



Hardie Grant

Speak Up, Grievance and Whistleblower Policy

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Hardie Grant

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1. Purpose

Hardie Grant is committed to conducting business ethically, lawfully, and in accordance with its values. The purpose of this Policy is to provide a safe, confidential, and accessible process for reporting concerns about actual or suspected misconduct, unethical behaviour, or breaches of law.

Hardie Grant encourages individuals to speak up if they become aware of wrongdoing and is committed to ensuring that people who raise concerns in good faith are protected from retaliation.

This Policy supports compliance with:

- Corporations Act 2001 (Cth) whistleblower protections
- Australian Securities and Investments Commission (ASIC) guidance
- Hardie Grant's Code of Ethics and Conflicts of Interest Policy
- Anti-Bribery and Corruption Policy
- Human Rights and Modern Slavery Policy
- B Corp governance and accountability requirements

2. Scope

This Policy applies to all current and former:

- Employees
- Directors and officers
- Contractors and consultants
- Freelancers and temporary workers
- Authors and contributors
- Suppliers and service providers
- Literary agents and rights agents
- Joint venture partners
- Business partners
- Volunteers and interns
- Family members, dependants and spouses of the above
- Any person with information relating to misconduct connected with Hardie Grant

This Policy applies across all Hardie Grant entities and operations globally.

3. Our Commitment

Hardie Grant is committed to:

- Encouraging people to raise concerns without fear
- Protecting whistleblowers from retaliation
- Maintaining confidentiality wherever possible
- Investigating concerns fairly and impartially
- Taking appropriate corrective action when wrongdoing is identified
- Supporting transparency, accountability and ethical conduct
- No person will suffer disadvantage for making a report in good faith, even if the concern is ultimately not substantiated.

4. What Can Be Reported

Reports may relate to any actual or suspected misconduct, including:

- Financial and Corporate Misconduct
- Fraud
- Theft
- Bribery and corruption
- Financial misconduct
- False accounting or record manipulation
- Tax evasion or tax fraud
- Legal and Regulatory Breaches
- Breaches of legislation or regulations
- Breaches of publishing, consumer, privacy or employment laws
- Misleading or deceptive conduct
- Anti-competitive behaviour
- Workplace Misconduct
- Serious breaches of company policy
- Bullying, harassment or discrimination of a systemic nature
- Abuse of authority
- Serious workplace health and safety concerns
- Human Rights and Environmental Concerns
- Modern slavery risks
- Human rights violations
- Serious environmental misconduct
- Unethical supply chain practices
- Governance and Ethical Concerns
- Conflicts of interest
- Improper gifts or hospitality
- Misuse of company assets
- Retaliation against whistleblowers
- Attempts to conceal wrongdoing

5. Matters Not Generally Covered

This Policy is not intended to replace normal workplace grievance processes

Personal employment grievances that relate solely to an individual's employment and do not involve broader misconduct should generally be addressed through People & Culture processes.

Examples include:

- Interpersonal disagreements
- Performance management decisions
- Promotion decisions
- Routine workplace complaints

However, if such matters involve victimisation, legal breaches, systemic misconduct, or retaliation for speaking up, they may be reported under this Policy.

6. Reporting Channels & Process

If you become aware of actual or suspected misconduct, unethical behaviour or any matter covered by this Policy, you are encouraged to raise your concern as soon as reasonably practicable.

Hardie Grant encourages all whistleblower reports to be made through the **Speak Up** reporting channel at speakup@hardiegrant.com. This dedicated mailbox is monitored by the Head of People, Brand & Strategy and is managed confidentially in accordance with this Policy.

If you are not comfortable using the Speak Up reporting channel, or your concern relates to the person responsible for monitoring that mailbox, you may instead make a report to one of the following:

Reporting Channel	Contact
Speak Up reporting channel (preferred)	speakup@hardiegrant.com
Head of People, Brand & Strategy	Jacinta Hardie-Grant
Chief Executive Officer	Nick Hardie-Grant
Chair of the Board	Sandy Grant

Eligible external regulators Where permitted under applicable whistleblower legislation, disclosures may also be made directly to an eligible regulator or other prescribed body.

