

WHISTLEBLOWER POLICY

Background

IKAD Engineering Pty Ltd (“IKAD”) is committed to the highest standards of conduct and ethical behaviour in all activities.

The intent of this Policy is - where there are reasonable grounds to suspect such conduct - to encourage managers, employees, contractors, suppliers, customers, agents and brokers to raise any concerns and report instances of improper or corrupt conduct without fear of intimidation, disadvantage or reprisals.

Senior management of IKAD commits to providing appropriate protection for complainants, investigating all complaints or claims in good faith, and ensuring adverse activities or behaviours are eliminated.

Overview

This Policy is intended to encourage people to report any issues they believe are:

- dishonest, fraudulent or corrupt.
- illegal.
- unethical or in contravention with IKAD’s policies and procedures.
- may cause financial or non- financial loss to IKAD.
- related to any other kind of impropriety.

Where a report is made under this policy:

- the disclosure must be made in good faith.
- the whistleblower must have a reasonable belief the information disclosed, and any allegation contained in it, is substantially true.
- the disclosure must not be made for purposes of personal gain.
- the disclosure must not be malicious or vexatious.

IKAD is committed to:

- operating with the highest legal and ethical standards.
- supporting and protecting persons who make disclosures under this Policy or other applicable legislation.
- conducting investigations in a fair and objective manner.
- informing persons who make disclosures under this Policy of the progress and outcome of any investigation.
- taking disciplinary action against any person found to have engaged in wrongdoing and, where appropriate, notifying the relevant authorities.
- taking appropriate action to rectify any wrongdoing.
- reviewing the policy and processes as appropriate.



Responsibilities

All IKAD managers, employees and contractors are under obligation both expressly and implied to act with integrity at all times. IKAD does not tolerate improper or corrupt conduct by its managers, employees or contractors.

It is the responsibility of senior management to create, maintain and promote a culture of honesty, integrity and compliance at all times.

All managers have a responsibility to uphold the principles outlined within this policy and ensure appropriate awareness of this policy and its content with staff and contractors.

In the event disclosure to police or external bodies is required it will be undertaken carefully to ensure the complainant is adequately protected and the nature of the claim is kept largely confidential.

IKAD expects managers, employees, contractors, suppliers, customers, agents and brokers who become aware of the occurrence of improper activities to report their suspicions.

Process

Reports may be verbal or written and should be immediately referred directly to the Managing Director. It is recognised that managers, employees or contractors may potentially prefer to report a concern more informally with management.

In such a case, management is expected to respect the complainant's concerns, and refer the matter to the Managing Director for investigation. Where this is the case IKAD will provide protection to the person making the report and ensure they are not victimised and do not face reprisals as a result of making the report.

If a report is made anonymously it will be assessed in good faith with regard to the seriousness of the issue and the credibility of the concern.

IKAD will investigate reports made under this policy in a timely, thorough, confidential, objective and fair manner. The complainant will not be subjected to any adverse pressure or victimisation. Where appropriate, feedback will be provided to the complainant regarding the investigation progress and/or outcome.

Review

Senior management of IKAD will review the effectiveness of this policy, regularly as well as following the completion of an investigation of a matter reported under this policy.

A handwritten signature in blue ink, appearing to read 'Ivan Donjerkovich', is positioned above the printed name.

Ivan Donjerkovich
Managing Director

12th September, 2021