Whistleblower **Policy**

Last Updated: June 2025

This **Whistleblower Policy** is designed to promote open communication throughout SCA, develop practices that reduce the risk of Reportable Conduct, and safeguard the reputation, values, and ethics of the strata sector. SCA supports the reporting of improper conduct.

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Purpose

The Strata Community Association (SCA) is committed to fostering a culture of ethical behaviour and good governance. The SCA will not tolerate any corrupt, illegal, or other undesirable conduct by its members nor condone victimisation of an individual who intends to report or has reported such conduct as a Protected Disclosure in accordance with this Policy.

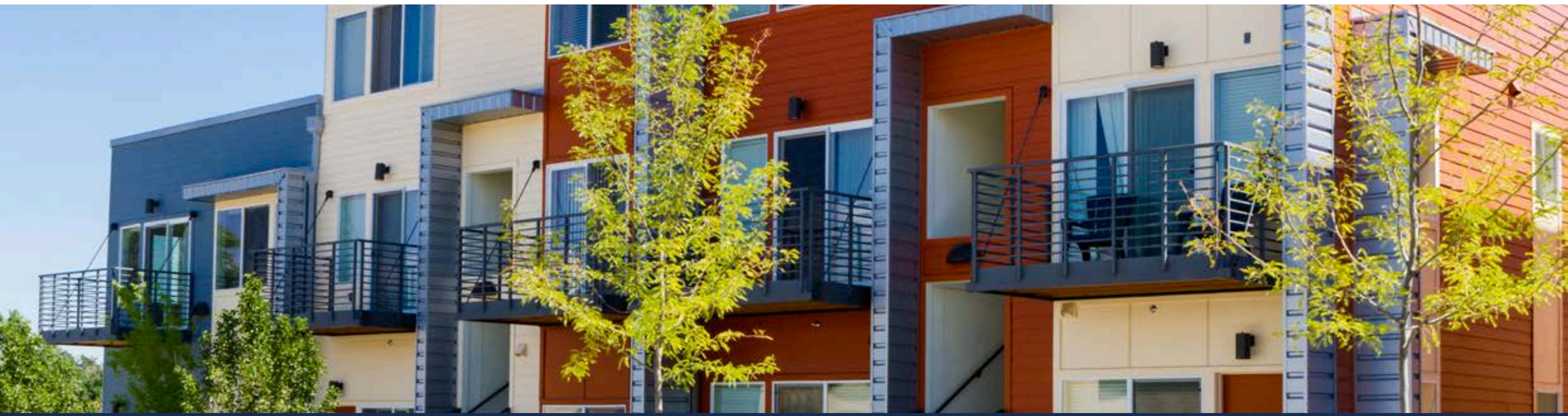
SCA supports the reporting of improper conduct. This Policy is designed to promote open communication throughout SCA, develop practices that reduce the risk of Reportable Conduct, and safeguard the reputation, values, and ethics of the strata sector.

This policy aims to:

- Provide any person making an allegation of Reportable Conduct ("Whistleblower") with a clear framework within which to make that allegation as a Protected Disclosure;
- Ensure any reports of Reportable Conduct are dealt with appropriately;
- Provide Whistleblowers with a clear understanding of how allegations will be handled;
- Identify strategies to protect Whistleblowers from victimisation and retaliation;
- Support Whistleblowers throughout the reporting process; and
- Afford procedural fairness to anyone who is the subject of an allegation of Reportable Conduct.

Definitions

Term	Definition
Member	All employees of businesses who hold a membership with the Strata Community Association.
Protected disclosure	A report of Reportable Conduct made in accordance with this Policy.
Whistleblower	A member who reports an activity that they consider to be illegal, unethical, or improper.
Whistleblower Protection Officer (WPO)	An officer appointed to safeguard the interests of the Whistleblower.



Policy

A Protected Disclosure is a report of Reportable Conduct made in accordance with this Policy. Nothing in this Policy is intended to abrogate or diminish any additional or alternative protections which may be available at law.

To be protected under this Policy, a Whistleblower must:

- Be acting honestly with genuine or reasonable belief that the information in the allegation is true or likely to be true.
- Make the disclosure in accordance with this Policy.
- Not themselves have engaged in serious misconduct or illegal conduct in relation to the Reportable Conduct.