Where possible, reports should include:

- a description of the conduct or concern;
- the names of any individuals involved (if known);
- relevant dates, locations or supporting information; and
- any documents or evidence that may assist an investigation.

Individuals are not required to have proof of misconduct before making a report; however, reports should be made honestly and on reasonable grounds. All reports will be treated confidentially and handled in accordance with this Policy.

7. Anonymous Reporting

Hardie Grant encourages individuals to raise concerns as early as possible. Reports may be made anonymously, and individuals are not required to identify themselves to receive protection under this Policy.

Whistleblower reports can be submitted through Hardie Grant's **Speak Up** reporting channel by emailing speakup@hardiegrant.com. Reports may be made anonymously by using an email address that does not identify the sender or by withholding identifying information.

Hardie Grant will investigate anonymous reports to the fullest extent possible, recognising that anonymity may limit the ability to seek additional information or provide updates on the outcome of an investigation.

8. Confidentiality

Hardie Grant will take all reasonable steps to protect the identity of whistleblowers.

Information relating to a report will only be disclosed:

- To personnel directly involved in managing or investigating the matter
- Where required by law
- With the consent of the whistleblower

Unauthorised disclosure of a whistleblower's identity is considered serious misconduct and may result in disciplinary action. Investigation records will be stored securely and access restricted to authorised personnel.

9. Protected Disclosures

A disclosure will generally be protected where:

- The person has reasonable grounds to suspect misconduct or an improper state of affairs
- The report is made in good faith
- The disclosure is made through an eligible reporting channel
- Protected disclosures may qualify for legal protections under the Corporations Act 2001 (Cth).
- Individuals do not need to prove misconduct occurred in order to receive protection.
- Knowingly making false or malicious allegations may result in disciplinary action.

10. Protection from Retaliation

Hardie Grant has zero tolerance for retaliation.

Retaliation includes:

- Dismissal
- Demotion
- Harassment
- Intimidation
- Threats
- Discrimination
- Exclusion from work opportunities
- Damage to reputation
- Reduction in hours or responsibilities
- Contract termination
- Any other detrimental treatment

Anyone found to have retaliated against a whistleblower may face disciplinary action up to and including termination of employment or engagement.

11. Investigation Process

Stage 1 – Acknowledgement

Where contact details are available, reports will be acknowledged within five business days.

Stage 2 – Preliminary Assessment

An initial review will determine:

- Whether the matter falls within the scope of this Policy
- Any immediate risk requiring urgent action
- Appropriate investigation arrangements

Stage 3 – Investigation

Investigations will be:

- Independent
- Impartial

- Confidential
- Conducted as promptly as reasonably possible

Investigators may include internal personnel, Legal Counsel, or external specialists.

Stage 4 – Findings and Outcome

Following investigation:

- Findings will be documented
- Appropriate corrective action will be determined
- Any required disciplinary or legal action will be considered

Where possible and lawful, the whistleblower will be informed that the investigation has concluded.

12. Board Oversight

The Board is responsible for oversight of Hardie Grant's whistleblower framework.

The Board will receive:

- Annual reporting on whistleblower activity
- Trends and themes arising from disclosures
- Material investigations and outcomes
- Any significant compliance or governance concerns

Where a disclosure involves the CEO, Executive Leadership Team, or a Board member, the matter will be reported directly to the Board Chair and may be investigated independently.

13. External Disclosures

Nothing in this Policy prevents a person from making a protected disclosure to:

- ASIC
- APRA
- Australian Federal Police
- Fair Work Ombudsman
- Other authorised regulators
- A qualified legal practitioner for the purpose of obtaining legal advice regarding whistleblower protections

Individuals should seek independent advice where appropriate.

14. Record Keeping

Hardie Grant will maintain secure records of:

- Reports received
- Investigation actions
- Findings and outcomes
- Corrective measures implemented

Records will be retained in accordance with the Record Retention and Data Deletion Policy and applicable legal requirements.

15. Review

This Policy will be reviewed annually by the Head of People, Brand Strategy and Legal Counsel and approved by the CEO and Board.

Material changes will be communicated to all staff a

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