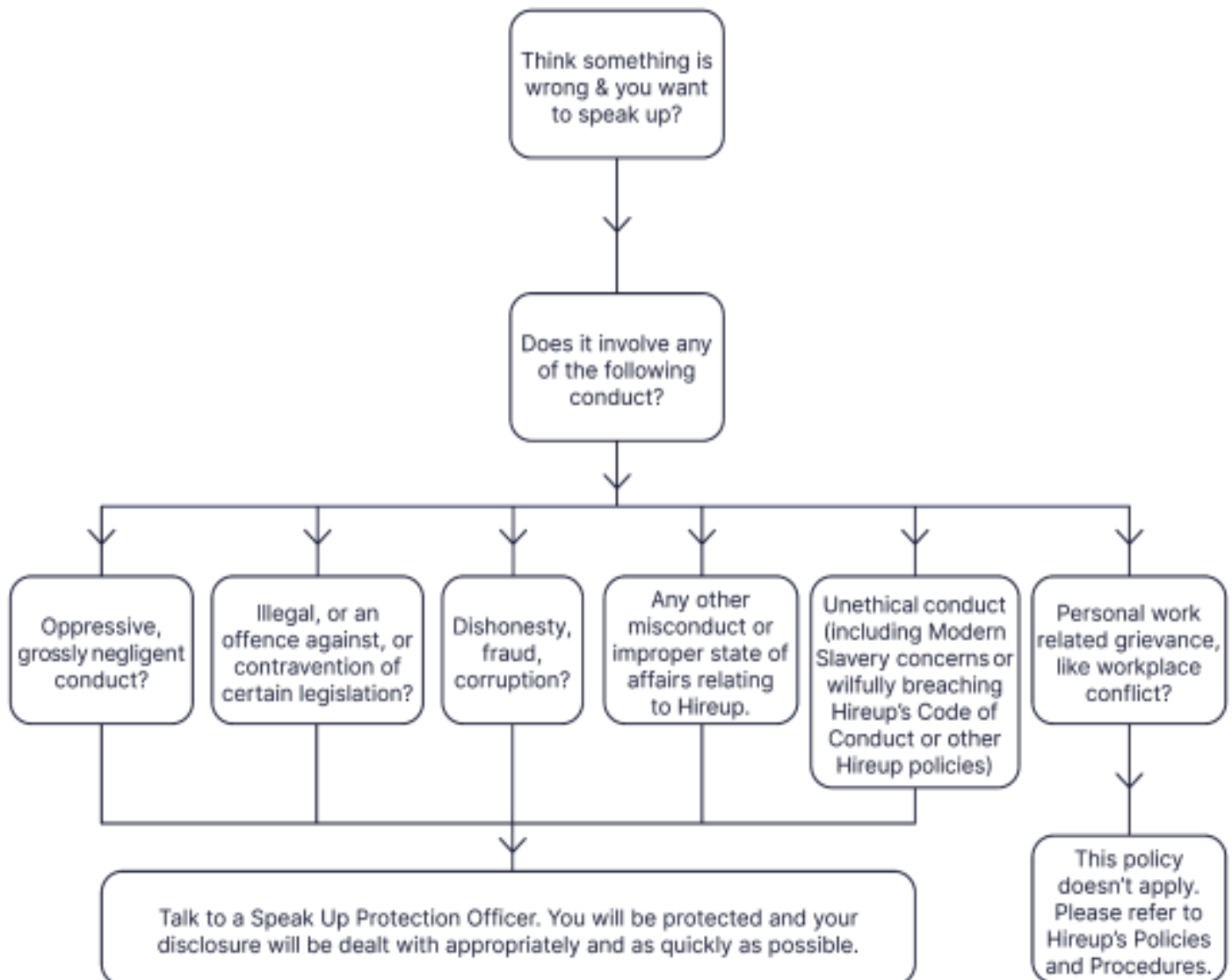


# Speak Up Policy

	Date of version	Drafted by Special Board Approval date
Creation (v1)	February 2020	Emily Moore (Head of Legal) February 2020
Version 2	October 2021	Catherine Plummer (Company Secretary) 19 October 2021
Version 3	October 2022	Catherine Hardy (Head of Legal and Company Secretary) [insert] October 2022

The steps involved in the Speak up Policy: an overview.



