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Policy Grouping:	Corporate Governance	Updated:	24-Feb-2020
Title:	Whistleblower Policy	Version:	2.3
Policy Owner:	Board Of Directors	Supersedes:	17-Dec-2019

1.0 INTRODUCTION

The Board of Ovato Limited (“Ovato”) is committed to ensuring that Ovato, and all its officers and employees, act at all times in compliance with all laws, and in compliance with Ovato’s ethical standards, as set out in its Code of Conduct. ([Ovato Code Of Conduct.pdf](#)).

The Board recognises that any genuine commitment to detecting and preventing illegal and other undesirable conduct must include, as a fundamental cornerstone, a mechanism whereby employees and others can report their concerns freely and without fear of repercussion.

2.0 PURPOSE

This Whistleblower Policy (Policy) has been adopted to ensure that people can raise concerns regarding actual or suspected contravention of our ethical and legal standards without fear of reprisal or feeling threatened by doing so.

This Policy aims to:

- encourage people to report an issue of wrongdoing if they genuinely believe someone has contravened Ovato’s Code of Conduct, Ovato’s policies or the law;
- to ensure individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported;
- outline how Ovato will promptly and properly deal with all reported wrongdoing, misconduct or unethical behaviour;
- provide transparency around Ovato’s framework for receiving, handling and investigating reports;
- assist in ensuring that serious misconduct or unethical behaviour is identified and dealt with appropriately.
- to support Ovato’s values and Code of Conduct, and assist in meeting Ovato’s legal and regulatory obligations;

3.0 APPLICATION OF POLICY AND RESPONSIBILITY FOR COMPLIANCE

This Policy applies to:

- All current and former Directors, employees and officers of Ovato, whether full time, part time or permanent or casual at any level of seniority wherever employed.
- All current and former suppliers and their employees, contractors, contractors’ employees, consultants, advisers, service providers and other business partners.
- All associates of Ovato.
- A relative, dependant or spouse of current and former Directors, employees and officers of Ovato, whether full time, part time or permanent or casual at any level of seniority wherever employed.
- A relative, dependant or spouse of current and former employees, contractors, consultants, service providers, suppliers and business partners).

All individuals and entities included in the above categories are responsible for compliance with this Policy.

All individuals and entities included in the above categories, who make a report, are defined as “Eligible Whistleblowers” and qualify for protection under the relevant provisions of the Corporations Act.

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4.0 ACCESSIBILITY OF WHISTLEBLOWER POLICY

Ovato's Whistleblower Policy is made generally accessible to all Ovato's officers and employees:

- On the Ovato Intranet site.
- On the Ovato external website.
- On staff noticeboards.
- At Employee Induction sessions.
- In hard or soft copy, from the Chief People Officer, Group Assurance Manager or your direct Manager.

In addition, periodic staff briefing sessions or presentations may be held to actively promote awareness and understanding of Ovato's Whistleblower Policy for all staff.

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5.0 WHAT SORT OF CONCERNS SHOULD BE REPORTED ?

5.1 Disclosable Matters

All employees are encouraged to report any genuine matters, behaviours or other perceived wrongdoings, that they honestly believe contravene Ovato's Code of Conduct, Ovato's policies or the law. For the purposes of making a report under this Policy, matters may include any actual or suspected:

- conduct or practices which are illegal or breach any legal or regulatory requirements;
- breach of any of Ovato's policies;
- fraud, money laundering or misappropriation of funds;
- corrupt activities such as offering or accepting a bribe;
- financial irregularities;
- significant or repeated mismanagement or waste of funds or resources
- illegal conduct, such as theft, dealing in, or use of illicit drugs, violence or threatened violence, and criminal damage against property;
- abuse of authority;
- undisclosed conflicts of interest;
- serious harm to public health, safety or environment, or to the health and safety of any Ovato employee or other individual involved in Ovato's business;
- any actual or threatened, action taken against, or harm suffered by, an employee or other individual, as a result of planning to, or actually making a report under this Policy.

The above matters are classified as "Disclosable Matters" and qualify an Eligible Whistleblower for legal protection under the relevant provisions of the Corporations Act.

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5.2 Matters Excluded From Reporting To The Whistleblower Service

Certain matters should not be reported through the Whistleblower Service, and do not generally qualify for protection under the relevant provisions of the Corporations Act.

These include personal work-related grievances that relate to the discloser's current or former employment and have, or tend to have, implications for the discloser personally, but do not:

- Have any other significant implications for Ovato (or another entity); or
- Relate to any conduct, or alleged conduct, about a Disclosable Matter (refer s5.1).

