



Whistleblower Policy

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1 Introduction

1.1 Policy objective

U Ethical is committed to creating and maintaining a working environment that encourages openness, integrity and accountability. U Ethical recognises that any genuine commitment to detecting and preventing illegal conduct, misconduct or improper behaviour must include a mechanism where all employees and interested persons can report their concerns freely and without fear of reprisal or intimidation. This Whistleblower Policy enables this and encourages the reporting of such conduct.

U Ethical's values are:

- Authenticity: we do the right thing, not the easy thing
- Impact: we strive for better investments and a better world
- Progress: we are open-minded, innovative and future focused.

U Ethical's Whistleblower Policy (this policy) supports U Ethical's values by providing a framework to:

- Encourage the reporting of improper behaviour within U Ethical;
- Ensure that employees are aware that there are mechanisms in place for the reporting and investigation of improper behaviour;
- Ensure individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be supported and protected, including their anonymity;
- Ensure disclosures are managed appropriately in a timely manner;
- Provide transparency around U Ethical's process for receiving, handling and investigating disclosures;
- Help deter wrongdoing;
- Ensure U Ethical continues to conduct its activities with the highest standards of ethical and fair business conduct;
- Comply with the relevant regulations;
- Preserve U Ethical's reputation; and
- Ensure U Ethical remains true to its values.

This policy should be read in conjunction with U Ethical's values and Code of Ethics and Conduct. It forms part of the Risk Management Framework and Compliance Framework, being one of the key mechanisms in U Ethical's risk management toolkit for identifying wrongdoing.

1.2 Scope and application

The scope of this policy covers U Ethical, UCA Cash Management Fund Limited and UCA Growth Fund Limited.

This policy applies to all current and former:

- directors, team members, contractors and consultants of U Ethical and its related bodies corporate; and
- a relative, spouse or dependant of any of the above mentioned individual.

1.3 Abbreviations and definitions

AFP	Australian Federal Police
ASIC	Australian Securities Investments Commission
APP	Application
APRA	Australian Prudential Regulation Authority
ARCC	Audit, Risk and Compliance Committee
Body Corporate	Such as an external auditor; custodian; or outsourced provider of U Ethical
CEO	Chief Executive Officer
Corporations Act	Corporations Act 2001
EAP	Employee assistance program

1.4 Governance and oversight

1.4.1 Audit, Risk and Compliance Committee

As the board's delegated body for oversight of U Ethical's risk and compliance management, the ARCC exercises oversight over the whistleblower arrangements described in this policy through:

- Ensuring there is a whistleblower policy which will meet legal obligations and the policy objective;
- monitoring the effectiveness of the whistleblower policy; and
- receiving updates on any whistleblower reports.

1.4.2 Leadership team

The Leadership team (including CEO) establish, implement and maintain the whistleblower arrangement described in this policy.

This includes ensuring the nomination of suitable Whistleblower Protection Officer(s), the appointment of an external service provider and provision of support services to whistleblower(s) where appropriate.

1.4.3 Director - Risk and Compliance

The Director - Risk and Compliance supports the Leadership Team in implementing whistleblower arrangements under this policy, which includes providing updates to the Leadership team as necessary, notifying the Chair of the ARCC at the time of an event, and reporting quarterly to the ARCC.

The ARCC report will include:

- the effectiveness of this policy, processes and procedures;
- U Ethical's compliance with regulatory obligations on whistleblower arrangements;
- U Ethical's compliance with this policy, processes and procedures; and
- where appropriate, provide a report summarising whistleblower disclosures and reports, to the extent where the information contained in a disclosure or report does not lead to the identity of the whistleblower.

2 Who is an eligible whistleblower?

Eligible whistleblowers are individuals who can make a report and disclosure that qualifies for protection under the Corporations Act.

At U Ethical, an Eligible Whistleblower includes:

- (a) an officer of U Ethical (current or former);
- (b) a team member of U Ethical (current or former team member who are/were permanent employees, managers, part-time, interns, secondees, fixed term or temporary employees);
- (c) an individual who supplies goods or services to U Ethical (current or former, whether paid or unpaid e.g. contractors, business partners, consultants);
- (d) an employee of a person who supplies services or goods to U Ethical (whether paid or unpaid);
- (e) an individual who is an associate (as defined under the Corporations Act) of U Ethical;
- (f) a relative of an individual referred to in any of the paragraphs (a) to (e);
- (g) a dependent or spouse of an individual referred to in any of the paragraphs of (a) to (e).

