

# Whistleblower Policy

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## 1. Overview

At Cancer Trials Australia (CTA) we are guided by our company values. These values are the foundation of how we conduct ourselves and interact with each other, our clients, members, suppliers and other stakeholders. CTA is committed to ensuring corporate compliance and promoting ethical corporate culture by observing the highest standards of fair dealing, honesty and integrity in our business activities.

## 2. Purpose

The policy has been put in place to ensure any concerns raised regarding any misconduct or improper state of affairs or circumstances in relation to CTA are dealt with effectively, securely, appropriately, and in accordance with the *Corporations Act 2001* (Cth) (the Act).

CTA encourages the reporting of any instances of suspected unethical, illegal, corrupt, fraudulent or undesirable conduct involving CTA in accordance with this policy. Protections and measures will be provided by CTA to individuals who make a disclosure under this policy without fear of victimisation or reprisal.

This policy will be provided to all employees, contractors, officers and internship students of CTA upon commencement of their employment or engagement.

This policy is also available to persons outside the organisation and can be accessed on CTA's website.

CTA may invite employees, contractors, officers and internship students to attend training sessions to ensure ongoing education regarding the application of this policy.

CTA may unilaterally vary, remove or replace this policy at any time. This policy should be read in connection with CTA's Code of Conduct.

## 3. Scope and Application

This policy applies to:

- (a) CTA; and
- (b) Eligible Whistleblowers (defined below) in relation to CTA.

## 4. Definitions

**4.1 Detrimental Conduct** includes actual or threatened conduct such as the following (without limitation):

- (a) termination of employment;
- (b) injury to employment including demotion, disciplinary action;
- (c) alternation of position or duties to the employee's disadvantage;
- (d) discrimination between the employee and other employees;
- (e) harassment, bullying or intimidation;
- (f) victimisation;
- (g) harm or injury including psychological harm;
- (h) damage to a person's property;
- (i) damage to a person's reputation;
- (j) damage to a person's business or financial position; or
- (k) any other damage to a person.

**4.2 Disclosable Conduct** means anything which an Eligible Whistleblower has reasonable grounds to suspect constitutes misconduct or an improper state of affairs or circumstances in relation to CTA or a related body corporate of CTA, including where an Eligible Whistleblower suspects that CTA or a related body corporate (or officers or employees of CTA or a related body corporate) has engaged in conduct which:

- (a) is a breach of, or constitutes an offence against, any laws or regulations or is otherwise unlawful (including illegality such as theft, dealing in or use of illicit drugs, violence or threatened violence and criminal damage to property);
- (b) is dishonest, fraudulent or corrupt;
- (c) is unethical or otherwise breaches any of CTA's policies such as the Code of Conduct, and any policies which relate to discrimination, harassment, bullying, workplace violence, vilification or victimisation;
- (d) is oppressive or grossly negligent;
- (e) is potentially damaging to CTA;
- (f) represents a danger to the public or the financial system; or
- (g) is prescribed as such by the law.

**4.3 Eligible Recipient** means any of the following:

- (a) an officer or senior manager of CTA or a related body corporate;
- (b) an auditor, or member of an audit team conducting an audit, of CTA or a related body corporate;
- (c) an actuary of CTA or a related body corporate;
- (d) CTA's Whistleblower Protection Officers;
- (e) CTA's externally managed complaints handling service, Integrity Line;
- (f) a legal practitioner for the purpose of obtaining legal advice; or
- (g) any other individual prescribed by the law.

**4.4 Eligible Whistleblower** means any person who is, or has been, any of the following with respect to CTA:

- (a) an employee, including permanent, fixed term and casual;
- (b) an intern student;
- (c) an officer;
- (d) a director;
- (e) a contractor (including sub-contractors and employees of contractors);
- (f) a supplier (including employees of suppliers);
- (g) an auditor (including members of an audit team);
- (h) an actuary;
- (i) an associate (within the meaning of the Act); and
- (j) relative, dependents, spouse, or dependents of a spouse of any of the above.

**4.5 Personal Work-related Grievance** means a grievance:

- (a) about any matter in relation to the Eligible Whistleblower's current or former employment with CTA which has (or tends to have) implications only for the Eligible Whistleblower;
- (b) which does not have significant implications for CTA except as they relate to the Eligible Whistleblower; and
- (c) that does not concern conduct or alleged conduct that is in breach of, or an offence against laws or regulations, is a danger to the public or financial system, or is otherwise prescribed by law as mentioned in the definition of Disclosable Conduct.