SCA promotes a culture that encourages the reporting of Reportable Conduct and where a Whistleblower makes a Protected Disclosure that meets the requirements of this Policy, that person will not be the subject of disciplinary action or claims by SCA. SCA will take steps to protect the person from victimisation, retaliation, as a result of having made the report. The Whistleblower must, at all times during the reporting process, continue to comply with this Policy.

In circumstances where, for any reason, the identity of the Whistleblower is known outside of the investigation process, SCA will take reasonable steps within its power and authority to protect the Whistleblower from retaliatory or discriminatory action. SCA has no power to offer any person immunity against prosecution in the criminal jurisdiction or from any civil action which may be brought against the Whistleblower.

In some jurisdictions, in addition to the protections provided under this Policy, a person making an allegation of Reportable Conduct may be protected by local law from civil and/or criminal proceedings, and against retaliatory or discriminatory action as a result of having made an allegation protected by applicable local law. Whistleblowers should be aware that, in some jurisdictions, making an allegation to a government authority without using SCA's internal procedure may result in the loss of Whistleblower protection available under this Policy.

This Policy must be read in conjunction with the SCA Code of Ethics - June 2025

Reportable Conduct

This Policy supports the reporting of allegations of serious wrongdoing or Reportable Conduct by SCA, its members, or SCA's independent auditors.

Reportable Conduct includes, but is not limited to:

- Dishonest, corrupt, or illegal activities;
- Theft, fraud, money laundering, or misappropriation;
- A serious breach of the SCA's best practice procedures;
- Offering or accepting a bribe;
- Misuse of funds or resources in a manner that falls within the scope of Reportable Conduct;
- Damage/sabotage, violence, drug & alcohol sale/use;
- Risks to the health and safety of members or workers;
- Unethical conduct;
- Bullying, discrimination, harassment, or abuse;
- Victimising someone for reporting Reportable Conduct; and
- Any instruction to cover up or attempt to cover up serious wrongdoing.

This Policy extends to serious wrongdoing that occurs before or after the commencement of this Policy and is not limited to the above examples.

Making a Report

A Protected Disclosure may be made using the reporting channels outlined. Whistleblowers may make a report verbally or in writing to the Whistleblower Protection Officer (WPO) by email: whistleblower@strata.community

In the event a Whistleblower does not formally make a Protected Disclosure, SCA may nevertheless be compelled to act on the information provided if that information reasonably suggests Reportable Conduct has occurred or may occur.

Where a Whistleblower believes the SCA's internal processes are inappropriate because the alleged Reportable Conduct involves an SCA staff member; or the Whistleblower considers the matter should not be referred to the WPO; then the Whistleblower may make that report to the Chair of the Professional Standards and Membership Board Advisory Group (PSMBAG).

The WPO is appointed by the Chief Executive Officer to:

- Safeguard the interests of a Whistleblower by obscuring the name and identifying features from any internal reporting about the disclosure (unless you agree for your identity to be known);
- Assess the immediate welfare and protection needs of a Whistleblower and, seek to foster a supportive environment.
- Respond as appropriate and necessary to any concerns or reports of victimisation by a Whistleblower.

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 termination of membership or other professional conduct sanctions.

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

Confidentiality and Privacy

SCA will make all reasonable efforts to ensure the identity of a Whistleblower remains confidential throughout the investigation process. SCA will not disclose a Whistleblower's identity unless:

- The information is already in the public domain generally or known to the subject(s) of the disclosure.
- The Whistleblower consents to the disclosure of their identity.
- Disclosure identifying information is compelled by law.
- Disclosure is necessary to prevent a serious threat to any person's health or safety.
- It is necessary to protect or enforce SCA's legal rights or interests or to defend any claims.

Whistleblowers can report anonymously. Any supervisor or manager who receives a Whistleblower report must not disclose that report to anyone other than a WPO or the Chair of the PSMBAG.

A Whistleblower must keep all information relating to any allegation confidential at all times, both during any investigation process and following any resolution of an allegation.

What happens to your information?

Written feedback and complaints include correspondence received by email. SCA aims to respond to all written complaints within 15 working days, or within a reasonable timeframe depending on the complexity of the enquiry.