Examples of personal work-related grievances which should not be reported through the Whistleblower Service, may include, but not be limited to:

- An interpersonal conflict between the discloser and another employee;
- A decision that does not involve a breach of workplace laws;
- A decision about the engagement, transfer or promotion of the discloser;
- A decision about the terms and conditions of engagement of the discloser; or
- A decision to suspend or terminate the engagement of the discloser, or otherwise to discipline the discloser.

However, there are certain circumstances in which a personal work-related grievance may still qualify for protection under the relevant provisions of the Corporations Act if:

- It includes information about misconduct, or information about misconduct includes or is accompanied by a personal work-related grievance (a mixed report);
- Ovato has breached employment or other laws punishable by imprisonment for a period of 12 months or more, or has engaged in conduct that represents a danger to the public, or if the disclosure relates to information that suggests misconduct beyond the discloser's personal circumstances;
- The discloser suffers from or is threatened with detriment for making a disclosure
- The discloser seeks legal advice or legal representation about the operation of the whistleblower protections under the Corporations Act.

Where an employee does have a personal work-related grievance, or another type of issue or concern which should not be reported through the Whistleblower Service, the employee should report the grievance internally to their direct Manager or Supervisor, OHSE Officer, Human Resources Manager or General Manager (or equivalent), in accordance with Ovato's existing grievance procedures.

In this case, and employees may also wish to seek legal advice about their rights and protections under employment or contract law, and to resolve their personal work-related grievance.

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6.0 HOW DO YOU MAKE A WHISTLEBLOWER DISCLOSURE ?

6.1 Who Can You Talk To, For Information Prior To Making A Disclosure ?

If you become aware of any matter, behaviour or wrongdoing that you think contravenes Ovato's Code of Conduct, Ovato's policies or the law, and you consider making a whistleblower disclosure, but you wish to obtain more information prior to making a disclosure, then you can contact:

- The Ovato Chief People Officer;
- The Ovato Group Assurance Manager;
- The Ovato Company Secretary and General Counsel;
- Your external Legal Adviser.

6.2 Who Can You Talk To, Or Contact, To Make A Disclosure ?

If you become aware of any matter, behaviour or wrongdoing that you think contravenes Ovato's Code of Conduct, Ovato's policies or the law, then you should:

- Take the matter up with your immediate supervisor or manager;
- Report the matter to any of the following Ovato management, either verbally, by telephone, by email, by letter or by internal memorandum:
 - Ovato Chief People Officer;
 - Ovato Group Assurance Manager;
 - Ovato Company Secretary and General Counsel;
 - Ovato Chief Executive Officer;
- Report the matter anonymously to the Chair of the Audit and Risk Management Committee via the externally managed Whistleblower Service on either:
 - The Ovato intranet ([Whistleblower Hotline](#))
 - The Ovato Whistleblower Telephone Hotline on 1300 582 346.

The external option is provided to enable anonymous disclosures, which helps ensure that Ovato employees, or individuals external to Ovato (e.g. former employees, and current and former suppliers), who are not comfortable making a disclosure internally, or feel it is inappropriate to do so, can still make a disclosure to Ovato, via the externally managed Whistleblower Service.

Ovato values all disclosures and emphasises that all employees, and other individuals, should not be deterred by barriers such as threat of detriment.

6.3 Eligible Recipients For Ovato

The recipients specifically identified in s6.2 above are classified as "Eligible Recipients" for Ovato. Where an Eligible Whistleblower makes a report of a Disclosable Matter, it must be made directly to an Eligible Recipient, to qualify for legal protection under the relevant provisions of the Corporations Act.

An Eligible Recipient for Ovato is further defined as:

- An officer or senior manager of Ovato or a related body corporate;
- The Ovato Group Assurance Manager and the Ovato External Auditor (Deloitte) (including a member of an audit team conducting an audit) or the actuary of Ovato, or a related body corporate;
- A person authorised by the entity to receive disclosures that may qualify for protection.

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6.4 Public Interest Disclosures And Emergency Disclosures

In the case of a disclosures considered to be a Public Interest or Emergency Disclosure, this can be made to a journalist or parliamentarian under certain circumstances, and qualify for protection under the relevant provisions of the Corporations Act.

Definitions of Public Interest Disclosures and Emergency Disclosures can be found in ASIC Regulatory Guide 270 entitled “Whistleblower Policies” at sections RG270.75 and RG270.76 respectively.

