
LOCALITY PLANNING ENERGY HOLDINGS LIMITED WHISTLERBLOWER PROTECTION POLICY



1. PURPOSE

LPE is committed to maintaining a high standard of integrity, investor confidence and good corporate governance. This Whistleblower Protection Policy forms part of LPE's risk management strategy.

2. WHAT DOES THIS POLICY DO?

You may have concerns about conduct within LPE which you consider to be potentially illegal, unethical or improper, but you may feel reluctant to raise these concerns because of the possibility of adverse repercussions. The aim of this policy is to encourage you to raise concerns by offering a reporting and investigative mechanism that is objective, confidential, independent and provides you with protection from reprisal.

Please note, that under this Policy:

- a. you are encouraged to report your concerns, either openly or anonymously
- b. you will be afforded confidentiality unless you indicate (or the law requires) otherwise
- c. your concerns will be properly investigated with the objective of determining the truth and correcting any wrongdoing where possible
- d. you will be advised, to the greatest extent practicable, of the outcome of the investigation
- e. as long as there is a basis for your concerns, and that you have acted in good faith and without malicious intent, you will not be adversely affected because of your action in reporting your concerns

3. WHO DOES THIS POLICY APPLY TO?

This Policy applies to:

- a. current and former LPE employees
- b. officers (including Directors) of LPE
- c. contractors
- d. suppliers
- e. unpaid workers
- f. relatives and dependants of any of the aforementioned individuals

4. POLICY ON WHISTLEBLOWING

All LPE employees have a responsibility to help detect, prevent and report instances of suspicious activity or wrongdoing. These instances are referred to as a Reportable Matter. You are encouraged to raise concerns about any relevant issue or suspicion as early as possible with your immediate manager. Serious matters will be escalated to senior management. LPE is committed to ensuring that all employees have a safe, reliable and confidential mechanism through which they can report any Reportable Matters. You should report a Reportable Matter under this Policy if you:

- a. have previously reported a Reportable Matter and you are not satisfied with the response to your report
- b. feel unable to raise the Reportable Matter with your manager, either because your manager is the subject of your report or because you have another reason to believe that your manager is unlikely to deal with the report properly

5. WHAT IS A “REPORTABLE MATTER”?

A Reportable Matter is any actual or suspected concern involving the following conduct, or the deliberate cover-up of such conduct:

- a. financial irregularity
- b. corrupt conduct
- c. criminal conduct
- d. failure to comply with any legal or regulatory obligation
- e. unfair or unethical dealing with a customer
- f. unethical or other serious improper conduct, including breaches of LPE policies
- g. misconduct, or an improper state of affairs or circumstances
- h. danger to the public
- i. offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more

6. HOW TO REPORT

Any report under this Policy can be made via any of the following, noting it may depend on the matter and the person who is the subject of the matter:

- a. the relevant General Manager or Departmental Manager
- b. LPE’s independent HR Consultant
- c. LPE’s independent Auditors
- d. the CEO
- e. the COO
- f. the Chairman
- g. via LPE’s secure and anonymous whistleblower email address, whistleblowing@localityenergy.com.au (which is monitored by LPE’s independent HR Consultant)

You may bypass a person in the above list if that person is the subject of the report or if you have reason to believe that the individual is unlikely to deal with the report appropriately. Reports can be submitted anonymously if this is preferred, however this may impact the capacity of the organisation to investigate the matter properly and to communicate with you about the progress/outcomes your report.

Nothing in this Policy should be taken as restricting you from reporting any matter or providing any information to a regulator, LPE’s auditor or a member of the audit team or any other person in accordance with any relevant law, regulation or other requirement.

7. IF YOU NEED HELP WITH THIS POLICY

If you would like general advice on this Policy or its application, please contact LPE’s independent HR Consultant.

8. ACTION REQUIRED WHEN YOUR REPORT IS MADE

The person who you make a report to under this Policy must do the following:

- a. ensure that the matter is properly investigated by the person nominated for the purposes of this Policy as the Whistleblowing Investigations Officer (who in this instance is LPE’s independent HR Consultant)
- b. give particulars of the report that has been submitted, to the CEO, the COO and LPE’s Chairman

9. INVESTIGATION PROCESS

Investigation processes will vary depending on the precise nature of the conduct being investigated. The objective of the investigation is to determine whether or not the concerns can be supported, with a view to rectifying any wrongdoing that is discovered to the greatest extent possible. The investigation will be independent, objective, thorough and fair. The investigation will be compliant with the principles set out in the Australian Standard on Whistleblower Protection Programs.

10. COMMUNICATING WITH YOU ABOUT YOUR REPORT

The Whistleblower Investigations Officer will keep you informed of the outcome of the investigation arising from your report, subject to considerations of the privacy of anyone who is the subject of the Reportable Matter and normal confidentiality requirements. Where practicable, you will be provided with initial feedback within a week of making your report, and any further feedback on a fortnightly basis as the matter progresses.

11. YOUR PROTECTION

The person who you make a report to under this Policy may, if you agree, disclose your identity to the Whistleblower Protection Officer (LPE's independent HR Consultant), but will otherwise keep your identity confidential. They will ensure that all files relating to your report are kept secure, and that information received from you is held in confidence and is only disclosed to a person not connected with the investigation if:

- a. you have been consulted and have consented to the disclosure; or
- b. it is required or permissible by law; or
- c. it is possible that someone might deduce your identity without there having been a breach of confidentiality, if the nature of your report points to one particular individual having made it, or otherwise as a consequence of the nature of the investigatory process.

LPE recognises that "whistleblowing" can be a very stressful and difficult thing to do. Provided that you are acting in good faith and that you have not yourself engaged in serious misconduct or illegal conduct, to the maximum extent possible you will not be subject to disciplinary sanctions by LPE in relation to any matters that you report. LPE will safeguard your interests, having regard to this Policy, the Australian Standard on Whistleblower Protection Programs, and any other applicable policies and laws. In particular, LPE will take whatever action is possible consistently with this Policy to make sure that you are not personally disadvantaged for making your report, whether by dismissal, demotion, any form of harassment, discrimination or any form of current or future bias. If you claim to have been the subject of any such action as a consequence of making your report, and the matter cannot be resolved with you by management, the matter will be referred to LPE's Chairman.

Any person found in breach of the provisions in this Policy will be subject to disciplinary procedures, up to and including the termination of your employment or engagement with LPE.

12. WHISTLEBLOWER PROTECTION OFFICER

LPE's independent HR Consultant is appointed as a Whistleblower Protection Officer with powers and duties consistent with the Australian Standard on Whistleblower Protection Programs.

13. FASLE REPORTING

A false report of a Reportable Matter could have significant effects on LPE's reputation and the reputations of other staff members and could also cause considerable waste of time and

effort. Any deliberately false reporting of a Reportable Matter, whether under this Policy or otherwise, will be treated as a serious disciplinary matter.

14. RECORDS

LPE's independent HR Consultant will maintain a record of all whistleblowing incidents and actions taken under this Policy, so that the Policy can be periodically reviewed.

15. QUESTIONS

Any questions about this Policy or Whistleblower protection issues should be directed to the LPE's independent HR Consultant.

Approved by the Board of Directors 21 May 2019.

Andrew Pierce
Chairman