An Eligible Whistleblower can choose to remain anonymous while making a disclosure or over the course of investigation and after the investigation is finalised. An Eligible Whistleblower can also refuse to answer questions that they feel could reveal their identity any time, including during follow-up conversations. Please refer to section 4.3 for further information.

3 Who is an eligible recipient?

A report made by an eligible whistleblower to an **eligible recipient**, can qualify for protection under the Corporations Act.

At U Ethical, an eligible recipient includes:

- Stopline - U Ethical's external whistleblower service provider;
- Any member of the leadership team;
- Any director of U Ethical;
- U Ethical's external auditor (including a member of the audit team conducting the audit);
- U Ethical's internal WPO; or
- U Ethical's external WPO.

Eligible whistleblowers are encouraged to make disclosures to Stopline in the first instance.

3.1 Stopline

U Ethical has engaged an external service provider, Stopline, to handle whistleblower disclosures. Stopline provides a confidential and independent service to parties involved. If the discloser wishes to remain anonymous with Stopline their request will be adhered to.

Stopline's disclosure channels below are available 24 hours a day, 365 days per year.

Telephone	1300 30 45 50
Email	makeareport@stopline.com.au
Online (website)	http://www.stopline.com.au
FAQs	https://uethical.stoplinereport.com/faq/
APP	Stopline365
Post	U Ethical c/- Stopline P.O. Box 403 Diamond Creek Vic 3089

3.2 Whistleblower Protection Officers (WPO)

In the first instance Stopline will investigate the allegations, and based on initial information, will identify the category of concern to which the disclosure relates. Stopline will subsequently establish the various steps to be taken to address the discloser's concerns. If required, Stopline will contact only one of the below WPO's. If the first WPO is not available or the allegation relates to them, then the second WPO will be contacted etc. The main point of contact is the Director Risk and Compliance.

Point of contact	Whistleblower Protection Officer (WPO)
1 st	Director – Risk and Compliance
2 nd	Director – Finance
3 rd	Director – People and Culture, Mission Resourcing Unit

Refer to section 5.1 for information on the process to make a report under this policy.

3.3 External recipients

A whistleblower can also receive protection under the Corporations Act if they make a report or disclosure regarding a discloseable matter to:

- (a) the external auditor of U Ethical and its related bodies corporate, including a member of the audit team conducting the audit;
- (b) an external legal practitioner, for the purposes of obtaining legal advice or legal representation in relation to the whistleblower protection (even if the report or disclosure may not relate to a discloseable matter);

- (c) any Commonwealth regulator, such as ASIC or APRA. To report and disclose about a reportable matter to ASIC, refer to [ASIC Information Sheet 239 How ASIC handles whistleblower reports](#);
- (d) journalists or members of parliament under the circumstances described in section 3.4 below.

3.4 Public Interest Disclosures and Emergency Disclosures

3.4.1 Considerations before making a public interest disclosure or emergency disclosure

Where a public interest disclosure or emergency disclosure regarding a matter related to U Ethical is being considered, the whistleblower is strongly encouraged to seek independent legal advice to ensure the whistleblower understands the criteria for making a public interest or emergency disclosure that qualifies for protection under the Corporations Act.

3.4.2 Public interest disclosures

A "public interest disclosure" means the disclosure of information to a journalist or a parliamentarian where:

- (a) at least 90 days have passed since the whistleblower made the disclosure to ASIC, APRA or another Commonwealth regulator;
- (b) the whistleblower does not have reasonable grounds to believe that action is being taken regarding their whistleblower report;
- (c) the whistleblower has reasonable grounds to believe that making further disclosure of the information is in the public interest; and
- (d) the whistleblower has written to the regulator where they had previously made a report, that:
 - i. includes sufficient information to identify the previous disclosure; and
 - ii. states that the whistleblower intends to make a public interest disclosure.

3.4.3 Emergency disclosures

An "emergency disclosure" is the disclosure of information to a journalist or parliamentarian where:

- (a) the whistleblower has previously made a disclosure of the information to ASIC, APRA or another prescribed Commonwealth regulator;
- (b) the whistleblower has 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;
- (c) before making the emergency disclosure, the discloser has given written notice to the body under paragraph (a) that:
 - i. includes sufficient information to identify the previous disclosure; and
 - ii. states that the whistleblower intends to make a public interest disclosure.