7.0 LEGAL PROTECTIONS FOR DISCLOSERS

7.1 Protection As A Whistleblower Under The Corporations Act

Under this Policy, any Ovato employee or other individual who makes a disclosure qualifies for protection as a whistleblower under the Corporations Act if:

- They are an “Eligible Whistleblower” in relation to Ovato;
- They have made a disclosure of information relating to a “Disclosable Matter” directly to an “Eligible Recipient”, or to ASIC, APRA or another Commonwealth body prescribed by regulation;
- They have made a disclosure to a legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the whistleblower provisions in the Corporations Act;
- They have made an “Emergency Disclosure” or “Public Interest Disclosure”.

7.2 Anonymous Disclosures - Protection As A Whistleblower Under The Corporations Act

Any disclosures made anonymously via any of the contact channels noted in s6.2 are still subject to the same protections under the relevant provisions of the Corporations Act:

7.3 Whistleblower Protection Officer

Ovato has a nominated Whistleblower Protection Officer, who is responsible for protecting and safeguarding disclosers and ensuring the integrity of the Whistleblower reporting mechanism.

The primary Whistleblower Protection Officer is the Chief People Officer, and the secondary Whistleblower Protection Officer being the Company Secretary and General Counsel.

7.4 Identity Protection (Confidentiality)

All officers and employees of Ovato are legally obliged to protect the confidentiality of a discloser’s identity, if known. This Policy affords the discloser the following identity protections:

- A discloser can choose to remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised.
- A discloser can refuse to answer questions that they feel could reveal their identity at any time, including during follow-up conversations.
- If desired by a discloser who wishes to remain anonymous, they should maintain ongoing two-way communication with the Whistleblower Contact, so the Whistleblower Contact can ask follow-up questions or provide feedback.

			
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The protections afforded by this Policy apply not only to internal disclosures, but to disclosures to legal practitioners, regulatory and other external bodies, and public interest and emergency disclosures that are made in accordance with the Corporations Act.

It is illegal for a person to identify a discloser, or disclose information that is likely to lead to the identification of the discloser, (which they have obtained directly or indirectly because the discloser made a disclosure that qualifies for protection). However, the exceptions to this provision are if a person discloses the identity of the discloser:

- To ASIC, APRA, or a member of the Australian Federal Police (within the meaning of the Australian Federal Police Act 1979);
- To a legal practitioner (for the purposes of obtaining legal advice or legal representation about the whistleblower provisions in the Corporations Act);
- To a person or body prescribed by regulations;
- With the consent of the discloser.

A person can disclose the information contained in a disclosure with or without the discloser's consent if:

- The information does not include the discloser's identity;
- The Whistleblower Protection Officer and Whistleblower Investigation Officer have taken all reasonable steps to reduce the risk that the discloser will be identified from the information;
- It is reasonably necessary for investigating the issues raised in the disclosure.

A discloser can lodge a complaint about a breach of confidentiality:

- Internally within Ovato, to the Whistleblower Protection Officer, the Whistleblower Investigation Officer or the Company Secretary & General Counsel.
- An external regulator, such as ASIC, APRA or the ATO, for further investigation.

7.5 Protection from Detrimental Acts or Omissions

The Whistleblower Protection Officer is legally obliged to protect the discloser, or any other person, from detrimental acts in relation to a disclosure. This Policy affords the discloser, or any other person, the following protections from detrimental acts or omissions in relation a disclosure:

- A person cannot engage in conduct that causes detriment to a discloser (or another person), in relation to a disclosure, if:
 - The person believes or suspects that the discloser (or another person) made, may have made, proposes to make, or could make, a disclosure that qualifies for protection;
 - The belief or suspicion is the reason, or part of the reason, for the conduct.
- A person cannot make a threat to cause detriment to a discloser (or another person) in relation to a disclosure. A threat may be express or implied, or conditional or unconditional.
- A discloser (or another person) who has been threatened in relation to a disclosure does not have to actually fear that the threat will be carried out.

			
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A Detrimental Act, or detrimental conduct is defined as including, but not limited to, the following:

- Dismissal of an employee;
- Injury of an employee in his or her employment;
- Alteration of an employee's position or duties to his or her disadvantage;
- Discrimination between an employee and other employees of the same employer;
- Harassment or intimidation of a person;
- Harm or injury to a person, including psychological harm;
- Damage to a person's property;
- Damage to a person's reputation;
- Damage to a person's business or financial position; or
- Any other damage to a person.

