



Whistleblowing

Throughout PERSOLKELLY and Programmed, we are committed to ensuring that our work and services are delivered to the highest possible standard and above all else in a manner that is ethical, lawful and proper. We seek to promote a working environment that is open and which all of our employees are comfortable to report openly or anonymously instances of unethical, improper, unlawful or undesirable conduct without fear of reprisal or intimidation or fear.

With this in mind, we are launching our new Whistleblowing program called Speak Up and we aim to also raise your awareness and knowledge on what Whistleblowing actually means. The Speak Up logo which you will be promoted in training and posters, is an easy reminder of our whistleblowing policy and the protections afforded to you under the Programmed and PERSOLKELLY policy.

We have recently refreshed the existing whistleblower training and created a new dedicated reporting number and email address to assist our employees and officers with reporting.

HOW TO REPORT

EMAIL: speakup@programmed.com.au

CALL: 1300 035 808

POST: Attn: Principal Disclosure Officer,
47 Burswood Road,
Burswood WA, 6100
(mark correspondence as confidential)

PROSAFE: Scan the QR code to log a report using the Speak Up form in ProSafe.



Whistleblowing



Who can be a Whistleblower?

Whilst not fully exhaustive, the most relevant Whistleblower must be a current or former:

- employee of the company or organisation your disclosure is about, or a related company or organisation
- officer (usually that means a director or company secretary) of the company or organisation your disclosure is about, or a related What is Whistleblowing?
- Whistleblowing is about calling out possible wrong doing, misconduct or breaches of law.
- Quite simply, such examples could include fraud, engagement in modern slavery, under payment practices, discrimination, harassment, or other violations of law .

What protections are in place?

Calling out suspicious activity or conduct can be daunting however, there are clear processes and protections in place to support a whistleblower disclosure.

Under the Corporations Act 2001 (Cth), whistleblowers are protected from:

- Actual or threatened harm, such as loss of employment)Being sued (even if they are mistaken about their report)
- Their identity being revealed (if they choose to remain anonymous).

The legislation provides also provides that individuals who are the subject of a report are treated fairly. If a whistleblower report is made against you, you will be given the chance to tell your side of the story.

Will I be penalised or disciplined if my report is investigated and it turns out that my allegations were incorrect?

No, as long as your report was made in good faith (i.e. you genuinely believed in what you were reporting) and it was done so without malice.

What does the Whistleblower Policy not cover?

- Work-related grievances with your manager or another employee. Please contact your local HR team for advice.
- Breaches of privacy. Please notify privacy@programmed.com.au
- Reporting sexual harassment – we encourage notifications like this to go through the Open Door reporting QR code.



SPEAKUP

Below are some examples of what may constitute a Whistleblower disclosure

1. Edward works as a painter on a contract for PPS. The site is large and very public, with Programmed branding highly visible. He witnesses the supervisor taking constant shortcuts with safety and he knows that someone will get hurt. Edward tries to discuss his concerns with the supervisor but is told that they “don’t have time to mess about with all that stuff” and that there are serious pressures to get the job done early. Edward is also told to mind his own business. He later overhears the supervisor on the phone to the client. It appears that the supervisor has been promised a significant cash bonus “under the table” if he can get the job finished early and that the client has said he can do “whatever it takes.” Edward feels like he has to say something to someone but doesn’t know where to go because the team all seems to be really good friends with this supervisor. He is also afraid of losing his job if he speaks up.
2. Chelsea is a groundskeeper who has only been with the business for a few months. She overhears one of the project managers say that she is going to use Programmed-branded and owned mowers and equipment to make some extra cash on the weekends. The project manager also says that “if she does a bad job, she will be fine, because people will just think it’s Programmed’s fault.” Chelsea speaks up and tells the project manager that’s not appropriate. The project manager tells her not to be so square, but Chelsea still isn’t comfortable with this behaviour, so she goes to somebody more senior. A few days later, Chelsea’s employment is terminated for “unsuccessful qualifying.” Chelsea would be protected – by law, whistleblowers cannot be victimised because of her report. Steps would be taken to deal with the matter and reinstate Chelsea’s employment.
3. Julian is an account manager who is told by one of the other account managers, Erin, that she has been taking her family out to expensive restaurants using her company credit card and putting the expenses through as “client meetings.” This doesn’t feel right to Julian so he wants to speak up, but wants to do so without Erin finding out that it was him.
4. George is a project manager for PFM, is responsible for a large works portfolio that engages many subcontractors. Kyle, who recently took up a role under George started to notice that one contractor in particular was being used far more regularly than others and it appears that their quoted works were 2 - 3 times than that of their competitors. When approached by Kyle to see if multiple quotes are being sought for the works, George tells him, the contractor is a good friend of his and he’s been helping the contractor to scale the business. He advises that it’s ok though as the client’s paying for the work.

It is possible that some instances of whistleblower reporting will cross over with one of the above categories, so if you are not sure, please still notify speakup@programmed.com.au for a confidential discussion. We encourage all employees to review the revised whistleblower training slides in PageUp and to get in touch if they have any feedback.