4 What matters are discloseable?

4.1 Types of matters covered by this policy

U Ethical recognises that a broad range of matters may be reported and disclosed.

For the purposes of this policy, a whistleblower can report and disclose matters involving information that they believe has reasonable grounds to suspect or infer improper or reportable conduct in relation to U Ethical and its related bodies corporate.

A whistleblower's belief need not be correct (i.e. it might be discovered subsequently that they were in fact wrong) however, they must show that they held a reasonable suspicion in the circumstances at the time of making the disclosure.

While it is not possible to provide a definitive list, the following matters can be reported / disclosed and qualified for protection (i.e. **Discloseable matters**) if a person believes there are reasonable grounds to suspect:

- (a) misconduct or improper state of affairs (including tax affairs) or circumstances by or related to U Ethical and its related bodies corporate;
- (b) misconduct by an officer or employee of U Ethical or its related bodies corporate;
- (c) conduct that breaches laws or instruments made under the law, relevant to U Ethical's operations (including Corporations Act and ASIC Act);
- (d) conduct that constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for 12 months or more;
- (e) illegal conduct such as theft, dealing in or use of illicit substances, violence or threatened violence, or criminal damage against property;
- (f) fraud, money laundering or misappropriation of funds;
- (g) corrupt conduct including offering or accepting a bribe;
- (h) financial irregularities;
- (i) intentional or negligent disregard for legislative or regulatory requirements;
- (j) unethical behaviour and practices;
- (k) conduct that causes harm;
- (l) conduct that is prohibited by any standards or codes of conduct to which U Ethical subscribes;
- (m) conduct that represents a significant risk to public safety or the stability of, or confidence in, the financial system (even if it does not involve a breach of a particular law);
- (n) conduct that engages in or threatens to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made or is planning to make a disclosure; and

4.2 Types of matters not covered by this policy

4.2.1 Solely personal work-related grievance matters

Whistleblower reports or disclosures relating **solely** to "personal work-related grievances", and that do not relate to detriment or threat of detriment to the whistleblower, do not qualify for protection under the Corporations Act.

"Personal work-related grievance" means:

- (a) the information concerns a grievance about any matter in relation to the whistleblower's employment, or former employment, having (or tending to have) implications for the whistleblower personally; and
- (b) the information does not:
 - i. have significant implications for U Ethical; or
 - ii. relate to any conduct, or alleged conduct, about a disclosable matter (refer to sections 3.1 and 3.2 for definition).

Grievances that may be personal work-related grievances include:

- (a) an interpersonal conflict between the discloser and another team member;
- (b) decisions that do not involve a breach of workplace laws:
 - i. about the engagement, transfer or promotion of the whistleblower;
 - ii. about the terms and conditions of employment or engagement of the whistleblower; or
 - iii. to suspend or terminate the engagement of the whistleblower, or otherwise to discipline the whistleblower.

An individual may raise matters **solely** relating to "personal work-related grievances" and any other types of issues or concerns not covered by this policy with:

- their immediate manager;
- the relevant leadership team member; or
- the Synod Ministries and Operations' people and culture team.

Team members can contact the Fair Work Ombudsman for queries or concerns regarding workplace laws or access our EAP provider "Caraniche" on 1800 099 444 for confidential professional counselling support.

4.2.2 Whistleblower matters involving personal work-related grievances

A whistleblower report is protected under the Corporations Act if it includes **both**:

- (a) a discloseable matter(s); and
- (b) personal work-related grievance.

The following are examples, which are not exhaustive:

- (a) a personal work-related grievance which includes information about misconduct, or information about misconduct includes or is accompanied by a personal work-related grievance (mixed report);
- (b) U Ethical has breached employment or other laws punishable by imprisonment for 12 months or more;
- (c) U Ethical has engaged in conduct that represents a danger to the public;
- (d) the discloseable matter relates to information suggesting misconduct beyond the whistleblower's personal circumstances;
- (e) the whistleblower suffers from or is threatened with detriment for making a disclosure;
- (f) the whistleblower seeks legal advice or legal representation about the operation of whistleblower protections under the Corporations Act when it does not involve a work-related grievance

5 How to make a protected disclosure

5.1 Considerations before making a disclosure

A whistleblower who is a team member is encouraged, but not required, to use all immediate management reporting lines to resolve the issue before making a whistleblower report and disclosure.