Detrimental Acts, or detrimental conduct excludes the following:

- Administrative action that is reasonable for the purpose of protecting a discloser from detriment (e.g. moving a discloser who has made a disclosure about their immediate work area to another office to prevent them from detriment);
- Managing a discloser's unsatisfactory work performance, if the action is in line with the entity's performance management framework.

7.6 Compensation and Other Remedies

A discloser (or any other employee or person) can seek compensation and other remedies, through the courts if, they have suffered detrimental acts or omissions, and:

- They suffer loss, damage or injury because of a disclosure;
- The Whistleblower Protection Officer and Whistleblower Investigation Officer, or any other officer or employee of Ovato, have failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

If such cases arise, then the Whistleblower Protection Officer or Company Secretary and General Counsel encourage disclosers (or any other employee or person so impacted) to seek independent legal advice.

7.7 Civil, Criminal and Administrative Liability Protection

This Policy affords protection to a discloser from any of the following matters arising in relation to their disclosure:

- Civil liability (e.g. any legal action against the discloser for breach of an employment contract, duty of confidentiality or another contractual obligation);
- Criminal liability (e.g. attempted prosecution of the discloser for unlawfully releasing information, or other use of the disclosure against the discloser in a prosecution (other than for making a false disclosure));
- Administrative liability (e.g. disciplinary action for making the disclosure).

However, these protections do not grant immunity from liability for any misconduct a discloser has engaged in that is revealed in their disclosure.

			
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8.0 SUPPORT AND PRACTICAL PROTECTION FOR DISCLOSERS

You will not be discriminated against or disadvantaged in your employment with Ovato for making a report in accordance with this Policy, nor will you receive reprisals due to your actions in making a report. The Whistleblower Protection Officer will take all reasonable steps to ensure that adequate and appropriate protection is being provided for those who, in good faith, make a report. This protection applies if the matter is proven or not, regardless of whether it is reported to an external authority.

In addition to the legal protections afforded to protect disclosers (or any other employee or person) from detrimental acts or omissions as a result of making a disclosure, (s7.5), the Whistleblower Protection Officer, and any other involved officer or employee of Ovato, will consider the following measures and mechanisms to offer further support and practical protection (as appropriate for the specific circumstances of the disclosure):

- Processes for assessing the risk of detriment against a discloser and other persons (e.g. other staff who might be suspected to have made a disclosure), which will commence as soon as possible after receiving a disclosure;
- Support services (including internal or external counselling or other professional or legal services) that are available to disclosers;
- Strategies to help a discloser minimise and manage stress, time or performance impacts, or other challenges resulting from the disclosure or its investigation;
- Actions for protecting a discloser from risk of detriment—for example, management may allow the discloser to perform their duties from another location, reassign the discloser to another role at the same level, make other modifications to the discloser’s workplace or the way they perform their work duties, or reassign or relocate other staff involved in the disclosable matter;
- Processes for ensuring that operational and functional management are aware of their responsibilities to maintain the confidentiality of a disclosure, address the risks of isolation or harassment, manage conflicts, and ensure fairness when managing the performance of, or taking other management action relating to, a discloser;
- Procedures on how a discloser can lodge a complaint if they have suffered detriment, and the actions the Whistleblower Protection Officer may take in response to such complaints (e.g. the complaint could be investigated as a separate matter by an officer who is not involved in dealing with disclosures and the investigation findings will be provided to the Board of Directors, or Audit And Risk Management Committee);
- Interventions for protecting a discloser if detriment has already occurred—for example, the Whistleblower Protection Officer could investigate and address the detrimental conduct, such as by taking disciplinary action, or allow the discloser to take extended leave, develop a career development plan for the discloser that includes new training and career opportunities, or offer compensation or other remedies.

9.0 GOOD FAITH AND MISLEADING DISCLOSURES

Whistleblowing is not about airing a grievance. It’s about reporting real or perceived malpractice. A report may damage the career prospects and reputation of people who are the subject of serious allegations and therefore if your report is not made in good faith or is found to be malicious, deliberately misleading, frivolous or otherwise knowledgeably false, you may be subject to disciplinary action, which may include, but not be limited to, termination of employment.

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10.0 WHAT HAPPENS AFTER A REPORT IS MADE ? (HANDLING AND INVESTIGATING A DISCLOSURE)

10.1 Whistleblower Protection Officer

Ovato has a nominated Whistleblower Investigation Officer, who is responsible for protecting and safeguarding disclosers and ensuring the integrity of the Whistleblower reporting mechanism.