Examples of Personal Work-related Grievances include:

- (d) interpersonal conflict between the Eligible Whistleblower and another employee of CTA;
- (e) decisions relating to the Eligible Whistleblower's engagement, termination, suspension, transfer or promotion of employment or other disciplinary matters.

**4.6 Protected Disclosure** means a report or disclosure by an Eligible Whistleblower to an Eligible Recipient (or another recipient described in this policy) about Disclosable Conduct in CTA's workplace or business activities, but does not include reports about a Personal Work-related Grievance.

## 5. Disclosable Conduct

Under this policy, Eligible Whistleblowers may make a report or disclosure to an Eligible Recipient about Disclosable Conduct (i.e. a Protected Disclosure).

CTA encourages Eligible Whistleblowers to make Whistleblower Disclosures internally to a **Whistleblower Protections Officer** (see below) if appropriate, or via our externally managed complaints handling service, **Integrity Line**.

Any disclosures that do not fall within the definition of Disclosable Conduct will not be Protected Disclosures and will therefore not qualify for protection under the Act.

If you are unsure if your information relates Disclosable Conduct, you can contact one of CTA's Whistleblower Protection Officers (see below).

If your information relates to a Personal Work-related Grievance or any other inappropriate workplace conduct that is not Disclosable Conduct, it should be reported to your Manager, People and Culture or in accordance with CTA's Grievance Handling Policy and Procedure.

## 6. Making a Disclosure

CTA relies on its employees maintaining a culture of honest and ethical behaviour. Accordingly, if you become aware of any Disclosable Conduct, it is expected that you will make a disclosure under this policy.

There are several ways in which you may report or disclose any issue or behaviour which you consider to be Disclosable Conduct.

### 6.1 Internal Reporting

You may disclose any Disclosable Conduct to the Whistleblower Protection Officers listed below:

#### Chief Executive Officer

Kurt Lackovic  
0439 352 455  
Kurt.Lackovic@ctaust.org

#### People and Culture Manager

Kimberley Varrasso  
0422 393 497  
Kimberley.Varrasso@ctaust.org

#### Finance Manager

Annelise Tedesco  
0400 311 727  
Annelise.Tedesco@ctaust.org

You can make a disclosure outside of business hours by contacting the above Whistleblower Protection Officers via phone call or email.

You are also encouraged to contact the above Whistleblower Protection Officers to obtain any additional information you may require before making a disclosure or for any clarification regarding this policy.

If you are unable to use any of the above reporting channels, or feel that doing so would not be appropriate, a disclosure can be made to another Eligible Recipient for CTA, including:

- (a) directors;
- (b) senior managers;
- (c) auditor(s) or member of an audit team conducting an audit of CTA; or
- (d) an actuary of CTA (an external professional in risk management).



The Whistleblower Protection Officer or eligible recipient will safeguard your interests and will ensure the integrity of the reporting mechanism.

## 6.2 External Reporting

Where you do not feel comfortable making an internal report, or where you have made an internal report, but no action has been taken within a reasonable time, you may disclose any Disclosable Conduct to CTA's external independent whistleblower service, **Integrity Line** by either phoning 1800 468 456 during business hours or via making an online report at [integrityline.com.au](https://integrityline.com.au).

Your call will not be recorded and the person taking your call is not associated with CTA in any way. They are trained specialists dedicated to dealing with whistleblowers and their concerns.

**Integrity Line** will prepare a report which details the concerns raised by you to CTA's designated Whistleblower Protection Officer. Any information contained in the report will be kept confidential, except as required by law or where disclosure is necessary to regulatory authorities, law enforcement agencies or professional advisors to CTA.

Integrity Line offers phone reporters the option to:

- (a) Be fully anonymous, which may limit CTA's ability to act on the matter.
- (b) Be partially anonymous, where Integrity Line can manage communication on behalf of the reporter and CTA.
- (c) Not anonymous, where the reporter is aware that their details will be passed onto CTA.

## 6.3 Anonymity

When making a disclosure, you may do so anonymously. It may be difficult for CTA to properly investigate the matters disclosed if a report is submitted anonymously and therefore CTA encourages you to share your identity when making a disclosure, however you are not required to do so.

Where a disclosure has been made externally and you provide your contact details, those contact details will only be provided to a Whistleblower Protection Officer with your consent.

## 6.4 Reporting to Regulators

You may also make a disclosure to the Australian Securities and Investments Commission (ASIC) or the Australian Prudential Regulation Authority (APRA) in relation to a Disclosable Conduct. Such a disclosure will also be a Protected Disclosure for the purposes of the Act and this policy.