If a whistleblower believes that their immediate manager and/or the CEO or any of the leadership team is involved in improper conduct, or they have any concerns regarding the way their report will be handled, the whistleblower should go directly to Stopline (refer 1.9 above).

5.2 False reporting

However, if a whistleblower has made a deliberately false report, then that conduct itself should be considered a serious matter and could result in the person concerned being subject to disciplinary action.

6 What protections are available to a whistleblower?

6.1 Protection from detrimental acts or omission

Any person who makes a whistleblower report or disclosure will not be personally disadvantaged or subject to detrimental acts or omission for having made the report or disclosure.

There will not be any threats or acts of:

- if the whistleblower is an employee,
 - dismissal;
 - alteration of the whistleblower's position or duties to their disadvantage;
 - discrimination (either direct or indirect) between an employee and other employees of the same employer;
 - current or future bias or disadvantage;
 - injury to the whistleblower in their employment;
- any form of harassment or intimidation (including bullying);

- harm or injury to a whistleblower, including psychological harm;
- damage to a whistleblower's property;
- damage to a whistleblower's reputation;
- damage to a whistleblower's business or financial position; or
- any other damage to the whistleblower.

Both civil and criminal penalties apply for breaches of whistleblower protections.

6.1.1 Reporting detrimental threats, acts or omission

U Ethical treats any detrimental threat, act or omission against a whistleblower as serious misconduct. It will result in disciplinary action.

If a whistleblower believes that a detrimental act or omission is occurring, or been threatened, the whistleblower can report it to Stopleveline or the ARCC.

Where it is evident that the whistleblower has acted on reasonable grounds, a WPO, who is not involved in their specific investigation, will be designated to oversee and ensure that the whistleblower is not subject to any detrimental act or omission, and to provide additional support to the whistleblower where necessary.

Disclosure can be made if whistleblowers have some information leading to a reasonable suspicion, but not all the details. In situations where a whistleblower discloses reasonable suspicion of misconduct and the suspicions are later determined to be unfounded, the whistleblower must not be subject to any detrimental act(s) or omission(s).

6.2 Confidentiality

6.2.1 Anonymity

Whistleblowers will be given the option to remain anonymous. Should a whistleblower wish to remain anonymous, it is important that they ensure that at the time of making a disclosure, they provide enough information to facilitate a thorough investigation into the matter(s) being raised or, if via Stopleveline, an anonymous mechanism for ongoing communication will be offered.

6.2.2 Identity protection

Maintaining confidentiality is crucial to the whistleblowing process to ensure that the whistleblower is not subject to detrimental actions, reprisals, disciplinary action or victimisation. U Ethical has a legal obligation to protect the confidentiality of the whistleblower's identity.

All whistleblower reports and disclosures will be treated with the strictest confidence and all reasonable steps will be taken to protect the identity of the whistleblower, where the whistleblower had reasonable grounds to suspect that misconduct or an improper state of affairs exists.

Stopleveline and U Ethical's the nominated WPO must maintain confidentiality such that the identity of the whistleblower or any information that is likely to lead to the identification of the whistleblower is protected.

It is illegal for any person to identify a whistleblower, or disclose information that is likely to lead to the identification of a whistleblower, outside of the exceptions under paragraph 6.2.3.

6.2.3 Circumstances where confidentiality may not be maintained

The exception to the confidentiality requirement is if the identity of the whistleblower and/or the whistleblower report is provided to:

- (a) ASIC, APRA or a member of the AFP; or
- (b) to a legal practitioner (for the purposes of obtaining legal advice or legal representation about the whistleblower provisions in the Corporations Act); or
- (c) with the consent of the whistleblower.

The regulators and AFP can disclose the identity of the whistleblower, or information that is likely to lead to the identification of the whistleblower, to a Commonwealth, state or territory authority to help the authority in the performance of its functions or duties.

However, information about a whistleblower report can be disclosed without the consent of the whistleblower if:

- (a) the information does not include the whistleblower's identity; and
- (b) it is reasonably necessary for investigating the issues raised in the disclosure and "all reasonable steps" have been taken to reduce the risk that the whistleblower will be identified; and
- (c) U Ethical has taken all reasonable steps to reduce the risk that the whistleblower will be identified from the information.

