Group's whistleblowing program;

2.2 You Can Remain Anonymous

Kyvalley Dairy Group respects and protects your identity if you choose to make an anonymous report. You can choose to remain anonymous while making a report, interacting with case managers during an investigation of your report, as well as after your case is closed. At any given time you can identify yourself, but this is your choice and at no point do you need to do this, or will you be forced to provide your identity. If you decide to disclose your identity, Kyvalley Dairy Group will work to protect your identity and will outline and document who in the organisation will know you submitted your report. Kyvalley Dairy Group will also take all steps necessary (and outlined in this policy) to ensure you do not suffer any retaliation.

It is worth noting that Kyvalley Dairy Group will make every endeavour possible to investigate your report, but in some cases, there are limitations of what can be achieved if the informant decides to remain anonymous.

2.3 What Is The Investigative Process?

It is important for Kyvalley Dairy Group to be transparent with our employees and outline what is the process for us to investigate a report submitted through our whistleblowing channels. Below, we have provided the different steps a case manager or member of our whistleblowing team will go through once a report is received until the case is closed.

- Report (anonymous or otherwise) is received.
- A case manager is assigned to the report to assess it and confirm its receipt.
- The case manager will do an initial assessment to confirm it is a valid report and request permission to investigate.
- The case manager will begin their investigation. This can include corresponding with the informant if there is a channel to do this.
- The case manager will investigate and update management and the informant per policy guidelines.
- Once the case manager has finalised their investigation and report, management and the informant will be updated.
- At this point, the case manager will hand everything over to management for any subsequent action to take place.

2.4 How We Use 3rd Parties

At Kyvalley Dairy Group we can utilise 3rd parties in our whistleblowing program and strategy. Examples of how we might utilise 3rd parties include:

- Whistleblowing Platform: Kyvalley Dairy Group can use a 3rd party whistleblowing platform to ensure we protect informant's identities and leverage technologies to ensure no one in our organisation can identify them. This platform also allows for 2-way, anonymous communication as well as case management and data protection features.
- Accounting Firms: Kyvalley Dairy Group uses 3rd party accounting firms to do forensic investigating of specific reports that come through our whistleblowing program.
- Investigative Firms: Kyvalley Dairy Group uses specialist investigative firms to investigate specific cases where we do not have the skills needed in-house. They are also used for investigations that we would prefer a 3rd party execute on due to the nature of the report.
- Human Resources: Kyvalley Dairy Group utilises human resources across our business and they may be involved in specific whistleblowing cases, ensuring we use human resource best practices as we assess, investigate, and take action.

2.5 Who Is Alerted To A Report

Once a report is submitted (anonymous or not), this report goes to General Manager Human Resources. This person will then assess the report and assign it to a case manager, who will manage the investigation.

Certain senior managers might be alerted to the report as part of the reporting process or if they are involved in the investigation in some manner. Any information that could potentially identify an anonymous informant will be held in the strictest confidence and will not be shared, unless Kyvalley Dairy Group is compelled by law.

2.6 What Is The Process Of Updating The Informant?

As part of our investigative process, Kyvalley Dairy Group will update the informant of the progress of the investigation. These updates can include the following:

- Kyvalley Dairy Group has confirmed the receipt of a report from the informant.
- Kyvalley Dairy Group has begun the investigative process.
- The investigation is currently ongoing.
- The investigation has been closed.

Kyvalley Dairy Group's commitment is that the informant will be updated once a month while the investigation is ongoing. They will then be updated once the investigation has been closed.

Kyvalley Dairy Group will strive to provide as much feedback on the investigation as possible. However, due to Kyvalley Dairy Group's privacy guidelines, there may be information that cannot be shared with the informant.

2.7 What If The Informant Is Not Satisfied With The Result?

If, after receiving the summarised report of the investigation, the informant is not satisfied with the result, they can escalate this to the Kyvalley Dairy Group CEO. The informant can provide this escalation in writing so that a formal review can take place. While CEO commits to review the request, Kyvalley Dairy Group is under no obligation to reopen the investigation. If the CEO concludes that the investigation was conducted properly and no new information exists that would change the results of the investigation, the investigation will be concluded.

2.8 Consequences of Making a False Report.

Anyone who knowingly makes a false report of 'Reportable Conduct', or who otherwise fails to act honestly with reasonable belief in respect of the report may be subject to disciplinary action, including dismissal.

The disciplinary action or sanction will depend on the severity, nature and circumstance of the false report.

How Informants Are Protected

3.1 Anonymity After Submitting A Report

Section 2.2 discussed how an eligible person can remain anonymous during the process of submitting a report. After submitting a report, the following policies around anonymity are in place to protect an informant's identity.

- The informant has the right to remain anonymous and does not need to identify themselves at any time during the investigation process.
- Kyvalley Dairy Group uses tools and platforms that help protect an informant's identity during and after submitting a report.
- At no time will Kyvalley Dairy Group force the informant to reveal their identity.
- The informant can refuse to answer questions they feel could identify themselves. If the informant reveals themselves at any time, you will document who will have access to their identity. This can include the case manager, whistleblowing program owner, etc.