## 6.5 Reporting to a Legal Practitioner

You may choose to discuss your concerns with a legal practitioner for the purposes of obtaining legal advice or representation in relation to the operation of the whistleblower provisions in the Act. Such a disclosure will also be a Protected Disclosure for the purposes of the Act and this policy.

## 6.6 Public Interest and Emergency Disclosure

In certain situations, the conduct or wrongdoing may be of such gravity and urgency that disclosure to the media or a parliamentarian is necessary. It is recommended that you contact an independent legal advisor prior to making any public interest or emergency disclosure.

A public interest and emergency disclosure can only be made to:

- (a) a journalist, defined to mean a person who is working in a professional capacity as a

journalist for a newspaper, magazine, or radio or television broadcasting service; or

- (b) a Member of the Parliament of the Commonwealth or of a State or Territory parliament.

You may only make a 'public interest disclosure' if:

- (c) you have previously disclosed the information to ASIC or APRA;
- (d) at least 90 days has passed since the previous disclosure was made;
- (e) you do not have reasonable grounds to believe that action is being taken to address the matters which you have disclosed;
- (f) you have reasonable grounds to believe that making a further disclosure to a journalist or member of parliament would be in the public interest;
- (g) you have given written notification, including sufficient information to identify the previous disclosure to the authority to which the previous disclosure was made that you intend on making a public interest disclosure; and
- (h) the extent of information disclosed is no greater than is necessary to inform the recipient of the misconduct, an improper state of affairs or circumstances, or a breach of the law.

You may only make an 'emergency disclosure' if:

- (i) you have previously disclosed the information to ASIC or APRA;
- (j) you have reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons, or to the natural environment;
- (k) you have given written notification, including sufficient information to identify the previous disclosure to the authority to which the previous disclosure was made that you intend on making an emergency disclosure; and
- (l) the extent of information disclosed is no greater than is necessary to inform the recipient of the substantial and imminent danger.

## 7. Investigation

CTA will treat all Protected Disclosures seriously and sensitively. The Whistleblower Protection Officer will assess and consider all reports promptly to determine whether the matter should be investigated. The investigation process will vary depending on the nature of the report and the severity of allegations made.

The Whistleblower Protection Officer will, in their discretion, determine whether:

- (a) the disclosure is a Protected Disclosure and therefore qualifies for protection under this policy and the Act;
- (b) whether it is appropriate to commence an investigation into the matter; and
- (c) whether any investigation is better undertaken internally, by the Whistleblower Protection Officer, or externally, by an independent investigator.

All investigations will be conducted in a fair, independent and timely manner.

Unless you have consented to your identity being disclosed, the Whistleblower Protection Officer, or other person investigating the Protected Disclosure under this policy, will take all reasonable steps to reduce the risk that the Eligible Whistleblower will be identified as a result of the Protected

Disclosure. Where you have consented to your identity being shared, CTA will still make all reasonable efforts to preserve confidentiality during the investigation.

If the report is not anonymous, the Whistleblower Protection Officer or external investigator will contact you, by your preferred method of communication to discuss the investigation process and any other matters that are relevant to the investigation.

Where you have chosen to remain anonymous, your identity will not be disclosed to the investigator or to any other person and CTA will conduct the investigation based on the information provided to it.

Where possible, the Whistleblower Protection Officer will provide you with feedback on the progress and expected timeframes of the investigation. The person against whom any allegations have been made will also be informed of the concerns and will be provided with an opportunity to respond (unless there are any restrictions or other reasonable bases for not doing so).

To the extent permitted by law, the Whistleblower Protection Officer may inform you and/or a person against whom allegations have been made, of the findings. CTA will document the findings in a report; however, any report will remain the property of CTA and will only be shared with you or any person against whom the allegations have been made if CTA deems it appropriate.

## 8. Protection of Whistleblowers

CTA is committed to ensuring that any person who makes a Protected Disclosure is treated fairly and does not suffer detriment, and that confidentiality is preserved in respect of all matters raised under this policy.

### 8.1 Protection from Legal Action

As an Eligible Whistleblower, you will not be subject to any civil, criminal, or administrative legal action (including disciplinary action) for making a Protected Disclosure under this policy or participating in any investigation into that disclosure.

Any information you provide will not be admissible in any criminal or civil proceedings against you other than for proceedings in respect of the falsity of the information.

### 8.2 Protection against Detrimental Conduct

CTA strictly prohibits all forms of 'Detrimental Conduct' against you if you have made a Protected Disclosure under this policy.

CTA also strictly prohibits all forms of Detrimental Conduct against any person who is involved in an investigation of a Protected Disclosure made under the policy in response to their involvement in that investigation.

