



Whistleblower Policy

Objective

Campsie RSL Group is committed to maintaining the highest standards of integrity, ethical behaviour, and accountability.

The objective of this policy is to:

- Encourage the reporting of suspected misconduct or wrongdoing
- Ensure individuals who make disclosures can do so safely and without fear of retaliation
- Provide appropriate protections in accordance with applicable legislation

Scope

This policy applies to:

- All officers and employees of Campsie RSL Group
- Contractors, suppliers, and their employees
- Associates of the Club
- Relatives, dependants, or dependants of a spouse of any of the above

This policy is available on the Club’s website and upon request from Human Resources.

Policy Statement

Campsie RSL Group encourages the reporting of any suspected misconduct, illegal activity, or improper conduct.

All disclosures made under this policy will be:

- Taken seriously
- Treated confidentially (subject to legal requirements)
- Assessed and, where appropriate, investigated in a fair and timely manner

Reportable Conduct

This policy applies to disclosures where a person has reasonable grounds to suspect misconduct or an improper state of affairs in relation to the Club.

This may include (but is not limited to):

- Fraud, theft, or dishonesty
- Corruption or bribery
- Illegal activities (including drug use/supply, violence, or criminal damage)
- Discrimination, harassment, bullying, sexual harassment, or victimisation

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- Breaches of Commonwealth or State legislation or local laws
- Serious misconduct, gross mismanagement, or substantial waste of resources
- Unsafe work practices or risks to health and safety
- Conduct that may cause financial or reputational harm to the Club
- Deliberate concealment of any of the above

Note: Personal work-related grievances should be managed under the Club’s Grievance Procedure unless they involve victimisation or a broader systemic issue.

Whistleblower Protections

Under the **Corporations Act 2001 (Cth)**, eligible whistleblowers who make a qualifying disclosure are entitled to legal protections.

A disclosure will qualify for protection if:

1. **The discloser is an eligible person**, including a current or former:
 - Employee or officer
 - Contractor or supplier (or their employee)
 - Associate of the Club
 - Relative or dependant of any of the above
2. **The disclosure is made to an eligible recipient**, including:
 - A designated internal contact under this policy
 - An officer or senior manager of the Club
 - The Club’s external auditor (or audit team member)
 - ASIC or APRA
 - A legal practitioner for advice regarding whistleblower protections
3. **The discloser has reasonable grounds to suspect wrongdoing**, including:
 - Misconduct or improper conduct
 - Breaches of legislation
 - Conduct posing a danger to the public or financial system

Protection from Detriment

Campsie RSL Group strictly prohibits any form of retaliation against a whistleblower.

This includes (but is not limited to):

- Dismissal or disciplinary action
- Harassment or intimidation
- Discrimination or victimisation
- Injury or damage to reputation

Any employee who engages in retaliatory conduct may face disciplinary action, including dismissal.

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A whistleblower’s protections apply even if the disclosure ultimately proves to be incorrect, provided it was made on reasonable grounds.

Confidentiality and Anonymity

The Club will take all reasonable steps to:

- Protect the identity of the whistleblower
- Ensure information is only disclosed on a “need-to-know” basis

It is an offence to disclose the identity of a whistleblower or information likely to identify them, unless permitted by law.

Disclosures may be made anonymously. However, this may limit the Club’s ability to:

- Seek further information
- Provide updates on the investigation

Involvement in Misconduct

If a whistleblower is involved in the misconduct they disclose:

- This does not prevent them from receiving protection
- However, it may be considered when determining any disciplinary outcome

Procedure

Reporting a Disclosure

A person who has reasonable grounds to suspect wrongdoing is encouraged to report the matter via one of the following channels:

Internal Reporting Options:

- Group Human Resources Manager
- Group Operations Manager
- Any officer or senior manager of the Club

External Reporting Option:

- External Auditor:
Strati & Associates Pty Ltd
 - Email: domenic@dastrati.com.au
 - Address: 380/376 Bay Street, Brighton-Le-Sands NSW 2216
 - Phone: (02) 9567 1418

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Additional (Tax Matters Only):

- Commissioner of Taxation
- Registered tax agent or BAS agent

Information to Include

Disclosures should, where possible, include:

- Dates, times, and locations
- Names of individuals involved
- Details of the conduct
- Any supporting evidence or witnesses

Providing detailed information assists in conducting a fair and effective investigation.

Investigation Process

All disclosures will be:

- Assessed promptly
- Investigated where appropriate
- Managed by an impartial person not involved in the matter

Investigations will be conducted:

- Fairly and objectively
- With regard to the rights of all individuals involved
- In a timely manner

Where appropriate, and subject to privacy considerations, the whistleblower will be informed of the outcome.

Confidentiality of Process

All disclosures and investigations will be handled confidentially, subject to legal obligations.

In limited circumstances (e.g. court proceedings), disclosure of information may be required.

Breach of Policy

Any breach of this policy, including:

- Retaliation against a whistleblower
- Failure to maintain confidentiality

will be treated seriously and may result in disciplinary action, including dismissal.

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The Club will take all reasonable steps to remedy any detriment suffered by a whistleblower.



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