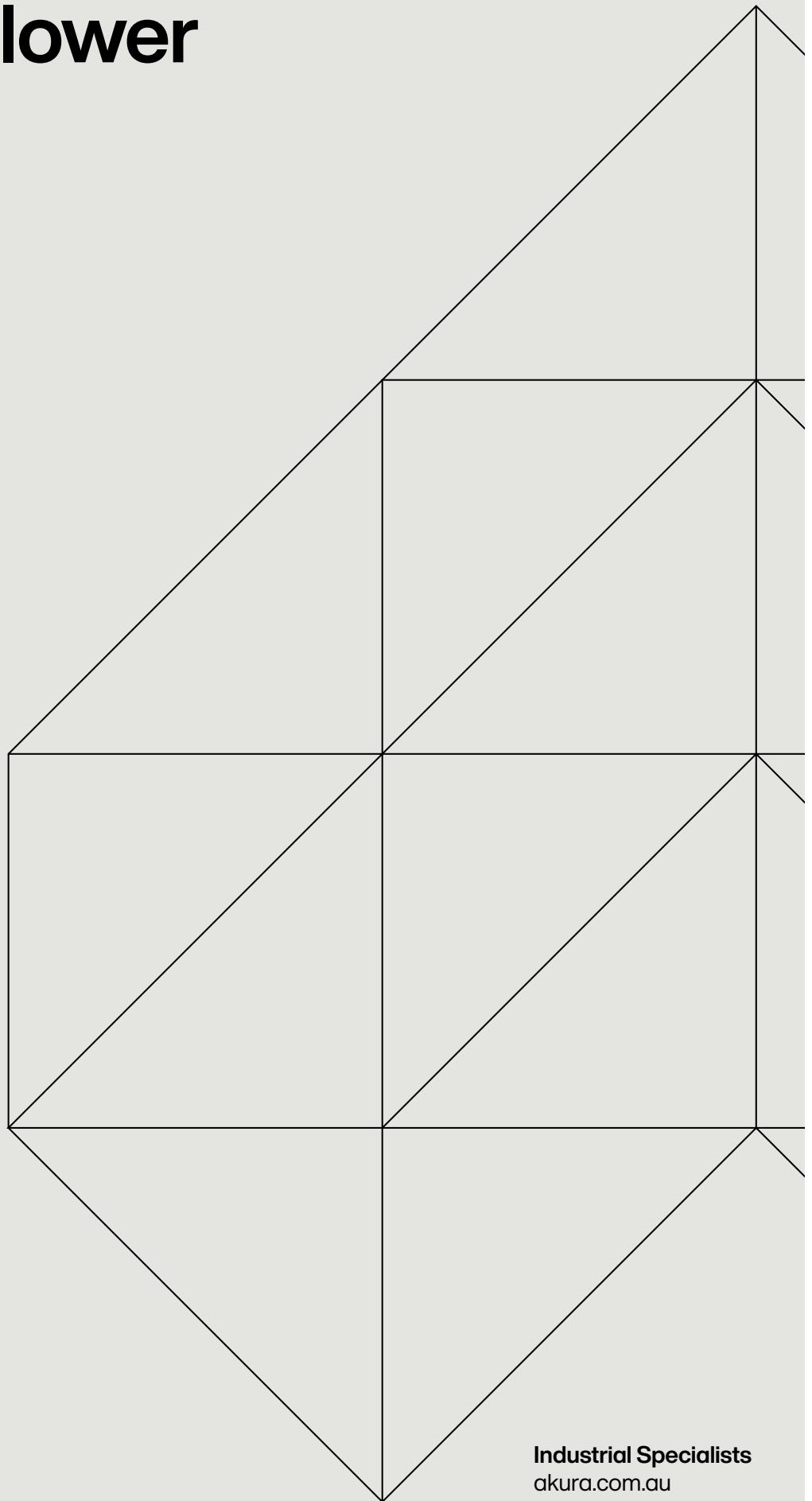


Whistleblower Policy



Policy statement

It is our aim to conduct ourselves with the highest of integrity in everything we do including the way we deal with our sub-contractors, our suppliers, our clients and each other. Akura recognises the importance of having a transparent Whistleblower Policy which encourages the reporting of any instances of suspected unethical, illegal, fraudulent or undesirable conduct involving Akura businesses. Akura will endeavour to ensure that those persons who make a report shall do so without fear of intimidation, disadvantage or reprisal.

This Policy details the framework for receiving, investigating and addressing allegations of criminal, dishonest or unethical behaviour where that behaviour concerns the activities of Akura or current and former directors, employees and clients of Akura.

Purpose and protection

The purpose of this Policy is to:

- Provide Akura staff with a clear framework within which to report issues of concern as well as an understanding of what can be reported under this Policy;
- Ensure any reports of reportable matter are dealt with appropriately
- Provide Whistleblowers with a clear understanding of how reports will be handled
- Protect Whistleblowers from victimisation and retaliation
- Support Whistleblowers throughout the reporting process
- Encourage Akura staff to speak up and raise breaches of internal rules or policy, or
- Conduct, including what happens when you make a report; and to
- Outline how Akura staff will be protected if making a report.