CTA will take all reasonable steps to protect you from Detrimental Conduct and will take necessary action where such conduct is identified. If appropriate, CTA may allow you to perform your duties from another location or reassign you to another role (at the same level) or make other modifications to your workplace or your duties to protect you from the risk of detriment.

If you are subjected to Detrimental Conduct as a result of making a Protected Disclosure or participating in an investigation, you should inform a Whistleblower Protection Officer or Eligible Recipient in accordance with the reporting guidelines outlined above.

Under the Act, you may also seek remedies including compensation, civil penalties or reinstatement (if applicable) if you suffer loss, damage or injury because of Detrimental Conduct.





### 8.3 Protection of Confidentiality

All information received from you will be treated confidentially and sensitively.

You will not be required to provide your name when making a Protected Disclosure. To make a Protected Disclosure on an anonymous basis, it is recommended that you use a pseudonym and contact the Whistleblower Protection Officers in the manner outlined above.

If you make a Protected Disclosure on an anonymous basis, you will still qualify for the protections in this policy.

If you make a Protected Disclosure under this policy, your identity (or any information which would likely to identify you) will only be shared if:

- (a) you give your consent to share that information; or
- (b) the disclosure is allowed or required by law (for example, where the concern is raised with a lawyer for the purposes of obtaining legal advice); or
- (c) the concern is reported to ASIC, APRA, the Australian Taxation Office (ATO) or the Australian Federal Police (AFP) or other prescribed person or body.

Where it is reasonably necessary to disclose information for the effective investigation of the matter, and this is likely to lead to your identification, all reasonable steps will be taken to reduce the risk that you will be identified. For example, all personal information or reference to you witnessing an event will be redacted from any report, you will be referred to in a gender-neutral context, where possible you will be contacted to help identify certain aspects of your disclosure that could inadvertently identify you. Any Protected Disclosure under this policy will also be handled and investigated by qualified staff.

CTA will also take the following measures for protecting your identity:

- (d) all paper and electronic documents and other materials relating to disclosures will be stored securely;
- (e) access to all information relating to a disclosure will be limited to those directly involved in managing and investigating the Protected Disclosure;
- (f) only a restricted number of people who are directly involved in handling and investigating a Protected Disclosure will be made aware of your identity (subject to your consent) or information that is likely to lead to your identification;
- (g) communications and documents relating to the investigation of a Protected Disclosure will not be sent to an email address or to a printer that can be accessed by other staff; and
- (h) each person who is involved in handling and investigating a Protected Disclosure will be reminded about the confidentiality requirements, including that an unauthorised disclosure of your identity may be a criminal offence.

If you are concerned that your identity has been disclosed in relation to a Protected Disclosure, and without your consent, you should inform a Whistleblower Protection Officer or Eligible Recipient immediately.

## 9. Support Available

Any employee who makes a disclosure under this policy or is implicated as a result of a disclosure that is made may access CTA's Employee Assistance Program (EAP) which is a free and confidential counselling service, details listed below.





P: 1800 818 728

<https://www.accesseap.com.au/>

AccessEAP provides widespread coverage in Australia, New Zealand and Asia Pacific region.

CTA also allows immediate family members of employees to access the EAP service where needed. Immediate family members are defined as per the *Fair Work Act 2009* (Cth).

Where appropriate, CTA may also appoint an independent support person they deem appropriate to deal with any ongoing concerns you may have.

You may also access third party support providers such as Lifeline (13 11 14) and Beyond Blue (1300 22 4636) for support.

## 10. Other Matters

Any breach of this policy will be taken seriously and may result in disciplinary action, up to and including termination of employment.

In so far as this policy imposes any obligations on CTA, those obligations are not contractual and do not give rise to any contractual rights. To the extent that this policy describes benefits and entitlements for employees, they are discretionary in nature and are also not intended to be contractual. The terms and conditions of employment that are intended to be contractual are set out in an employee's written employment contract.

## 11. Relevant Policies

Employees are encouraged to read this policy in conjunction with other relevant CTA policies as referenced below

- (a) Code of Conduct
- (b) Anti-Bullying and Anti-Harassment Policy
- (c) Equal Employment Opportunity and Discrimination Policy
- (d) Grievance Handling Policy and Procedure
- (e) Discipline and Termination Policy

## 12. Controls

### 12.1 Owner and current status

Policy owner	Version	Approval date	Approved by	Date of next review	Document location
CEO	Version 1	July 2024	Kurt Lackovic	July 2027	Employment Hero – Policies and CTA Website



CEO	Version 2	June 2025	Kurt Lackovic	June 2028	Employment Hero – Policies and CTA Website
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