# 1. Purpose

At Hireup, we are committed to conducting business with fairness, integrity and respect for the law, and in accordance with our core operating principles and our values.

This policy is designed to ensure that you know how to disclose any wrongdoing and you can raise such concerns safely and securely knowing all reports will be handled appropriately and you will be protected.

This policy is our way of ensuring that our people are protected by the laws which apply to whistleblowers. In that regard, any reference to “speaking up” takes on the same meaning as a whistleblower under applicable legislation.

## 2. Who does this policy apply to?

This policy applies to former and current:

- (a) employees and volunteers of Hireup;
- (b) officers and directors of Hireup;
- (c) employees or contractors of suppliers, contractors and consultants (paid or unpaid) that provide goods or services to Hireup;
- (d) associates; and
- (e) relatives, dependants, spouses, (or relatives, and dependants of a spouse) of those individuals outlined in (a) - (d) above.

## 3. Speaking up

If you have reasonable grounds to suspect that information you have relates to misconduct or an improper state of affairs in relation to Hireup, we encourage you to speak up without fear of intimidation, reprisal or victimisation. We are committed to fostering a safe speak up culture which encourages protected disclosures about Reportable Conduct.

### 3.1 What can I speak up about under this policy?

You may speak up under this policy if you have reasonable grounds to suspect that you have information that relates to misconduct or an improper state of affairs relating to Hireup. This is very broad and includes circumstances where you suspect that a Hireup director, officer, employee or a contractor, supplier, consultant or other person who has business dealings with Hireup has engaged in conduct which is:

- (a) dishonest, fraudulent or corrupt;
- (b) oppressive or grossly negligent;
- (c) unethical (including Modern Slavery concerns or wilfully breaching Hireup’s Code of Conduct or other Hireup policies);

- (d) illegal, or an offence against, or contravention of certain legislation; or
- (e) any other misconduct or improper state of affairs relating to Hireup,

**(Reportable Conduct).**

It is important to recognise the seriousness of speaking up and that false claims can affect the integrity of true claims. Please only speak up about issues you genuinely believe to be true.

Disclosures of matters that are not Reportable Conduct do not qualify for protection under whistleblower laws.

### **3.2 What is not protected under this policy?**

Reportable Conduct does not include a report of misconduct that is solely a personal grievance you are having in the workplace. For example:

- (a) an interpersonal conflict between you and a colleague;
- (b) a decision relating to your engagement, transfer or promotion;
- (c) A decision relating to the terms and conditions of your engagement; or
- (d) a decision to suspend, terminate or otherwise discipline you.

These grievances should be reported in accordance with Hireup's Policies and Procedures and in accordance with relevant employment law.

## **4. How to speak up**

If you become aware of any Reportable Conduct, we encourage you to make a disclosure under this policy.

### **4.1 Who can I speak to at Hireup?**

In the first instance we encourage you to disclose any Reportable Conduct to the **Primary Speak Up Protection Officers** who hold the following offices at Hireup:

- (a) CEO;
- (b) Head of People and Culture; or
- (c) Head of Legal.

If you are unable, or not comfortable speaking with any of the Primary Speak Up Protection Officers, you can speak up to any of the following **Alternative Speak Up Protection Officers**:

- (a) Any Hireup officer or director;
- (b) Any legal practitioner working in Hireup's legal team;
- (c) Any members of the Hireup Executive Leadership Team (**ELT**); or
- (d) Auditors or members of an audit team conducting an audit of Hireup for the purposes of the Corporations Act.

Disclosures to a Primary Speak Up Protection Officer or Alternative Speak Up Protection Officer (both **Speak Up Protection Officers**) will ensure that your disclosure qualifies for protection under

this policy and the law. The Speak Up Protection Officers will ensure the processes in this policy are followed in relation to your disclosure.

It is important to know that disclosure to anyone other than a Speak Up Protection Officer may result in you losing the protections available under the whistleblower legislation.

## **4.2 Who can I speak to outside Hireup?**

If you do not feel comfortable making a report to a Speak Up Protection Officer, you may also make a report to the external independent company identified below.

