

## Whistleblower Policy

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## 1. Our Commitment

Genesis Minerals Limited and its related companies (**Genesis** or **Company**) is committed to a culture of respect and ethical conduct in the way we work and relate to each other. We recognise the value of keeping the laws and standards that apply to us in our work and encourage everyone to 'speak up' and report improper, unethical or illegal conduct.

This policy is underpinned by our corporate values of Accountability, Sustainability, People First, Integrity and Results (ASPIRE), which guide our behaviour and apply to every aspect of our business.

## 2. Purpose

This policy is a very important tool for helping Genesis identify Wrongdoing that may not be uncovered unless there is a safe and secure means for disclosing it.

Genesis encourages all employees who have concerns about possible Wrongdoing or inappropriate behaviour within the Company to raise those concerns in the ordinary course of business. There may be times when you do not feel comfortable speaking up in the ordinary course of business, would like to raise your concerns anonymously, or feel that you need confidentiality and protection. In these circumstances, Genesis encourages you to raise concerns about Wrongdoing in accordance with this Whistleblower Protection Policy.

The purpose of this policy is to:

- ▶ encourage genuine concerns about possible Wrongdoing in relation to Genesis to be raised as soon as possible;
- ▶ provide guidance in relation to how to raise those concerns and how they will be investigated, and the support available to individuals raising concerns under this policy;
- ▶ ensure that individuals who disclose Wrongdoing can do so safely, securely and with confidence that they will be protected and supported; and
- ▶ comply with the legislative requirements under the Corporations Act and the Taxation Administration Act to ensure statutory protection is afforded to anyone who makes a Protected Report.

Nothing in this policy is intended to change or take away any other protections which may be available at law. If there is inconsistency between this policy and the provision of relevant legislation, the provisions of the relevant legislation will apply to the extent of the inconsistency.

## 3. Who this policy applies to

This policy applies to our employees, officers, contractors and their employees and any person who is in one of the categories of people set out in section 5.

## 4. What reports are protected under this policy?

To be eligible for the legal protections outlined in this policy, you must:

- a) be an eligible whistleblower (see section 5);
- b) report your concerns to an eligible recipient, to Your Call, or to certain other persons (see section 8); and
- c) have reasonable grounds to suspect Wrongdoing in relation to Genesis (see section 6).

If your report meets all three of the above these criteria, it is a Protected Report.

If your report doesn't meet the above criteria, we still encourage you to raise your concerns with us. However, only Protected Reports receive the legal protections outlined in this policy.

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## 5. Who is an eligible whistleblower?

You are an eligible whistleblower (**Whistleblower**) if you are a current or former:

- a) Genesis officer, employee or associate;
- b) contractor (or contractor employee) who supplies goods or services to Genesis; or
- c) a spouse, relative or dependent of any of the above persons .

## 6. What must a Whistleblower report be about?

### 6.1 What is Wrongdoing?

For the report to be a Protected Report, one of the requirements is that the person making the report has **reasonable grounds** to suspect Wrongdoing is occurring or has occurred. It is not possible to provide an exhaustive list of the activities which should be reported for the purpose of this policy. Generally, Wrongdoing includes any conduct which a Whistleblower has reasonable grounds to suspect:

- a) is about misconduct or an improper state of affairs or circumstances in relation to Genesis or to the tax affairs of Genesis or an associated company, which the Whistleblower considers may assist to perform the functions or duties in relation to the tax affairs of Genesis;
- b) indicates that Genesis or any of its officers or employees has engaged in conduct that:
  - i) involves a breach of or is an offence against any of the following Commonwealth laws: the Corporations Act, the ASIC Act, the Banking Act 1959, the Financial Sector (Collection of Data) Act 2001, the Insurance Act 1973, the Life Insurance Act 1995, the National Consumer Credit Protection Act 1973, or the Superannuation Industry (Supervision) Act 1993, or regulations made under those laws;
  - ii) is an offence against any other Commonwealth law that is punishable by imprisonment of 12 months or more;
  - iii) indicates a systemic issue that a relevant regulator (eg The Department of Local Government, Industry Regulation and Safety (LGIRS)) should know about to properly perform its functions;
  - iv) indicates a significant risk to public safety or the stability of, or confidence in, the financial system, even if it does not involve breach of a particular law; or
  - v) is indicative of dishonest or unethical behaviour or practices that may cause consumer harm.

These matters are referred to as “**Wrongdoing**” in this policy.

