

# WHISTLEBLOWER PROTECTION POLICY

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## Introduction

Pro Medicus (PME) is committed to maintaining its vision to be the leading provider of best-in-class enterprise medical imaging software.

Our Whistleblower Protection Policy (Policy) forms part of PME's risk management framework along with other associated risk and compliance policies.

The Policy is also underpinned by PME's mission to provide the best value enterprise Healthcare Imaging software solutions, "moving the needle" on clinical outcomes and Return on Investment (ROI).

## What does this Policy do?

You may have concerns about conduct within PME which appears to you to be illegal, unethical or otherwise improper, but you may feel apprehensive about raising your concerns because of the fear of possible adverse repercussions to you. This might be the case, for example, if your concerns relate to conduct of your immediate manager.

The aim of this policy is to make you feel confident about raising concerns internally, by offering a reporting and investigative mechanism that is objective, confidential, independent and protects you from reprisal or disadvantage.

Under this Policy:

- you are encouraged to report your concerns, whether openly or, if preferred, anonymously
- if you report your concerns, you will be afforded confidentiality unless you indicate (or the law requires) otherwise
- concerns reported by you will be properly investigated with a view to establishing the truth and correcting any wrongdoing where possible
- you will be advised of the outcome of the investigation and any action taken as much as practicable
- you will not be victimised or adversely affected because of your action in reporting your concerns provided of course, that there is a basis for your concerns, and that you have acted in good faith and without malicious intent

## Who does this Policy apply to?

This Policy applies to anyone who is employed by or works at PME, including employees (whether permanent, part time, fixed-term or temporary), contractors, consultants, secondees and directors.

## Policy on Whistleblowing

All PME employees have a responsibility to help detect, prevent and report instances of suspicious activity or wrong doing, referred to as a *Reportable Matter*. You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage with your immediate manager, and serious matters will then be escalated through to senior management.

PME is committed to ensuring that all employees have a safe, reliable and confidential way of reporting any Reportable Matters. You should report a Reportable Matter under this Policy if you:

- have previously reported a Reportable Matter and you are not satisfied with the response to your report; or
- feel unable to raise the Reportable Matter with your manager, either because your manager is the subject of your report or because you have another reason to believe that your manager is unlikely to deal with the report properly.

## What is a “Reportable Matter”?

A Reportable Matter is any concern (actual or suspected) about the following conduct, or the deliberate concealment of such conduct:

- financial irregularity (including a fraud against PME or a customer or supplier)
- corrupt conduct
- criminal conduct
- failure to comply with any legal or regulatory obligation
- unfair or unethical dealing with a customer
- Other serious improper conduct, including breaches of PME policies
- danger to the public or the financial system
- offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more

## How to Report

Any report under this Policy can be made via any of the following, noting it may depend on the matter and the person who is the subject of the matter:

- to the relevant line Manager (if not your immediate manager)
- to the General Manager
- to the Chair of the Audit Committee

You may at any stage skip a person in the chain outlined above if that person is the subject of the report or if you have another reason to believe that the person is not likely to deal with the report properly.

While reports can be made anonymously if preferred, this may affect the ability to investigate the matter properly and to communicate with you about your report.

Nothing in this Policy should be taken as restricting you from reporting any matter or providing any information to a regulator (such as ASIC), PME’s auditor or a member of the audit team or any other person in accordance with any relevant law, regulation or other requirement.

## Action required when your Report is made

The person who you make a report to under this Policy must do the following:

- ensure that the matter is properly investigated by the person nominated for the purposes of this Policy as the Whistleblowing Investigations Officer, the General Manager or some other independent and suitably qualified person nominated by the Chief Executive Officer or the Chair of the Audit Committee
- give the General Manager particulars of the report that has been made

## Investigation Process

Investigation processes will vary depending on the precise nature of the conduct being investigated. The purpose of the investigation is to determine whether or not your concerns are substantiated, with a view to PME then rectifying any wrongdoing uncovered to the extent that this is practicable in all the circumstances.

The investigation will be thorough, objective, fair and independent of you, anyone who is the subject of the Reportable Matter, and any business unit concerned. The investigation will also have proper regard to the principles set out in the Australian Standard on Whistleblower Protection Programs.

## Communicating with you about your Report

The Whistleblower Investigations Officer will keep you informed of the outcome of the investigation arising from your report, subject to considerations of the privacy of anyone who is the subject of the Reportable Matter and normal confidentiality requirements.

Where practicable, you will be provided with initial feedback within a week of making your report, and any further feedback on a fortnightly basis as the matter progresses.

## Your Protection

The person who you make a report to under this Policy may, if you agree, disclose your identity to the Whistleblower Protection Officer, but will otherwise keep your identity confidential. They will ensure that all files relating to your report are kept secure, and that information received from you is held in confidence and is only disclosed to a person not connected with the investigation if:

- you have been consulted and have consented to the disclosure, or
- it is required or permissible by law

It is possible that someone might deduce your identity without there having been a breach of confidentiality, if the nature of your report points to one particular individual having made it, or otherwise as a consequence of the nature of the investigatory process.

PME recognises that “whistleblowing” can be a very stressful and difficult thing to do. Provided that you are acting in good faith and that you have not yourself engaged in serious misconduct or illegal conduct, to the maximum extent possible you will not be subject to disciplinary sanctions by PME in relation to any matters that you report.

PME will safeguard your interests, having regard to this Policy, the Australian Standard on Whistleblower Protection Programs, and any other applicable policies and laws.

In particular, PME will take whatever action is possible consistently with this Policy to make sure that you are not personally disadvantaged for making your report, whether by dismissal, demotion, any form of harassment, discrimination or any form of current or future bias.

If you claim to have been the subject of any such action as a consequence of making your report, and the matter cannot be resolved with you by management, the matter will be referred to the Chair of the Audit Committee.

Any person found in breach of the provisions in this Policy will be subject to disciplinary procedures, up to and including the termination of your employment or engagement with PME.

## Whistleblower Protection Officer

The Chief Financial Officer is appointed as a Whistleblower Protection Officer with powers and duties consistent with the Australian Standard on Whistleblower Protection Programs.

## False Reporting

A false report of a Reportable Matter could have significant effects on PME’s reputation and the reputations of other staff members and could also cause considerable waste of time and effort.

Any deliberately false reporting of a Reportable Matter, whether under this Policy or otherwise, will be treated as a serious disciplinary matter.

## Records

The Whistleblower Protection Officer will maintain a record of all whistleblowing incidents and actions taken under this Policy, so that the Policy can be periodically reviewed.

## Questions

Any questions about this Policy should be directed to the Whistleblower Protection Officer or General Manager.