

Dated 30 September 2021

# **Whistleblower Protection Policy**

**Sgalio Energy Limited**  
**ARBN 152 971 821**  
**(Company)**

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## **Whistleblower Protection Policy**



This policy sets out the program to which the Company encourages whistleblower to report to any suspected misconduct without fear of reprisal, victimisation or detriment, which is an essential element in ensuring the highest level of integrity, fairness and ethical conduct within the organisation.

### **1. Objective**

The objective of this Policy is to:

- 1.1 encourage people to report to any suspected misconduct, such as the breaching of law, licence, code or regulation, conduct which is detriment to the public, fraud, bribery and corruption, false accounting, etc;
- 1.2 the procedure for reporting suspected misconduct;
- 1.3 sets out the protection whistleblowers will receives.

### **2. Scope**

- 2.1 This Policy applies to misconducts such as those listed in 1.1 of this Policy, but generally does not apply to personal work-related grievances;
- 2.2 Eligible whistleblower may include any existing or prior employees and officers of the Company, contractors, suppliers and associates, as well as their dependents, spouses and relatives;
- 2.3 For work-related grievance, employees are suggested to follow internal procedure and report relevant matter to their direct supervisor.

### **3. Mode of reporting and Recipients**

- 3.1 All suspected misconduct may be reported via email to [whistleblower@sagalio.com](mailto:whistleblower@sagalio.com);
- 3.2 A team lead by a director and the General Manager of the Company will be responsible for the handling and investigation of any reported incident;
- 3.3 Reports made be made anonymously to protect the identity of the whistleblower. However, whistleblower may note that reports made anonymously may be harder to

verify and investigate. The Company takes all suspected misconduct seriously, and is committed to ensure the protection and anonymity of any whistleblower.

#### **4. Investigation**

- 4.1 All reported incidents will be treated sensitively and seriously. The handling team will assess cases fairly and objectively, and will initiate investigation if considered to fall within the scope of this Policy;
- 4.2 Investigations will be conducted in a timely manner, and will be independent from any person to which the incident relates;
- 4.3 All employees, officers, contractors and suppliers are required to cooperate with any investigations;
- 4.4 Findings of investigations will be reported to the Board in a confidential manner, who will determine the appropriate actions concerning the incident;
- 4.5 All records of report and investigation will be kept confidential and may only be access by the Board or the team responsible for the investigation.

#### **5. Protection of Whistleblower**

The Company is committed to protecting the rights of whistleblowers.

- 5.1 The Company will ensure that the identity of whistleblowers remain anonymous and will only be disclosed under the whistleblower's consent, or is otherwise required by law or regulation, or to the Company's legal counsel for the purpose of obtaining legal advice;
- 5.2 The responsible team will handle investigations with care and take reasonable steps to avoid the disclosure of the whistleblower's identity during the investigation process;
- 5.3 Any detrimental conduct or threat of detrimental conduct towards whistleblowers or their relatives may result in severe consequences, including termination of employment or contracts, and may be reported to the relevant authorities;
- 5.4 Whistleblowers are also entitled to protection under law, even if the report is made in manners other than that described in this Policy. For further information regarding other rights available to whistleblowers, please refer to the following website:  
<https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/>.

#### **6. Access to this Policy**

- 6.1 This Policy can be found on the website of the Company. All existing staffs, employees and officers are made aware of the content of this Policy and will be notified of all subsequent changes and updates. All new members of the Company will also be given a copy of the most recent version of this Policy, and be explained of its content.

## **7. Note about this Policy**

- 7.1 This Policy is to be read in conjunction with the Company's Code of Conduct and the Anti-bribery and Anti-corruption Policy.
- 7.2 This Policy will be reviewed at least once every two-years. Any changes to this Policy will be approved by the Board and will be made available on the website of the Company.

**Approved by the Board on 30 September 2021**