

# **Ethical Reporting**



# **Our Policy**

KAW Protection Group (referred to as "KAW" in this policy) is committed to fostering a culture of transparency, accountability, and ethical reporting. This policy outlines KAW's expectations for employees to report concerns, misconduct, or potential violations in a responsible and confidential manner. KAW encourages employees to report such matters without fear of retaliation and ensures that appropriate action will be taken to address reported issues. This policy aligns with Australian standards, legal requirements, and industry best practices.

# 1. Objective:

The objective of this policy is to provide comprehensive guidelines for ethical reporting within KAW Protection Group. This policy aims to:

- a. Establish a supportive environment that encourages employees to report concerns, misconduct, or potential violations.
- b. Ensure that reported matters are promptly and thoroughly investigated in a fair and impartial manner.
- c. Protect the confidentiality of individuals involved in the reporting process, promoting a culture of trust and transparency.
- d. Prohibit retaliation against employees who make reports in good faith.
- e. Enable KAW to take appropriate action to address reported issues, ensuring compliance with applicable laws, regulations, and ethical standards.

## 2. Reporting Channels:

KAW provides multiple reporting channels to facilitate the ethical reporting process. These channels may include:

## a. Whistleblowing Hotline:

- i. Maintain a confidential and anonymous reporting mechanism, such as a dedicated whistleblowing hotline or an external third-party reporting service.
- ii. Clearly communicate the availability of the whistleblowing hotline and provide information on how to access it securely and anonymously.

# b. Reporting to Supervisors or Managers:

- i. Encourage employees to report concerns, misconduct, or potential violations to their immediate supervisors or managers.
- ii. Ensure that supervisors and managers are trained to handle reports appropriately and are knowledgeable about the escalation process.

#### c. HR or Compliance Department:

- i. Designate a specific department, such as Human Resources or Compliance, to receive and handle reports.
- ii. Provide clear guidance to employees on how to contact the designated department and the procedures for reporting concerns.

# 3. Confidentiality:

KAW recognizes the importance of maintaining the confidentiality of individuals involved in the reporting process. The following measures shall be implemented:

# a. Confidentiality:

- i. Treat all reports with the utmost confidentiality and disclose information only on a need-to-know basis for investigation purposes.
- ii. Inform employees who make reports about the confidentiality measures in place and the importance of maintaining confidentiality during the investigation process.

## b. Anonymous Reporting:

- i. Allow employees to make reports anonymously through the whistleblowing hotline or other anonymous reporting channels.
- ii. Assure employees that their identity will be protected, and that anonymity will be maintained throughout the investigation process, as permitted by law.

# c. Protection Against Retaliation:

- i. Prohibit retaliation against employees who make reports in good faith, ensuring their protection and well-being.
- ii. Clearly communicate KAW's commitment to non-retaliation and provide mechanisms for reporting any suspected retaliation.

## 4. Reporting Responsibilities and Procedures:

All employees have a responsibility to report concerns, misconduct, or potential violations. The following guidelines and procedures shall be followed:

## a. Prompt Reporting:

- i. Encourage employees to report concerns as soon as they become aware of them, without undue delay.
- ii. Emphasize the importance of early reporting to allow for timely investigation and appropriate action

# b. Reporting Process:

- i. Provide clear instructions on how to make a report, including the reporting channels, contact details, and available resources.
- ii. Ensure that the reporting process is accessible, user-friendly, and well-communicated to all employees.

#### c. Content of Reports:

- Instruct employees to provide detailed and accurate information when making a report, including the nature of the concern, individuals involved (if known), relevant dates, and supporting evidence, if available.
- ii. Encourage employees to provide sufficient context and clarity to enable effective investigation and resolution.

#### d. Non-Retaliation:

- i. Reiterate KAW's commitment to non-retaliation against employees who make reports in good faith.
- ii. Clearly communicate the available protections and the procedures for reporting any suspected retaliation.

## e. Support and Assistance:

i. Inform employees of available support and resources, such as employee assistance programs or counseling services, to help them through the reporting process.

#### 4. Investigation and Resolution Process:

KAW shall establish a robust investigation and resolution process to address reported concerns, misconduct, or potential violations. The process shall include the following steps:

# a. Initial Assessment:

- ii. Conduct an initial assessment of the reported matter to determine its credibility, significance, and urgency.
- iii. Assign the investigation to an appropriate individual or team with the necessary expertise and independence.

# b. Investigation:

- i. Conduct a thorough and impartial investigation, ensuring the principles of procedural fairness, natural justice, and due process are followed.
- ii. Gather and analyze relevant information, including interviews, document reviews, and other appropriate methods.

# c. Reporting and Documentation:

- i. Prepare a comprehensive report detailing the findings of the investigation, including any substantiated concerns, evidence, and recommended actions.
- ii. Maintain accurate and confidential records of the investigation, ensuring compliance with privacy and data protection laws.

# d. Corrective Actions and Disciplinary Measures:

- i. Take appropriate action to address reported concerns, misconduct, or potential violations.
- ii. Implement necessary corrective actions, such as training, counseling, disciplinary measures, or changes to policies and procedures, based on the investigation findings and in accordance with applicable laws and regulations.

# e. Communication and Follow-Up:

- Communicate the outcome of the investigation, to the extent possible and within legal limitations, to the individuals involved, relevant stakeholders, and appropriate authorities, as required.
- ii. Follow up with employees who made the report to provide them with feedback on the investigation outcome and any actions taken.

#### 5. Protection Against Retaliation:

KAW is committed to protecting employees who make reports in good faith. The following measures shall be implemented:

#### a. Non-Retaliation Policy:

- i. Clearly communicate KAW's policy of non-retaliation against individuals who make reports in good faith.
- ii. Prohibit any form of retaliation, including adverse employment actions, harassment, or victimization.

#### b. Confidentiality and Anonymous Reporting:

- i. Reinforce the confidentiality measures in place to protect the identity of employees making reports.
- ii. Encourage employees to report any suspected retaliation, ensuring that appropriate action is taken promptly.

# 6. Awareness and Training:

KAW shall provide regular training and awareness programs on ethical reporting. This includes:

# a. Training on Reporting Procedures:

- i. Provide training to employees on the reporting channels, procedures, and their rights and responsibilities in making reports.
- ii. Ensure employees understand the importance of ethical reporting, the protections available, and the consequences of making false reports.

# b. Awareness Campaigns:

- i. Conduct periodic awareness campaigns to promote ethical reporting, emphasizing KAW's commitment to transparency, accountability, and non-retaliation.
- ii. Utilize various communication channels, such as newsletters, intranet portals, posters, and training sessions, to disseminate information and raise awareness.

KAW Protection Group.