



POLICY NAME	DSE TRANSPORT WHISTLEBLOWING POLICY
EFFECTIVE DATE	1 DECEMBER 2023
POLICY OWNER	MANAGING DIRECTOR

1. Purpose of the policy

DSE Transport and its subsidiaries (collectively referred to as **DSE**) are committed to maintaining a work environment which is fair, productive, efficient, supportive, respectful, harmonious, healthy and safe. This policy is designed to encourage those who are aware of a wrongdoing to speak up safely.

1.1 Note from the Managing Director

I am proud of DSE's commitment to the highest standards of conduct and to promoting and supporting a culture of honest and ethical behaviour. At DSE, we actively encourage the reporting of any instances of suspected unethical, illegal, fraudulent or undesirable conduct, and we have a number of confidential and secure means of safely doing so. For current team members (office staff, drivers or subcontractors) we

strongly recommend that you **use Ryan Direct** via the Elker Speak Up platform to raise a concern. You can access Ryan Direct and the Elker platform via this link: <https://dse.elker.com/report> The Elker platform is operated by an independent third-party provider. The link is available 24/7 every day and allows you to disclose a matter via an encrypted platform for secure, anonymous reporting.

Alternatively, this policy explains DSE's whistleblowing framework so that if you are blowing a whistle, you know what process to follow and what protections are available to you.

— Ryan Howison, Owner and Managing Director

2. Who does this policy apply to?

Whistleblowers are individuals who sound the alert on danger, malpractice, bribery, corruption, or other illegal or systemically poor conduct.

This policy applies to current or former officers, staff, volunteers, contractors or suppliers, plus their associates and their family members, and provides the basis for reporting and protection provided to the whistleblower for making a disclosure about corporate, financial or taxation misconduct.

3. What matters can be disclosed?

A discloser must have reasonable grounds to disclose information that they believe reveals:

- Illegal conduct, such as theft or violence
- Fraud or misappropriation of funds
- Financial irregularities
- Risk to public safety
- Instability of the company's financial system
- Acts that impact the core of the company's culture, for example, bullying or harassment that is systemic in nature.

Matters that are work-related grievances and not covered by this policy include:

- Interpersonal conflict between employees
- Transfers or promotions
- Terms and conditions of engagement
- Decisions relating to the termination or engagement of employment
- Performance issues

Please refer to DSE's Problem Solving Policy and Procedure document for further information and guidance if you need to report a work-related grievance.

4. Who can receive a disclosure?

DSE's Owner and Managing Director, Ryan Howison, will be the primary recipient of any disclosures. The Head of People & Culture will act as a secondary recipient as required.

4.1 Eligible recipients

The Act provides the right to report to eligible recipients (Managing Director and nominated whistleblower contacts), legal practitioners and other external advisers' Regulatory bodies followed by parliamentarians and the press (see public interest and emergency disclosures below).

We suggest you make the report internally via the Elker Speak Up platform before using Regulatory bodies (ASIC, APRA and the ATO). This is to allow DSE to identify and address any wrongdoing as early as possible and build trust and confidence in our own processes.

In addition, DSE has engaged Elker to act as an independent third-party whistleblowing service. Elker has configured a platform that allows you to securely report with or without a name. The link is available 24/7 every day through the Elker web portal: <https://dse.elker.com/select-flow/xDRS0y>

To qualify for protection, the disclosure needs to be made to an 'eligible recipient'. You can contact DSE's nominated whistleblowing contact (NWC) using the details below. The NWC is available to receive reports and assist with enquiries on how to access support and how to make a report:

Ryan Howison – Owner and Managing Director, DSE Ph: 0408 999 681
Email: ryanh@dsetrucks.com.au

There is also an ability to make public interest and emergency disclosures first to ASIC and APRA and then to parliamentarians or a journalist. Independent legal advice is recommended before doing so.

4.2 People who can receive a disclosure that qualifies protection include:

- 'Eligible recipients' (NWC)
- Legal practitioners
- Regulatory bodies
- Journalists and members of the Commonwealth state or territory parliaments under certain circumstances see s 1317AAD

A public disclosure is the disclosure of information to a journalist or parliamentarian where:

- 1) At least 90 days has passed since the discloser made the disclosure to ASIC, APRA or another Commonwealth body prescribed by the regulations

- 2) The discloser does not have reasonable grounds to believe that action is being, or has been taken in relation to their disclosure. The discloser has reasonable grounds to believe that making a further disclosure of the information is in the public interest; and
- 3) Before making the public interest disclosure the discloser has given notice to the body to which the previous disclosure was made that includes:
 - a. sufficient information to identify the previous disclosure; and
 - b. states that the discloser intends to make a public interest disclosure

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

- 1) the discloser has previously made a disclosure of information to ASIC, APRA or another commonwealth body prescribed by regulation.
- 2) The discloser has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons in the natural environment.
- 3) Before making the emergency disclosure the discloser has given written notice to the body to which the previous disclosure was made that includes:
 - a. enough information to identify the previous disclosure.
 - b. the discloser intends to make a public interest disclosure and the extent of information disclosed in the emergency disclosure is no greater than is necessary to inform the journalist or parliamentarian of the substantial and imminent danger.

5. Status of Legal Advice and Whistleblowing

It is useful for you to note that if you approach a legal practitioner for the purpose of legal advice or representation on the whistleblowing provisions, then these **conversations and the advice are protected even where the legal practitioner concludes that the disclosure doesn't relate to a disclosable matter.**

6. How to make a disclosure using the external platform - Elker

The Elker platform guides disclosers through the process of logging a matter. It will provide a secure number for you to track the journey of your report. It allows for full anonymity and has the capability for anonymous two-way communication if it is required to get more information to progress the issue.

We encourage our employees to use this method of lodgement for any disclosures to ensure the accurate capture of the matter and to protect those who choose to remain anonymous. You will be provided with a unique number that will allow you to follow the progress of your claim and provide more information.

You can access the dedicated Elker portal at: <https://dse.elker.com/select-flow/xDRS0y>

You can read more about Elker at: <https://elker.com>