Verbal complaints are recorded in a report by the WPO. Generally verbal complaints to SCA about member entities will not be followed up unless a prudential issue is identified in the information supplied which requires further investigation. In certain cases where prudential issues appear to have been identified, we may contact you to obtain further details.

Investigation

A Whistleblower's report may only be investigated and acted upon following referral to the WPO. Any other person at SCA who receives a report of Reportable Conduct must immediately refer it to the WPO, take no further action, and keep the report confidential.

Once received, all allegations of Reportable Conduct pursuant to this Policy must be referred to the WPOs and include, at a minimum, the following details:

- The date the Whistleblower made the report.
- The date and substance of the Reportable Conduct.
- The identity and level of seniority of the alleged wrongdoer.
- The level of risk associated with the alleged wrongdoing.
- Whether maintaining confidentiality about the identity of the whistleblower is possible and appropriate in practice.

All Protected Disclosures will ultimately be reported to the PSMBAG, either as part of the Whistleblower Register or as standalone agenda items in circumstances where the WPO determines this is warranted or necessary.

The WPO or the Chair of the PSMBAG if applicable will determine whether sufficient information exists to allow the report(s) to be investigated, whether an investigation is required, and, if so, determine the appropriate investigation process, including:

- The nature and scope of the investigation.
- The methodology to be used to conduct the investigation, which will depend on its subject matter and whether it is necessary to ensure information identifying the whistleblower is not disclosed.
- Who will conduct the investigation and whether that person should be external to SCA.
- The nature of any technical, financial, or legal advice that may be required.
- A timeframe for the investigation (having regard to the allocated level of risk).

The Whistleblower will, if the WPO or the Chair of the PSMBAG deems it appropriate and permissible to do so, be informed on a continuing basis as to the nature and progress of the investigation.

SCA may be required to refer an allegation of Reportable Conduct to the Police or other agency (e.g., the Australian Securities and Investments Commission (ASIC) or the Australian Prudential Regulation Authority (APRA)). In such circumstances, SCA may not be able to keep a Whistleblower informed on the progress of a Protected Disclosure.

Disciplinary action, including termination of membership, may be taken against SCA staff or a member if they breach any aspect of this Policy.

Investigation Findings

SCA will apply principles of procedural fairness to the conduct of any investigation and resultant findings arising under this Policy.

The person leading any investigation will report their findings to the WPO (or directly to the Chair of the PSMBAG if the WPO has been circumvented due to a conflict as contemplated by this Policy) and advise the recommended course of action (if any) that SCA should take in response to the findings. Such action may include a disciplinary process or another form of escalation of the report within or outside of SCA.

The WPO and the Chair of the PSMBAG will determine the action (if any) to be taken. If appropriate, and subject to any applicable confidentiality, privacy, or legal constraints, the WPO may notify the Whistleblower of the conclusion of the investigation and the action taken.

Record Keeping and Accountability

SCA's Chief Executive Officer is the officer responsible for:

- Establishing and maintaining the Whistleblower Policy and procedures..
- Generating and distributing the Whistleblower Service details to the WPO.
- Communicating this Policy and the Whistleblower Service details to SCA offices and members.
- Otherwise ensuring maintenance and adherence to this Policy.

SCA will establish and maintain a record of all reports of Reportable Conduct received, the investigation process undertaken, and any actions taken to resolve the matter ("Whistleblower Register").

The WPO will coordinate and support the impartial investigation of Protected Disclosures, and submit a quarterly summary report to the PSMBAG, which provides statistics of:

- The number of reports received, per quarter.
- For each report, the type of misconduct alleged, the level of seniority of the alleged wrongdoer, and the level of perceived risk.
- For each report, the time taken to investigate it.
- The conclusion of each investigation (upholding or dismissing the report) and the nature of the action taken (such as disciplinary action).

The Chair of the PSMBAG shall periodically review the Whistleblower Register to ensure that proper processes are being followed.

This Policy and its implementation will be reviewed on an annual basis in terms of its suitability and effectiveness. Internal control systems and procedures will be audited regularly to ensure that they are effective in minimising the risk of non-compliance with this Policy.

All members are required to understand and comply with this Policy and to follow the requirements set out in this Policy.