
WHISTLEBLOWER POLICY

PART A – POLICY

1 Policy and Objectives

1.1. Overview

Seven West Media (SWM) is committed to compliance with ethical business practice and this External Whistleblower Policy (“the Policy”) has been designed to encourage external parties (former directors, employees, relatives and dependants of directors and employees, and employees of suppliers as well as their relatives and dependants) to raise any concerns and report instances of fraud, corruption and misconduct, where there are objectively reasonable grounds to suspect wrongdoing, without fear of intimidation, disadvantage or reprisal.

1.2. Policy Objectives

The objectives of the Policy are to communicate the principles and procedures for reporting and escalating matters involving Fraud, Corruption and misconduct and the protection provided to those who report, or are witness to, any such conduct.

2 Policy Principles

2.1. General

SWM has various guidelines, policies and procedures that deal with the expected behaviour of personnel, including the Employee Conduct Guidelines, and the Fraud & Corruption Policy, etc.

External parties are encouraged to raise matters in accordance with section 4.1 of this policy and report via the channels communicated in section 5.1.

SWM 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.

3 Scope

3.1. General

The Policy applies to:

- (a) All external eligible whistleblowers/ reporting parties of SWM (former directors, employees, relatives and dependants of directors and employees, and employees of suppliers as well as their relatives and dependants); and
- (b) All activities of SWM and its related entities.

4 Policy Statements

4.1. Types of Disclosure

The types of conduct that should be reported under the Policy include any conduct of a director, officer, employee, contractor or third party, whether actual or suspected, where the reporting party believes the conduct to be:

- Fraudulent or corrupt (i.e. obtained benefit via deception);
- Illegal (such as theft or criminal damage to property) or in breach of legislation;
- An abuse of authority;
- A threat to health, safety or the environment; or
- Otherwise dishonest, unethical conduct.

If the reported matter is reasonably suspected to be a breach of the Corporations Act or the Australian Securities and Investment Commission (ASIC) Act it will be dealt with in accordance with these Acts, including the provision of all protection afforded by these Acts.

This Policy requires individuals to raise only genuine concerns which are based on

objectively reasonable grounds. Accordingly, in making a disclosure, you must:

- Have objectively reasonable grounds to suspect wrongdoing;
- Not act maliciously or make false allegations; and
- Not seek any personal gain.

4.2. Protection of Whistleblowers

Subject to compliance with legal requirements, upon receiving a report under this Policy, SWM will not, nor will any supervisor, manager or 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.

All files and records created from an investigation will be retained under strict security and release of information to someone not involved in the investigation without your consent as a whistleblower will be a breach of this Policy.

External whistleblowers are assured that a release of information in breach of this Policy will be regarded as a serious matter.

The external whistleblower is afforded immunities and protections under the law. A person who makes a disclosure which is then managed under this Policy will not be victimised, harassed or disadvantaged as a result of making a disclosure or cooperating with an investigation.

PART B – PROCEDURES

5 Reporting Channels

5.1. External Contacts

Fraud, Corruption or misconduct covered by this Policy can be reported directly to an independent third party who provide a service with the option for the reporting party to remain completely anonymous.

The *RightCall* service, operated by McGrathNicol, can be contacted through any one of these channels:

RightCall Hotline

- Within Australia: 1800 177 212 (toll free)
- Within New Zealand: 0800 402 735 (toll free)
- Outside Australia and New Zealand: +61 3 9038 3175 (tolled international call)

RightCall Website

- Submit a report via www.mcgrathnicol.com/rightcall

Email

- Send an email to rightcall@mcgrathnicol.com

Post

- Write to 'McGrathNicol RightCall' in an envelope marked 'Confidential' to GPO Box 9986, Melbourne 3001

McGrathNicol will not attempt to identify the reporting party in any way if it is the reporting party's wish to remain anonymous.

Reporting parties who wish to provide their identity to McGrathNicol, but wish to remain anonymous in any communication to SWM, will have their identity kept confidential by McGrathNicol.

Under no circumstances will McGrathNicol communicate information to SWM, or any other party, that the reporting party wishes to remain confidential unless compelled to do so by force of law.

5.2. Internal Contacts

The Head of Risk Assurance & Internal Audit operates independently of management, reporting directly to the Chairman of the SWM Audit & Risk Committee and is the primary point of contact within SWM for matters involving Fraud, Corruption or misconduct.

The Head of Risk Assurance & Internal Audit will not attempt to identify the reporting party in any way if it is the reporting party's wish to remain anonymous.

Reporting parties who wish to provide their identity to the Head of Risk Assurance & Internal Audit, but wish to remain anonymous in any communication to other parties within or outside SWM, will have their identity kept confidential.

Under no circumstances will the Head of Risk Assurance & Internal Audit communicate information to other parties within or outside SWM that the reporting party wishes to remain confidential unless compelled to do so by force of law.

5.3. Investigative Process

Disclosures managed under this Policy will initially be reviewed to determine whether the disclosure should be managed under an existing SWM policy or whether independent investigation is appropriate, and in such circumstances, all investigation outcomes will be reported to the Audit & Risk Committee (protecting relevant confidentiality where applicable).

Generally, where the identity of the whistleblower is known, the person who makes the disclosure will be kept informed of the outcome of the investigation, subject to considerations of the privacy of those against whom allegations are made and normal confidentiality requirements. There will be fair treatment of any parties mentioned in the disclosure throughout an investigation.

5.4 Malicious Allegations

SWM expects all parties involved to act honestly and with objectively reasonable grounds to suspect wrongdoing when disclosing information under this Policy or taking part in an investigation.

Any deliberately false or malicious allegations, whether under this Policy or otherwise, will be treated as a serious matter, as such false or malicious allegations could have significant effects on SWM's reputation and the reputations of the individual/s involved.

PART C – PROTECTED DISCLOSURES

Under Australian Commonwealth law, where an individual genuinely believes there has been a breach to the Corporations Act 2001 and/ or ASIC Act 2001, that individual is entitled to make a disclosure to the Regulator (ASIC), SWM's external auditor, a Director, senior executive or Authorised Officer (being the Head of Risk Assurance & Internal Audit or McGrathNicol's RightCall Hotline).

Eligible whistleblowers who have previously made disclosures, may also make immediate disclosures to a federal or state parliamentarian or journalist in circumstances where the whistleblower has objectively reasonable grounds to believe that 'there is an imminent risk of serious harm or danger to public health or safety, or to the financial system'.

Further, eligible whistleblowers may make disclosures to ASIC, Australian Prudential Regulation Authority (APRA) or relevant Commonwealth authorities, and a disclosure may be made to a legal practitioner for the purpose of obtaining legal advice or legal representation.

PART D – FURTHER INFORMATION

All queries regarding this Policy should be directed to the Head of Risk Assurance & Internal Audit.

This Policy is made available on SWM's website.

Last amended: December 2018