
Whistleblowing Policy

Purpose

The purpose of this document is to set out the procedures to be followed, both by an employee and by the Company in relation to any protected disclosure under the Protected Disclosures Act 2000 (the Act).

The Act provides protection for employees who, in accordance with the Act, make disclosures of information about serious wrongdoing within an organisation. The Act is also known as the 'Whistleblowers Act'.

Scope

The following Policy applies to all companies in the Ports of Auckland Limited (POAL) group, and covers the procedures for dealing with reports made by POAL group staff or contractors of suspected or known serious wrongdoing within the POAL group.

Governing Legislation

This Policy relates to the following Legislation (click to see full text of the Act)

[Protected Disclosures Act 2000](#)

Interpretation

Serious wrongdoing includes:

- unlawful, corrupt or irregular use of funds or resources; or
- anything that poses a serious risk to public health, public safety or the environment; or
- anything that is illegal.

Whistleblowing Policy

If an employee or contractor becomes aware of any serious wrongdoing within the POAL group, the employee or contractor should report it. This can be done either directly to a POAL group employee or director or to the independent FairCall service. Both options give you protection under the Protected Disclosures Act.

Under the Act an employee who reports serious wrongdoing is protected if they:

- report information which they believe to be true; and
- disclose the information so that it can be investigated; and

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- want the disclosure to be protected.

The Act includes provisions protecting the confidentiality of your disclosure, and also protecting you from unjustified dismissal or other retaliatory action following a disclosure.

The Company will treat seriously and investigate any disclosure made under this policy. POAL will ensure the welfare of the person making a disclosure, including protecting that person's identity and ensuring that there is no retaliatory action against that person.

These protections are not available to any employee who makes an allegation they know to be false or otherwise acts in bad faith.

Responsibilities

How to report internally

If you feel comfortable doing so you can report the wrongdoing to:

- your immediate manager
- any member of the Executive team
- any member of the Governance team
- any member of the Audit Committee.

Contact details are included at the end of this Policy.

How to report externally and anonymously

If you feel unable to report the wrongdoing internally you can report it externally using the independent KPMG FairCall service using any one of the following methods:

- 1 Calling the toll free hotline service on 0800 100 526. You can do this anonymously. This line is monitored by trained and experienced KPMG professionals and is available on business days between 9am and 8pm. Outside of these hours you can leave a voice message and KPMG will return the call.
- 2 Emailing faircall@kpmg.com.au. KPMG will not provide POAL your email address, unless you allow them to.
- 3 Use the online reporting facility: <https://www.kpmgfaircall.kpmg.com.au/POA>. You can do this anonymously.
- 4 Mailing a report, or additional information, to a secure mailbox at:
The FairCall Manager
KPMG Forensic
PO Box H67
Australia Square
Sydney NSW 1213

You will need to note it relates to Ports of Auckland. You can do this anonymously.

Receiving a Protected Disclosure

If you receive a protected disclosure, your immediate responsibility is to ensure the welfare of the whistleblower and you must refrain from any activity that is, or could be perceived to be, victimisation or harassment of the person who makes the protected disclosure.

You must use all reasonable endeavours not to disclose information that might identify the person who made the protected disclosure, unless that person has consented in writing.

You must immediately report the disclosure to appropriate managers so that an investigation can be commenced. The Company Secretary or the Governance and Risk Manager must be notified. They will inform the Audit Committee as soon as practicable, and as a minimum at its next scheduled meeting.

You must advise the whistleblowing employee of the time frame for the investigation and of the outcome once the investigation is completed.

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