3.2 Potential Retaliation

An informant might be concerned that staff, management, or the organisation might retaliate against them. In this case, Kyvalley Dairy Group will protect the informant from:

- Being terminated or having their employment ceased;
- Performance management;
- Harassment on the job or workplace bullying;
- Warnings or disciplinary actions;
- Discrimination;
- Any other action that can be perceived as retaliation for making a report;

3.3 Considered Risk of Retaliation

In the case of "considered risk of retaliation", the informant believes retaliation is near or imminent, and they are targeted for retaliation. In cases of considered retaliation, the informant should contact the General Manager Human Resources. The General Manager Human Resources will take the action they feel is appropriate as well as come up with recommendations for how the situation can be resolved. Potential steps to protect the informant from a considered risk of retaliation can include:

- The informant taking leave.
- The informant being reassigned to other duties.
- The informant being reassigned to another location.

3.4 Already Retaliated Against

If the informant feels that they have already been retaliated against, they should escalate this immediately to the General Manager Human Resources.

The General Manager Human Resources will take the action they feel is appropriate as well as come up with recommendations for how the situation can be resolved. Potential steps to protect the informant after retaliation has occurred can include:

- The informant taking leave.
- The informant being reassigned to other duties.
- The informant being reassigned to another location.

3.5 Retaliation Not Adequately Resolved

If the informant feels their report of retaliation was not resolved adequately, they can escalate this case in writing. The report will need to go to CEO and they will investigate the matter and process for how the retaliation was dealt with.

3.6 How Kyvalley Dairy Group Deals with Retaliation

Kyvalley Dairy Group does not tolerate any attempts to retaliate against an informant who has made a report. Any employee or associated person that found retaliating will face disciplinary action, including the potential to be terminated from their roles.

3.7 Separation of Issues

Kyvalley Dairy Group will be able to still raise any issues related to work or performance related issues. While Kyvalley Dairy Group will protect the informant from any retaliation, it is also important that they are still effective in their job. Kyvalley Dairy Group can still raise any performance or contract issues with the informant as long as they are kept separate and not influenced at all from any reports that have been made.

3.8 Protection & Immunity for Others

Other parties that might have to bear witness or are involved in the investigation will be protected from retaliation in the same manner as the informant.

3.9 Legislative/Regulation Protection & Assistance

If in any jurisdictions or locales where Kyvalley Dairy Group operates has whistleblowing protection laws that provide a higher level of protection than what is included in this policy, the local legislation will take precedence

section 4

Our Roles & Responsibilities

4.1 Roles

The roles within Kyvalley Dairy Group's whistleblowing program include the following:

- Program owner and whistleblowing protection officer (WPO);
- Day-to-day manager of Kyvalley Dairy Group's whistleblowing program;
- Case managers that investigate individual reports;
- Human Resources who are involved in cases and made aware of specific investigations

4.2 Responsibilities

The following are the responsibilities of each role in Kyvalley Dairy Group's whistleblowing program.

Program owner/whistleblowing protection officer: This individual owns the entire program and is measured on its overall success. This includes employees knowing and understanding the program, an easy process of making a report, investigating reports, as well as being a point of escalation for any concerns or retaliation that has taken place. While this individual reports into the organisation, the results of their work go directly to the Board of Directors.

Day-to-day manager: The day-to-day manager views incoming anonymous reports, assigns these reports to case managers, and manages them as they conduct investigations. This person is the first line of escalation and works collaboratively with case managers to ensure anonymous reports are heard and acted upon.

Case Managers: Case managers are assigned anonymous reports and their role is to investigate these reports. This includes interacting and asking questions of informants, as well as using the information provided to investigate the report submitted. Their investigation can be internal or external to the organisation depending on what was documented in the report. Their goal is to gather the facts and put forth a final report to management on what happened and what action they feel needs to take place.

Human Resources: Colleagues from human resources may be called upon to provide advice and guidance during any investigation. The whistleblowing program leverages their expertise and acumen to ensure Kyvalley Dairy Group are using HR best practices during investigations and we are treating all employees fairly.

Governance

5.1 Changes to Kyvalley Dairy Group's Whistleblowing Policy

From time to time, Kyvalley Dairy Group's whistleblowing policy will need to change to keep up with our values, best practices, improvements, as well as legislation and regulations. Any changes to our whistleblowing policy will be communicated with all employees and any relevant stakeholders. This policy and any changes made do form any contract of employment.

Any changes to Kyvalley Dairy Group's whistleblowing policy must be approved by the:

- CEO
- General Manager Human Resources
- Owner of Kyvalley Dairy Group's whistleblowing program

All changes will be reviewed by the Board of Directors and the Board can comment and provide feedback as necessary. All changes will also be documented in Kyvalley Dairy Group's whistleblowing policy and will be made available to all employees.

5.2 Reporting to the Board of Directors

The Board of Directors is updated every quarter on Kyvalley Dairy Group's whistleblowing program, inclusive of reports, investigations, and results. Reports or investigations carrying an undue amount of risk will be reported to the Board of Directors outside of the quarterly updates. The Board of Directors at any time can ask about anonymous reports, investigations, as well as the state of Kyvalley Dairy Group's whistleblowing program.

Kyvalley Dairy Group's whistleblowing program resides in the Compliance Committee of the Board of Directors. They are responsible and accountable for the implementation and effectiveness of Kyvalley Dairy Group's whistleblowing program.

Definitions

	Term	Definition
1	Channels For Reporting	<ul style="list-style-type: none">• Via post PO Box 424 Kyabram, Vic 3620• Speak with a senior leader at Kyvalley Dairy Group.• Speak with the owner of Kyvalley Dairy Group's whistleblowing program
2	All Relevant Local Legislation/Regulation	The Whistleblowers Protection Act 2001 (the Act)

Authorization

Authorizer	Brenton Howie
Title	CEO