Reports

Reports can be made under this policy by;

- an employee or former employee of Akura
- a supplier or former supplier of Akura
- a contractor or former contractor of Akura
- an associate or former associate of Akura
- a spouse, relative or dependant of any of the above individuals

Matters that should be reported

A reportable matter means any information about Akura or employee/contractor that the Whistleblower has reasonable grounds to suspect misconduct. The types of issues that can be raised under this policy are in respect to:

- money laundering
- fraud, bribery or corruption
- breaches of our legal and regulatory obligations
- irregularities involving financial or accounting procedures
- any criminal offence, including theft or proprietary information or property
- conduct which is or may be in conflict with the Company's interests such as involvement with a competitor
- dishonesty or other irregularities in dealing with customers, vendors and other business partners
- illegal payments to government officials or companies
- conduct which endangers the health and safety of employees and others working for Akura
- conduct that represents a danger to the public
- soliciting and/or receiving gifts, services or benefits from external parties in excess of \$300 that have not been declared
- providing advantage or disadvantage, as the case may be, in the awarding of consultant, sub-contract or supply agreements, or variations to the same, to procure personal gifts, service or benefits from external parties
- conduct that is considered to be a deliberate act that is not for the benefit of the company e.g. active absenteeism including falsifying Medical or Annual Leave forms, deliberate non-compliance with reasonable instructions from authorised officers or the like



This list is not exhaustive. If you are not certain whether something is unethical, you are encouraged to raise in any event.

Every employee within Akura has a role and responsibility in ensuring Akura is run ethically and in accordance with its internal rules and policies. Where matters related to breaches of internal rules or policies or Disclosable Conduct are identified they should be raised as soon as possible. In instances where a person has concerns about making a report, reports can be made anonymously.

How to make a report

The following channels are available for reporting. If a Whistleblower has any questions or wishes to obtain additional information before making a report, they should contact a Whistleblower Protection Officer WPO.

If you become aware of a matter you should raise it as soon as practical with the staff responsible for handling matters, outlined below. Raising your matter early allows it to be addressed in the right way by an appropriate person. You should not attempt to conduct any investigation yourself before raising the matter as this could interfere with any future actions or, in rare cases, could put your safety at risk.

If you have fears for your wellbeing, safety, or fear of reprisal as a result of raising your matter, you should mention these at the time you report the matter. You will be protected by protections outlined under this Policy.

- Whistleblower Protection Officer:
Chief Operating Officer
- Whistleblower Investigation Officer:
Chief Financial Officer
- Whistleblower Investigation Officer email;
whistleblower@akura.com.au
Use this email as a preference of communication and it will be directed to the WPO or WIO.
- Senior Management
- Board of Directors
- Independent Whistleblower Service

Akura encourages employees and other Whistleblowers to make a report to Akura in the first instance so that it can identify and address wrong doings as early as possible.

Investigation

When you report a matter of a breach of internal rules, policy or Disclosable Conduct under this Policy, you should provide as much information as possible. Information such as dates, times, location, individuals involved, other witnesses, physical evidence (e.g. documents, images) and any other general information may be helpful to assist Akura to determine how to take appropriate action.

Any information you provide to Akura may be used in assessment of an investigation or other appropriate action.

Akura will do the following in a whistle blowing event:

1. We will investigate
2. We will keep you informed
3. We will report our findings to you to the extent permitted by law)

The Board of Directors will monitor the outcome of all whistleblower complaints.



Whistleblower Policy

Protection and support for Whistleblowers

It is a breach of this Policy to subject a Whistleblower to any detriment because they have made or propose to make a report under this policy.

Your details and the information you provide will be treated in strictest confidence. Akura will only share your details on a need-to-know basis with those who have a role to play in looking into your matter. In addition, there may be certain times under applicable law where Akura is required to share your details as part of its legal obligations.

If a Whistleblower believes they have suffered or may suffer detriment because they have made a report under this policy, or if any person has threatened to cause detriment to them or another person in connection with a report, they should immediately report the matter to a WPO.

Protection under the Registered Organisation (RO) Act

The RO Act provides protection to a person who makes a 'protected disclosure'.

A protected disclosure is defined in the RO Act.

A discloser is protected from reprisal being taken against them, to their detriment (whether by act or omission), as a result of making that disclosure.

Akura will not tolerate the harassment or victimisation of anyone who makes a disclosure where they have reasonable grounds to suspect misconduct or an improper state of affairs.

We recognise that employees or external parties may want to raise a concern anonymously or in confidence. We will protect their identity and will not disclose it without their consent, unless allowed or required by law.

Support for Whistleblowers

The WPO and Human Resources (if required) will connect the whistleblower with access to the Employee Assistance Program.

Review of this Policy

Senior Management will report to the Board of Akura on a regular basis or as necessary regarding the effectiveness of this Policy, and Akura's whistleblowing processes.

All such reports shall be identified and shall ensure confidentiality of Disclosers. If a report under this Policy relates to serious misconduct or involve a serious risk to Akura, the WPO may immediately notify the Board.

The Human Resource Director must keep this Policy under review to ensure it remains adequate, and at least annually, must formally review it to ensure it remains up to date and appropriate.