The primary Whistleblower Investigation Officer is the Group Assurance Manager, and the secondary Whistleblower Investigation Officer being the Company Secretary and General Counsel.

10.2 All Disclosures

The Whistleblower Investigation Officer, and, if appropriate, other selected managers, will investigate all reported concerns appropriately and will, where applicable, take the necessary course of action in response to a report and provide feedback regarding the investigation's outcome.

The Whistleblower Investigation Officer will, to the fullest extent practical, maintain transparency about how they handle and investigate disclosures, including timeframes for handling and investigating disclosures.

For all disclosures, the Whistleblower Investigation Officer will:

- Ensure the confidentiality of its disclosure handling and investigation process.
- Ensure appropriate records and documentation for each step in the process are maintained.

10.3 Receipt Of A Disclosure

On receipt of a disclosure the Whistleblower Investigation Officer will:

- Acknowledge the discloser after receiving their disclosure.
- Initially assess the disclosure to determine whether:
 - It qualifies for protection under the provisions of the Corporations Act:
 - A formal, in-depth investigation is required.

10.4 Investigating A Disclosure

Where investigating a disclosure, the Whistleblower Investigation Officer, and, if appropriate, other selected managers, will:

- Determine the nature and scope of the investigation;
- Determine the person(s) within and/or outside the entity that should lead the investigation;
- Determine the nature of any technical, financial or legal advice that may be required to support the investigation;
- Determine the timeframe for the investigation (which may vary depending on the nature of the disclosure).
- If the discloser can be contacted (including through anonymous channels), provide the discloser with regular updates during the key stages, such as:

			
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- When the investigation process has begun;
- While the investigation is in progress;
- After the investigation has been finalised.

The Whistleblower Investigation Officer, and, if appropriate, other selected managers, will make every effort to follow best practice in investigations. To ensure objectivity, fairness and independence, investigations will be performed by person(s) fully independent of the discloser, the individuals who are the subject of the disclosure, and the department or business unit involved. Investigations will be performed jointly with an external investigation firm, if required (e.g. when additional specialist skills or expertise are necessary).

It should be noted that Ovato acknowledges the limitations of its investigation process, in particular where it may not be able to undertake an investigation if it is not able to contact the discloser (e.g. if a disclosure is made anonymously and the discloser has refused to provide, or has not provided, a means of contacting them).

10.6 Protecting The Identity Of The Discloser

Without the discloser's consent, Ovato or any one of its officers acting in their capacity as such under this Policy, cannot legally disclose information that is likely to lead to the identification of the discloser as part of its investigation process, unless:

- The information does not include the discloser's identity;
- Ovato or any one of its officers acting in their capacity as such under this Policy, removes information relating to the discloser's identity or other information that is likely to lead to the identification of the discloser (e.g. the discloser's name, position title and other identifying details);
- It is reasonably necessary for investigating the issues raised in the disclosure.

10.7 Reporting The Results Of The Investigation

On completion of an investigation, a final report will be issued to the Chair of the Audit and Risk Management Committee, the Ovato Chief Executive Officer, and any other senior executive or manager that the Ovato Chief Executive Officer deems relevant.

A written or verbal summary of the findings and conclusions of the investigation will also be reported to the discloser, if they request.

The report will not be disclosed to anyone except those that are actively involved in investigating the matters raised in the report.

It should also be noted that:

- The method for documenting and reporting the findings will depend on the nature of the disclosure.
- There may be circumstances where it may not be appropriate to provide details of the outcome to the discloser.

			
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11.0 ENSURING FAIR TREATMENT OF INDIVIDUALS MENTIONED IN A DISCLOSURE

The Whistleblower Protection Officer will take all possible steps for ensuring fair treatment of individuals mentioned in a disclosure. This may include, but not be limited to, the following measures and/or mechanisms, dependent on the specific circumstances of the disclosure:

- Disclosures will be handled confidentially, when it is appropriate in the circumstances;
- Each disclosure will be assessed and may be the subject of an investigation;
- The objective of an investigation is to determine whether there is enough evidence to substantiate or refute the matters reported;
- When an investigation is undertaken, the process will be objective, fair and independent;
- An employee who is the subject of a disclosure will be advised about the nature of the disclosure as and when required by principles of natural justice and procedural fairness and prior to any actions being taken eg. if the disclosure will be subject to investigation;
- An employee who is the subject of a disclosure may contact Ovato's support services (e.g. Employee Assistance Programme, human resources counselling, legal counsel).