6.3 Compensation and other remedies

Under the Corporations Act, a whistleblower can seek compensation and other remedies through the courts if:

- (a) they suffer loss, damage or injury because of a whistleblower report or disclosure; **and**
- (b) U Ethical failed to prevent a person from causing the detriment.

Whistleblowers considering seeking compensation and/or remedies are strongly encouraged to seek independent legal advice.

6.4 Civil, criminal and administrative liability protection

Under the Corporations Act, a whistleblower is protected from any of the following in relation to the whistleblower report and disclosure regarding a matter covered under this policy:

- (a) civil liability (e.g. any legal action against the whistleblower for breach of an employment contract, duty of confidentiality or another contractual obligation);
- (b) criminal liability (e.g. attempted prosecution of the whistleblower for unlawfully releasing information, or other use of the report and disclosure against the discloser in a prosecution, other than for making a false report or disclosure); or
- (c) administrative liability (e.g. disciplinary action for making the disclosure).

The whistleblower is entitled to protection from detrimental acts and/or omission for making a report under this policy. However, if the report or disclosure reveals that the whistleblower has engaged in any misconduct, the whistleblower is not protected from any civil, criminal or administrative action arising from that misconduct. However, an admission may be a mitigating factor.

7 Handling and investigating disclosures

7.1 Investigation process

U Ethical has engaged an external whistleblower provider, Stopleveline, to handle and investigate whistleblower disclosures that are covered by this policy.

Stopleveline will ensure that investigations are thorough, objective, fair and independent, while preserving the confidentiality of the investigation.

What happens when a report or disclosure is received by Stopleveline?

Receive	All reports/disclosures are received by independent, experienced staff via phone, email, website, videoconference, app or post.
Establish	Where the report/disclosure method allows, a rapport will be established with the discloser to explain the process, determine their wishes regarding confidentiality, answer questions, and provide a caller code for future contact.

Classify	Based on initial information the category of concern to which the disclosure relates (e.g. dishonesty, improper behaviour, unsafe practices or security breach) will be identified.
Elicit	Details will be obtained regarding the issue, including available evidence, people involved, location, magnitude and impact.
Record	All information will be entered in a secure database in such a way that reports can be generated in a confidential manner if required.
Advise	Initial information and advice will be promptly provided to the WPO.
Report	A written report outlining all available details, and opinion on the caller's motivation and the likely veracity of the disclosure will be provided to U Ethical's WPO.
Investigation	Where a report is not vexatious or frivolous, the WPO will authorise an external or internal independent investigation to substantiate or refute the allegation.
Feed-back	Where possible, appropriate feedback to the discloser as to the steps taken, and the outcome, will be provided.

7.2 Post-investigation considerations

7.2.1 Review of investigation conclusion

Where the whistleblower is dissatisfied with the outcome of the investigation, the whistleblower may notify U Ethical through Stopline or the WPO.

However, U Ethical is not obliged to reopen an investigation, and it can conclude that:

- the investigation was conducted properly;
- new information is not available; or
- new information will not alter the findings of the investigation.

A whistleblower can pursue an alternative protected whistleblowing process under section 6.

7.2.2 Process where the investigation is reopened

The WPO must notify the ARCC if a review of the outcome is sought by the whistleblower. The ARCC must consider any issues raised by the whistleblower and determine whether the investigation is to be reopened.

Where the investigation is reopened, the ARCC will request the external service provider nominate a different team member to investigate. The nominated Stopline team member is to review the outcome of the initial investigation and must adhere to the same procedure for investigation to determine whether:

- the initial investigation was conducted properly and in accordance with procedures; and
- any new information is either available and whether it would change the findings of the investigation.

Reports and outcomes of the review must be provided to the ARCC for approval.

Where possible, Stopline will provide appropriate feedback to the discloser as to the steps taken, and the outcome.

7.3 Fair treatment of individuals mentioned in a report or disclosure

If a whistleblower report or disclosure mentions a particular U Ethical team member or director, and a formal investigation commences the WPO, in consultation with Stoptline, will:

- (a) manage the investigation confidentially, in line with this policy;
- (b) assess each report and determine whether a particular individual is subject to a formal investigation;
- (c) ensure that sufficient evidence is obtained to substantiate or refute the matters reported;
- (d) advise the particular individual who is the subject of a report or disclosure about:
 - i. the subject matter of the disclosure as and when required by the principles of natural justice, procedural fairness, and taking into account potential destruction of evidence and
 - ii. any actions to be taken, including any referrals to ASIC, APRA or the AFP; and
- (e) provide a summary report of the outcome/s of the formal investigation to the ARCC, excluding the identity of the discloser..

