



KEY TERMS

In these policies, the following words and expressions have the meanings given to them below.

Mountcastle or Group – means Mountcastle Pty Ltd and any associated subsidiaries.

Employee – means anyone employed by Mountcastle on a permanent, fixed term or part-time basis.

Casual employee – means anyone who is employed by Mountcastle with no firm advance commitment to ongoing work with an agreed pattern of work.

Contractor – means anyone providing services through an independent contracting agreement.

Customer – any person or business that buys goods or services from Mountcastle and any associated subsidiaries.

Senior Leadership Team – management roles reporting in to the CEO

Document Control

Policy Version:	Approved by:	Date:
20231124	Management and Board	November 24th, 2023
20240322	No change to policy, reviewed and approved by Mountcastle Board	March 22nd, 2024



Application:

This policy applies to all employees:

- full-time, part-time, casual, permanent or temporary;
- contractors and sub-contractors;
- volunteers, apprentices and work experience participants.
- Stakeholders of Mountcastle.

It applies to those in connection with Mountcastle who wish to raise a concern or report any wrongdoing related to the organisation's activities.

Policy Statement:

Mountcastle is committed to fostering a culture of integrity, transparency, and accountability. We recognise the importance of providing a safe and confidential mechanism for employees and stakeholders to report any concerns or wrongdoing within our organisation. This Whistleblower Policy outlines our commitment to protecting whistleblowers and aligns with the relevant legislation in Australia, including the Corporations Act 2001 and the Public Interest Disclosure Act 2013.

Reporting Channels

We provide multiple reporting channels to ensure that whistleblowers can make a report in a manner they find most comfortable and secure. Reporting channels may include:

- Internal Reporting: Whistleblowers may report their concerns to their immediate supervisor, the CEO, or any other designated individual or department within Mountcastle.
- Whistleblower Hotline: We have established a confidential and independent whistleblower service that allows whistleblowers to anonymously complete a protected disclosure in their preferred manner:
 - Call 1300 30 45 50
 - Email makeareport@stopline.com.au
 - Visit <https://mountcastle.stoplinereport.com/>
 - Post: Attention: Mountcastle, c/o Stopline, PO Box 403, Diamond Creek, VIC 3089, Australia

Protection of Whistleblowers

Whistleblowers who make reports in good faith will be protected from any form of retaliation, discrimination, harassment, or victimization.

The identity of whistleblowers will be kept confidential to the maximum extent possible, subject to legal obligations and the requirements of any investigation or legal proceedings.

We strictly prohibit any form of retaliation against individuals who report concerns in good faith. Any employee found to have engaged in retaliatory actions will be subject to disciplinary action, up to and including termination.

Handling and Investigation of Reports

All reports received will be treated seriously, promptly, and impartially. We will ensure that all allegations are properly assessed, investigated, and resolved.

Mountcastle's designated personnel are the Chairman, Chief Executive Officer and Company Secretary. They will be responsible for overseeing the handling of whistleblower reports, and ensuring compliance with relevant legislation and internal policies.



Whistleblowers will receive acknowledgment of receipt of their report, and appropriate updates will be provided on the progress of the investigation and its outcome, to the extent permitted by law and maintaining the confidentiality of all parties involved.

Good Faith Reporting and False Reporting

Whistleblower reports must be made in good faith, meaning the whistleblower has a reasonable belief that the information disclosed is true and accurate.

Deliberately making false or malicious reports with the intent to harm an individual or the organization may result in disciplinary action, which may include termination of employment or legal consequences.

Record Keeping and Compliance

We will maintain proper records of all whistleblower reports received, including the nature of the concern, actions taken, and the outcome of any investigations.

We will comply with all relevant legislation and regulations regarding the handling, storage, and protection of whistleblower information and records.

Communication and Awareness:

We will provide information and training to employees and stakeholders to raise awareness of this Whistleblower Policy and the procedures for reporting concerns or wrongdoing.

This policy will be made available to all employees and stakeholders through appropriate communication channels including employee induction material, and other relevant platforms.

Responsible Leadership

The leadership team is responsible for implementing and maintaining this Whistleblower Policy, promoting a culture that encourages reporting, and providing appropriate support and protection for whistleblowers.

We are committed to upholding the rights of whistleblowers and ensuring that concerns or wrongdoing within our organization are addressed promptly and effectively. This Whistleblower Policy demonstrates our commitment to transparency, accountability, and ethical conduct at Mountcastle.

Policy Governance & Revision

This Whistleblower Policy will be reviewed periodically to ensure its effectiveness and compliance with the relevant legislation. Updates and revisions will be made as necessary.