

WHISTLEBLOWING POLICY

Saunders International Limited (“Saunders”) is committed to fostering a ‘speak up’ culture in which transparency, accountability, honesty, integrity and ethics is part of everyday behaviour and exemplary corporate governance.

The purpose of this policy is to encourage and facilitate prompt and appropriate reporting and handling of Reportable Conduct, in compliance with the whistleblower protections afforded under the Corporations Act 2001 (**the Act**) and other laws.

This policy provides protections, measures and assurance so that anyone submitting a report may do so in good faith, without fear of intimidation, disadvantage, reprisal, victimisation, dismissal or retaliation.

Whistleblowing is the disclosure, by an Eligible Whistleblower (as defined by the Act), of Reportable Conduct.

- Reportable Conduct may include, but not be limited to, any past, present or likely future conduct suspected to be:
 - Corrupt
 - Unethical
 - Unlawful (including in relation to tax laws, modern slavery, discrimination, victimisation, harassment and bullying)
 - Damaging or risking damage to the environment
 - Misuse or mismanagement of resources
- Reportable Conduct is not:
 - Personal work-related grievances e.g. interpersonal conflict, decisions about promotions
 - difference of opinion about a company policy, procedure, or business decision adopted.

Reportable Conduct can be disclosed to an Eligible Recipient:

- A senior officer or manager of Saunders, including the Head of P&C
- A person authorised by Saunders to receive a disclosure
- An auditor or actuary for the group

Confidentiality of all reports will be maintained and the identity of Eligible Whistleblowers will be protected to the fullest extent possible.

The Head of P&C handles complaints and conducts all necessary investigations and acts as the Protection Officer of the matter: protecting and safeguarding the whistleblower from retaliation and maintaining the confidentiality of the Whistleblower.

This Policy is communicated to all employees and subcontractors through the induction process and by placement in workplaces. It applies to all activities undertaken by Saunders and should be read in conjunction with SND-HRM-PRO-013 Whistleblowing procedure.

This policy will be subject to biennial review to ensure it remains relevant, adequate and effective.



A handwritten signature in blue ink, appearing to read 'A. De Angelis', is positioned above the name of the Managing Director.

ANGELO De ANGELIS
Managing Director & Chief Executive Officer