7.4 Limitations to investigations

Where an investigation relates to an anonymous whistleblower report or disclosure, Stoptline may not be able to undertake the appropriate investigation if they are unable to contact the whistleblower.

8 Roles and responsibilities under this policy

8.1 Stoptline

Stoptline has been engaged by U Ethical to be the main point of contact for any disclosures, to assess disclosures and to forward their initial assessment to the WPO for further investigation where necessary.

8.2 WPO

The WPO is accountable to the ARCC and will have direct access to key U Ethical Team members to ensure effective protection of the whistleblower, and is also responsible for safeguarding the interests of the whistleblower and determining whether the whistleblower has or is likely to be subject to detrimental act(s) or omission(s).

If the WPO identifies any actual, apparent or potential conflicts of interest at any time, they must inform Stoptline as soon as reasonably practicable for a replacement internal WPO to be nominated.

While maintaining confidentiality and where it does not lead to the identification of a whistleblower, the WPO must provide quarterly updates to the ARCC with the following information:

- (a) subject matter of each whistleblower report;
- (b) status of each report;
- (c) for each report, the type of individual who made the disclosure (e.g. employee or supplier) and their status (e.g. whether they are still employed or contracted by the entity);
- (d) the action taken for each disclosure;
- (e) how each disclosure was finalised;
- (f) the timeframe for finalising each disclosure;
- (g) the outcome of each disclosure; and
- (h) any recommendations to prevent future recurrence.

8.3 Management, leadership team and directors

If management, leadership team or directors receive whistleblower reports, they are responsible for:

- (a) maintaining confidentiality of any whistleblower report received;
- (b) safeguarding the identity of whistleblower; and
- (c) obtaining consent from the whistleblower to notify Stoptline.

9 Training

All team member are to be provided with training and education regarding this policy, processes and procedures. The training measures will be scaled to the roles and responsibilities of each team member under this policy. The table below shows the different types of training provided by the Risk and Compliance.

	New	Existing
All team members	<ul style="list-style-type: none"> - Induction training within 6 weeks of commencement - Overview and discussion of this policy, processes and procedures, including any external whistleblower service used by U Ethical, is provided at induction - A copy of this policy and procedure is provided 	<ul style="list-style-type: none"> - Annual refresher training - Protections available under this policy - How to make a whistleblower report - Channels available to employees - A copy of this policy and procedure is provided
Management and leadership	<ul style="list-style-type: none"> - Induction training within 6 weeks of commencement - Overview of their role, responsibilities and obligations under this policy - How whistleblower reports may be identified, received and escalated - Methods to maintain confidentiality and preserve anonymity - A copy of this policy and procedure is provided 	<ul style="list-style-type: none"> - Annual refresher - Overview of their role, responsibilities and obligations under this policy - How whistleblower reports may be identified, received and escalated - Methods to maintain confidentiality and preserve anonymity - A copy of this policy and procedure is provided
Directors	<ul style="list-style-type: none"> - New director training program - Governance and oversight of this policy - An overview of their role, responsibilities and obligations under this policy - How whistleblower reports may be identified, received and escalated - Methods to maintain confidentiality and preserve anonymity - A copy of this policy and procedure is provided 	<ul style="list-style-type: none"> - Annual director training program - Governance and oversight of this policy - An overview of their role, responsibilities and obligations under this policy - How whistleblower reports may be identified, received and escalated - Methods to maintain confidentiality and preserve anonymity - A copy of this policy and procedure is provided

10 Monitoring and reporting

Any non-compliance with this Policy is taken seriously and all potential breaches will be investigated. Depending on the extent, nature and impact of non-compliance with this Policy, breaches may result in disciplinary action or other legal consequences for the individuals concerned.

Where non-compliance is identified, it must be reported to the Director - Risk and Compliance, for escalation to the ARCC.

The Director - Risk and Compliance will obtain reports and statistics, with no identifiable information, and assess the effectiveness of the whistleblowing policy and providers process. These assessments will be reported to the ARCC at least annually.