

WHISTLEBLOWER POLICY

1. Context of the policy

1.1. Introduction

The Whistleblower Policy is part of Connexionz's efforts to ensure legal and ethical probity, promote the highest standards of behaviour and reduce the risk of fraud, corruption, and irregularity.

This policy is effective as at 15 December 2021 and will continue until it is replaced, retired, or superseded.

1.2. Purpose

The purpose of this policy is to detail one way in which serious wrongdoing is able to be addressed and controlled. The policy explains what is meant by 'whistleblower' and why it is necessary to have a policy in place protecting those who engage in 'whistleblowing'.

1.3. Compliance

This policy complies with the laws and practices that protect the rights of people who raise concerns about wrongdoings in or by Connexionz. This policy is in accordance with:

- Whistleblower and anti-retaliation protections under U.S. federal, state and local laws (U.S. Whistleblower Laws)
- The Protected Disclosures Act 2000 (the Act) (New Zealand);
- The Human Rights Act 1993 (section 66(1)(a)); and
- Connexionz Code of Conduct

2. Definitions

2.1 Whistleblowing

It is the voluntary disclosure of individual or organisational malpractice by a person who has or had privileged access to data, events, or information about an actual, suspected or anticipated serious wrongdoing within its ability to control.

2.2. Whistleblower

For purpose of this policy, a whistleblower is defined as a Connexionz director, officer, employee, former employee, contractor, supplier or service provider, intermediary or auditor who whether anonymously or not makes, attempts to make, or wishes to make a disclosure about serious wrongdoing.

2.3. Serious wrongdoing

Serious wrongdoing is any conduct which is:

- dishonest, fraudulent, corrupt, illegal or breaches of legislation,
- a breach of internal policies and code of conduct,
- unethical or other serious or improper conduct,
- unsafe work practices,
- harmful to Connexionz's reputation or any other conduct which may cause financial or non-financial loss to Connexionz or be otherwise detrimental to the interests of Connexionz.

While everyone is encouraged to speak up and report any concerns to Connexionz, not everyone nor all types of concerns are intended to be covered by this Policy.

Examples of the matters that are generally not intended to be covered by this Policy are Customer complaints or Personal work-related grievances.

3. Protected Disclosure

3.1 Making a Disclosure

Disclosures of serious wrongdoing must be based on information that is directly known to the person making the disclosure. That person must have reasonable grounds to suspect the alleged conduct has occurred and be made in good faith.

A disclosure can be made to:

- Connexionz Board of Directors
- Connexionz CEO, Manager (employees only)
- Connexionz Human Resources Representative (employees only),
- Connexionz Ethics and Compliance web page

3.2. Confidentiality and Consent

When a whistleblower makes a report under this policy, Connexionz will seek their consent in relation to how they would prefer information about their identity, including any information that is likely to identify them.

Information received from the whistleblower will be treated strictly confidentially, and will not be shared unless:

- the whistleblower has been consulted and consented to the disclosure in writing; or
- Connexionz is compelled by law to do so.

Any breach of confidentiality in relation to the disclosure or whistleblower's identity will be taken seriously and will be subject to investigation and potential disciplinary action.

3.3. Investigation

After receiving a disclosure, Connexionz will:

- Assess the disclosure and determine if the information disclosed is true or likely to be true
- Decide if it should be managed under this policy.
- Review any conflicts of interests.
- Appoint a whistleblower investigator.

The investigator will conduct the investigation in a timely, fair and impartial manner.

The investigator may need to contact the whistleblower or any other individual who may have relevant information regarding the investigation. If the whistleblower has not provided consent to be contacted, or declined to provide further information, this may limit or cease the investigation.

To ensure a fair process, any individual who is accused of serious wrongdoing will have the opportunity to respond to the allegations before any disciplinary action is taken.

All related documentation will be securely retained. The method for documenting the investigation and findings might vary depending on the nature of the disclosure.

The investigator may provide updates on investigation progress, findings and final outcome where appropriate and subject to confidentiality constraints. There may be circumstances where it is not appropriate to provide details of the investigation as it could affect the progress of the investigation.

Once all available evidence is obtained it shall be reported to the CEO and Board of Directors, who will call a meeting as soon as possible to consider the actions to be taken, including:

- Seeking legal advice.
- Invoking any disciplinary procedures contained in the employment agreement should the person who is the subject of the allegation be a staff member of Connexionz.
- If necessary, commissioning an independent expert investigation.
- Informing the Board's insurer if required

Following any investigation, the Executive Chair or the CEO are responsible for:

- understanding and addressing any control weaknesses
- applying disciplinary actions

In case the allegations involve the CEO, the Chairperson or the Executive Chair, the responsibilities normally assigned to those roles under this Policy will instead be assumed by the Board of Directors. The investigator will contact directly the Board of Directors to discuss how the investigation will be conducted and if required, a third-party, fully independent investigator will be appointed by the Board.

3.4. Welfare of the Whistleblower

Connexionz has an important responsibility concerning the welfare of the whistleblower within the organisation. All those persons must refrain from any activity

that is, or could be perceived to be, victimization or harassment of a person who makes a protected disclosure.

Connexionz is committed to the protection of genuine whistleblowers against action taken in reprisal for the making of protected disclosures.

The person who has made a report, or is thinking about making a report, and wish to seek additional support, will be entitled to use our Employee Assistance Program (EAP) that provides free and confidential wellbeing support services by qualified professionals face to face, over the phone or over the internet. The program consists of a number of services which can be found [here](#).

4. Administration and Review of this policy

The Board of Directors and Chief Executive Officer are responsible for the administration, review, interpretation, and application of this policy. This Policy will be included as part of the Board's schedule of policy reviews.