### 6.2 Examples of conduct that may be reported as Wrongdoing

Examples of the types of matters that may be reportable as Wrongdoing as part of a Protected Report include, but are not limited to:

- a) Dishonesty, corruption, fraud, money laundering or misappropriation of funds;
- b) Illegal conduct, such as theft, dealing in, or use of illicit drugs, violence or threatened violence, and criminal damage against property;
- c) Offering or accepting a bribe;
- d) Financial irregularities;
- e) Covering up fraud in financial reports;
- f) Unsafe work practices;
- g) Not properly responding to a serious safety issue;
- h) Insider trading;

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- i) Serious inappropriate or unethical conduct such as gross mismanagement or serious and substantial waste of company resources or repeated breaches of administrative procedures;
  - j) Taking or threatening to take detrimental action against a person who has made a disclosure or is suspected to have made, or planning to make a disclosure;
  - k) Deliberate concealment of information tending to show any of the matters listed above.

Generally, Wrongdoing does not include personal work-related grievances. See section 7.

## **7. What should I do if I have a personal work-related grievance?**

Reports that relate solely to personal work-related grievances are not generally considered to be Wrongdoing and are therefore not covered by this policy.

Personal work-related grievances typically relate to an individual's current or former employment arrangements, performance, remuneration outcomes or personal circumstances that do not have significant implications for the organisation (for example an interpersonal conflict between you and another employee, or a decision about your employment that does not breach workplace laws).

Personal work-related grievances should be internally raised using the Genesis Grievance Resolution procedure.

However, sometimes a disclosure of a personal work-related grievance will be Wrongdoing reportable as a Protected Disclosure in accordance with this policy if, in summary:

- a) it includes information about Wrongdoing or information about a personal work-related grievance includes or is bundled with a report of Wrongdoing (mixed report);
- b) it relates to a breach by Genesis of employment or other specified laws punishable by imprisonment of 12 months or more;
- c) it includes information about Wrongdoing beyond an individual's personal circumstances, demonstrates a systemic issue within Genesis, has significant implications for the organisation or indicates that Genesis has engaged in conduct that represents a danger to the public;
- d) concerns detriment to a person because they have or may be considering reporting Wrongdoing; or
- e) it is made to a legal practitioner for the purposes of obtaining advice or legal representation in relation to the operation of the law about whistleblowers.

## **8. Making a Whistleblower report**

The process by which a Whistleblower can make a Whistleblower report is detailed in Attachment 2.

## **9. Protection and support available to Whistleblowers**

If you make a Protected Report, you are entitled to the benefit of certain protections in accordance with the Corporations Act or the Taxation Administration Act. These protections apply regardless of whether you make a Protected Report to one of our Disclosure Officers, to Your Call or to another entity specified in Attachment 1, such as ASIC.

### **9.1 Protecting the Whistleblower's identity**

- a) If you make a Protected Report, your disclosure will be treated as confidential in accordance with legal requirements.
- b) If you make a Protected Report, it is illegal for a person to disclose your identity or information that is likely to lead to identification of your identity, unless:

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- i) you give your consent;
  - ii) the disclosure is required by law; or
  - iii) the disclosure is made to:
    - A. a professional legal advisor (including Genesis' legal team) for the purpose of obtaining legal advice or representation; or
    - B. authorised regulatory bodies, such as ASIC, APRA or a member of the Australian Federal Police.
  - c) However, a person who is dealing with a Protected Report may disclose information that is reasonably necessary for the purposes of investigating the report, provided that the information does not include your identity. If this happens, reasonable steps will be taken to reduce the risk that you will be identified as a result of the report (for example by removing your personal information or other details that are likely to identify you).
  - d) To maintain confidentiality of a Whistleblower's identity, Genesis will:
    - i) ensure personal information or references to the Whistleblower's identity is redacted in all investigation and reporting documents;
    - ii) refer to the Whistleblower in gender-neutral terms;
    - iii) where possible, contact the Whistleblower to help identify certain aspects of their disclosure that could inadvertently identify them;
    - iv) ensure that the information a Whistleblower provides and all materials relevant to a Protected Report are held securely with access limited only to the individuals necessary to investigate your Protected Report, and to support and protect the Whistleblower; and
    - v) take reasonable steps to ensure its personnel understand the requirements of this policy.
  - e) You should also be aware that during an investigation, it may be necessary for us to tell the people who are believed to be involved in the Wrongdoing about the alleged Wrongdoing. This is to ensure a fair investigation and provide those people with an opportunity to respond to the allegations. Although we will not tell these people your identity unless you give consent, it is possible that the details of the report may lead them to believe that they know the identity of the Whistleblower.
  - f) You should also be aware that it is possible for people to guess your identity if:
    - i) you previously mentioned to other people that they are considering making a disclosure;
    - ii) you are one of a very small number of people with access to the information; or
    - iii) your disclosure relates to information that you have previously been told privately and in confidence.
  - g) Any breach of confidentiality will be treated as a serious matter and may be the subject of disciplinary action up to and including dismissal or termination of engagement with Genesis. Breaches of Whistleblower confidentiality are also an offence under the Corporations Act and the Taxation Administration Act and serious penalties apply for both individuals and corporations.
  - h) If you believe your confidentiality as a Whistleblower has been breached, you can make a complaint to one of the Disclosure Officers tabled in Attachment 2 or by contacting Your Call. You can also lodge a complaint with ASIC, APRA or the ATO.