### **4.2.1 External Hotline**

You may speak up about any Reportable Conduct to Hireup's external independent Speak Up service, Stopleveline, using any of the following methods:

**Email to:** [hireup@stopleveline.com.au](mailto:hireup@stopleveline.com.au)

**Calling the hotline number:** 1300 30 45 50

**Online using the website:** <https://hireup.stoplevelinereport.com/>

**By post to:** Hireup c/o Stopleveline, Locked Bag 8, Hawthorn VIC 3122

Stopleveline can receive calls at any time, 24 hours a day, 7 days a week. Your call will not be recorded and the person taking your call is not associated with Hireup. They are trained specialists dedicated to dealing with people speaking up and their concerns.

Stopleveline will provide a report to a designated Speak Up Protection Officer, in some circumstances you may be allowed to elect who the matter is reported to. The report will be kept confidential, except as required or permitted by law.

### **4.2.2 Regulatory Bodies**

You may also speak up about Reportable Conduct to the Australian Securities and Investments Commission (ASIC) or the Australian Prudential Regulation Authority (APRA). You will be covered by similar protections outlined in this policy.

### **4.2.3 Legal practitioners**

You may choose to speak up to an external legal practitioner. You will be covered by the same protections outlined in this policy.

### **4.2.4 Journalists and Members of Parliament**

In limited situations, you may consider that the Reportable Conduct is of such gravity and urgency that disclosure to a journalist or a member of parliament is necessary. There are certain restrictions around how and why you can make this type of disclosure, so we suggest you speak to an independent lawyer before making this type of disclosure.

## **4.3 Can I speak up anonymously?**

You can speak up anonymously at any time. If you choose to speak up anonymously, the Speak Up Protection Officer you speak to cannot, by law, identify you, or disclose information that is likely to lead to your identification (except in certain limited circumstances). If you are concerned

that your identity has been shared, please speak to the Head of Legal or any other Speak Up Protection Officer.

It may be more difficult for us to investigate matters you disclose if a report is submitted anonymously and we encourage you to share your identity when making a disclosure knowing that all reasonable measures will be taken to protect your identity.

## **5. What happens once I speak up?**

### **5.1 What steps will be taken once I speak up?**

Once you speak up, the Speak Up Protection Officer will assess the matter.

Any investigation will be conducted in a fair, independent and timely manner and all reasonable efforts will be made to preserve your confidentiality during the investigation.

If your report was not anonymous, or you have provided an anonymous means to communicate, the Speak Up Protection Officer or external investigator will contact you to discuss the investigation process. Where possible, the Speak Up Protection Officer will provide you with feedback on the progress, expected time-frames and findings of the investigation.

### **5.2 What protection will I receive if I speak up?**

Hireup is committed to ensuring any person who speaks up is treated fairly and does not suffer any detriment as a result of speaking up. All information that you provide when you speak up will be treated confidentially and sensitively. There are limited circumstances where Hireup is entitled to share information you've spoken up about.

Hireup is committed to ensuring that you will not experience any detrimental conduct if you speak up about Reportable Conduct under this policy and will take necessary action if you experience any detrimental conduct as a result of speaking up. Detrimental conduct includes actual or threatened conduct such as:

- (a) termination of your employment;
- (b) demotion, disciplinary action or alteration of your position or duties;
- (c) any discrimination, harassment, bullying, intimidation or victimisation;
- (d) harm or injury including psychological harm or damage to your property; and
- (e) damage to your reputation.

If you are subjected to detrimental conduct you should inform a Speak Up Protection Officer immediately. In certain circumstances, you may also seek alternate remedies if you believe you have not been afforded adequate protection.

It is important to remember you must have reasonable grounds to suspect Reportable Conduct. Reports found to be knowingly false, trivial, vexatious or maliciously made could result in disciplinary action.

## **6. What support is available?**

Please be aware that you may access Hireup's Employee Assistance Program (EAP) which is a free and confidential counselling service, using the details below:

**Phone:** 1300 364 273

**Text:** 0401 33 77 11 (within Australia)

**Web:** [acaciaconnection.com](http://acaciaconnection.com)

If appropriate, we may appoint an independent support person from the People and Culture team to support you.

You may also access third party support providers such as Lifeline (13 11 14) and Beyond Blue (1300 22 4636) for support.

## **7. Other matters**

Any breach of this policy will be taken seriously and may result in disciplinary action, up to and including termination of your employment.

Hireup may vary, remove or replace this policy at any time.

Employees are encouraged to read this policy in conjunction with other relevant Hireup policies, including the Permission to Play deck.