12.0 OVERSIGHT AND MONITORING OF WHISTLEBLOWER POLICY BY BOARD OF DIRECTORS AND EXECUTIVE MANAGEMENT

12.1 Reporting Of Whistleblower Disclosures And Whistleblower Activity

Whistleblower activity will be summarily reported to the Audit And Risk Management Committee at its quarterly meetings, including periods where no Whistleblower activity has occurred.

Where a disclosure has been made, a summary report for each disclosure will be made to the Committee. It is emphasised that such reports **MUST** preserve the anonymity of the disclosure, unless specific authority has been received from the discloser to publish their identity. These reports may include, but not be limited to, the following:

- The subject matter;
- The status of the matter;
- The type of person who made the disclosure (e.g. employee or supplier) and their status (e.g. whether they are still employed or contracted by the entity);
- The action taken;
- How the disclosure was finalised;
- The timeframe for finalising the disclosure;
- The outcomes and subsequent actions.

12.2 Review Of Content And Effectiveness Of Whistleblower Policy

The Whistleblower Policy will be reviewed every 2 years, or more often if changes to applicable legal and regulatory instruments arise in the intervening periods.

Initial reviews will be performed by the Ovato Group Assurance Manager and Ovato Company Secretary & General Counsel. Recommended amendments will be presented to the Audit And Risk Management Committee for review and approval.

Once approved by the Audit And Risk Management Committee, the amended Policy will then be re-published on the Ovato Intranet, Ovato External Website, and redistributed to internally to be made accessible to all staff, in accordance with s4.0.

			
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APPENDIX 1 ROLES AND RESPONSIBILITIES UNDER THIS POLICY

The following positions within the organisational structure of Ovato Limited have the following responsibilities for supporting Ovato's Whistleblower Policy:

Position	Responsibilities Under This Policy
Audit And Risk Management Committee	<p>'Eligible Recipient' for receiving disclosures directly from disclosers.</p> <p>Owner of the Whistleblower Policy, responsible for oversight and monitoring of the Policy.</p> <p>Responsible for approving updates to the Policy, processes and procedures.</p>
Chief Executive Officer	<p>'Eligible Recipient' for receiving disclosures directly from disclosers.</p> <p>Ultimately responsible for decisions on actions to taken to investigate, respond to and remediate, matters arising from disclosures.</p>
Company Secretary And General Counsel	<p>'Eligible Recipient' for receiving disclosures directly from disclosers.</p> <p>Provision of legal advice to both Ovato, and the discloser.</p> <p>May assist the entity with specific investigations.</p> <p>Secondary 'Whistleblower Protection Officer', responsible for protecting or safeguarding disclosers and ensuring the integrity of the reporting mechanism.</p>
Chief People Officer	<p>Primary 'Whistleblower Protection Officer', responsible for protecting or safeguarding disclosers and ensuring the integrity of the reporting mechanism.</p> <p>Able to exercise independent judgement, and has a mechanism in place to escalate problems directly to Ovato's Board.</p> <p>'Eligible Recipient' for receiving disclosures directly from disclosers.</p> <p>May assist Ovato with specific investigations.</p> <p>Supports training, education and communications about the Policy.</p>
Group Assurance Manager	<p>Primary 'Whistleblower Investigation Officer', responsible for investigating disclosures.</p> <p>'Eligible Recipient' for receiving disclosures directly from disclosers.</p> <p>Able to exercise independent judgement, and has a mechanism in place to escalate problems directly to Ovato's Board.</p> <p>A contact point where employees can seek accurate and confidential advice or information about the following, without making a disclosure:</p> <ul style="list-style-type: none"> • How the Whistleblower Policy works; • What the Policy covers; • How a disclosure might be handled. <p>Supports training, education and communications about the Policy.</p> <p>Responsible for periodic reviews and updates of the Policy, processes and procedures, and for implementing and overseeing any changes.</p> <p>Reporting of whistleblower activity to the Audit And Risk Management Committee and Executive Management Team.</p>

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APPENDIX 1 ROLES AND RESPONSIBILITIES UNDER THIS POLICY (continued)

Other Executive Management	May assist Ovato with specific investigations.
Grant Thornton	An independent whistleblowing service provider that Ovato has authorised to directly receive disclosures.
Other External Service Providers	Investigation firms and financial, legal and other advisers that Ovato may engage to assist with investigating disclosures.