## **9.2 Protection against detrimental conduct**

- a) Genesis is committed to protecting the rights of Whistleblowers who have made Protected Reports and will not tolerate any detriment or threats of detriment against them or any other person (e.g. suspected whistleblowers or people who participate in investigations).
- b) It is unlawful to cause, or threaten to cause, detriment to a person because they or someone else has made, may have made, proposes to make or could make a Protected Report and serious penalties apply for both

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individuals and corporations. A person who is subject to such detriment may also seek compensation or other remedies from a Court if they have suffered loss, damage or injury because of a Protected Report or because Genesis failed to take reasonable precautions and exercise due diligence to prevent the detriment.

- c) "Detriment" includes dismissal, suspension, demotion, or termination of your employment or engagement with us; changes to your employment, position, or duties to your disadvantage; discrimination; harassment or intimidation; harm or injury (including psychological harm); damage to property, reputation, business or financial position; or any other damage.
- d) The following actions are not considered to be detriment:
  - i) reasonable administrative action taken to protect a Whistleblower from detriment (e.g. relocating them to another office to prevent victimisation);
  - ii) managing unsatisfactory work performance of a Whistleblower, in line with Genesis Minerals usual performance management framework.
- e) Genesis will protect Whistleblowers from detriment arising from making a Protected Report by:
  - i) conducting a risk assessment of the disclosure to manage the risk of detriment to the Whistleblower;
  - ii) where applicable, making such reasonable adjustments as required to allow the Whistleblower to perform their duties at work without being potentially exposed to detriment (eg by changing reporting lines or location);
  - iii) implementing strategies to help the Whistleblower minimise and manage stress, time or performance impacts or other challenges resulting from the disclosure or its investigation;
  - iv) making available support services such as access to Genesis' independent Employee Assistance Program (EAP).
- f) If you believe you have suffered detriment, you are encouraged to obtain independent legal advice in relation to your rights. You can make a complaint to one of the Disclosure Officers as tabled in Attachment 2 or by contacting Your Call. You can also lodge a complaint with ASIC, APRA or the ATO.

### **9.3 Protection for Whistleblowers against litigation**

If you make a Protected Report, you are protected against civil, criminal (other than for making a false disclosure) or administrative legal actions arising out of your reporting.

You are still responsible for your own actions. These protections do not prevent action being taken against you for any Wrongdoing that you are involved in that is revealed in your report.

### **9.4 Other support available for Whistleblowers**

- a) We will support you while your Protected Report is being handled by Genesis.
- b) If necessary, Genesis will appoint a Protection Officer to arrange or coordinate support and protection for Whistleblowers who have made or are in the process of making a Protected Report. A Whistleblower can contact a Discloser Officer to discuss how a Protection Officer may be able to provide support and protection.
- c) The role of the Protection Officer is to:
  - i) assess the immediate welfare and protection needs of a Whistleblower;
  - ii) safeguard the interests of a Whistleblower in accordance with this policy and the law; and
  - iii) address any issues or concerns of detriment.
- d) Employees may also contact our Employee Assistance Program by calling Lifeskills: 1800 870 080.

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## 10. How we handle Protected Reports

Any person who receives a Whistleblower report made under this policy must ensure that the report is managed in compliance with this policy and any relevant procedures. This is to ensure that the protections available for the Whistleblower are not compromised and that Genesis meets its legal obligations.

### 10.1 How do we investigate reports of Wrongdoing?

- a) Reports of alleged Wrongdoing made in accordance with this policy will be treated seriously and where appropriate, will be thoroughly investigated by Genesis in accordance with this policy.
- b) After receiving a report about Wrongdoing we will assess the information provided to determine whether it is a Protected Report, how it will be handled and whether an investigation is required. The precise steps to be taken to investigate a report will differ in individual cases but may include:
  - i) determination of the nature and scope of an investigation;
  - ii) appointment of an internal or external investigator (if it has been determined that an investigation is required), who is able to conduct the investigation in a fair, objective and independent manner;
  - iii) the investigator or other person asking the Whistleblower whether they consent to their identity being disclosed to investigate the report;
  - iv) interviewing the Whistleblower and any other relevant person to obtain information about the report;
  - v) determination of the nature of any technical, financial or legal advice that may be required to support the investigation;
  - vi) review of relevant documents and other information in relation to the report;
  - vii) the investigator making findings regarding the conduct reported.
- c) Generally, if the Whistleblower can be contacted, we will confirm receipt of their disclosure within 2 Business Days. The investigation of a Protected Report will commence as soon as reasonably possible from the date we receive it. However, there may be reasons why an investigation may take longer. If we think there might be a delay with the investigation, we will tell the person who made the Protected Report (where possible).
- d) Where possible and assuming that the identity of the Whistleblower is known, the Whistleblower will be kept informed of when the investigation process has begun, while the investigation is in progress and after the investigation has been finalised, subject to confidentiality and privacy considerations.
- e) Genesis may decide to take action in response to any findings which may include, but is not limited to, disciplinary action, reporting the matter to an appropriate regulator, conducting training or addressing procedural and policy deficiencies.

### 10.2 Treatment of employees who are the subject of a Whistleblower report

- a) Genesis will take all reasonable steps to ensure that any employee who is the subject of a Protected Report is afforded fair treatment and an impartial investigation in accordance with this policy. Generally, when an investigation is conducted, employees who are the subject of a Protected Report may be, within the constraints of confidentiality:
  - i) told about the substance of the allegations;
  - ii) given a fair and reasonable opportunity to respond to the allegations before the investigation is finalised; and
  - iii) informed about the findings of the investigation and given an opportunity to respond to those conclusions before any action is taken against them (subject to legal, privacy and confidentiality requirements).
- b) Before providing any information to an employee who is the subject of a Protected Report we will:

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- i) make sure the information does not include your identity;
  - ii) make sure we have taken all reasonable steps to reduce the risk that you will be identified from the information; and
  - iii) only provide information that is reasonably necessary for investigating the issues raised in the Protected Report.
- c) Employees who are the subject of a Protected Report may access Genesis' independent Employee Assistance Program (EAP) for additional support.
  - d) If you are not satisfied with our response, you may lodge a report or complaint with ASIC, APRA or the ATO in accordance with the law.

## 11. Reporting to the Board

- a) The Board (or Audit & Finance Committee in so far as those reports relate to financial matters) may be provided with details of whistleblowing reports and any findings to ensure sufficient oversight of reports and investigation of matters raised under this policy.
- b) The Board will monitor the whistleblower management system to ensure that the broader trends, themes and/or emerging risks highlighted by the disclosures made under this policy are addressed and mitigated as part of the Company's risk management and corporate governance.

## 12. Review, Access, Training and Further Information in relation to this policy

- a) This policy will be available to officers and employees of Genesis via our website at <https://genesisminerals.com.au/sustainability/corporate-governance/> to ensure it is accessible for all Whistleblowers.
- b) This policy may be reviewed and amended from time to time and will be reviewed by Genesis at least every two years.
- c) The GM People and Culture and General Counsel will be responsible for conducting upfront and ongoing education and training on the whistleblower policy, processes and procedures to all officers and employees.
- d) If you require further information in relation to this policy, or how to make a Protected Report, you can contact GM People & Culture or any of the listed Disclosure Officers.

## 13. Definitions

**APRA** means Australian Prudential Regulation Authority

**ASIC** means Australian Securities & Investments Commission

**ASIC Act** means *Australian Securities and Investments Commission Act 2001* (Cth)

**ATO** means the Australian Taxation Office

**Board** means the board of directors of the Company

**Corporations Act** means *Corporations Act 2001* (Cth)

**Detriment** has the meaning specified in section 9.2.

**Disclosure Officer** means a person appointed by Genesis as the preferred recipient of internal disclosures made under this policy. The Disclosure Officers' details are set out in the table in Attachment 2.

**Executive Management Team** means the executive management team of the Company from time to time.

**Protected Report** is defined in section 4.

**Site General Manager** means the responsible manager of the operation or operations.

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**Taxation Administration Act** means *Taxation Administration Act 1953* (Cth)

**Whistleblower** means a person who falls within one of the categories described in section 5 of this policy and who makes a report of Wrongdoing, based on reasonable grounds, to one of the people tabled in Attachment 2.

**Wrongdoing** is defined in section 6.1.

### Policy information

<b>Version:</b>	<b>1.0</b>
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<b>Reviewed:</b>	
<b>Review frequency:</b>	<b>Every 2 Years</b>
<b>Responsible team/position:</b>	<b>Genesis Board of Directors</b>

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## Attachment 1 – Who can a Whistleblower report be made to?

To be protected, the report may be made to:

- ▶ A Disclosure Officer, as specified in the table within Attachment 2;
- ▶ Genesis Minerals Limited's external whistleblowing service, Your Call, as specified in Attachment 2;
- ▶ A director or officer of the Company;
- ▶ Site General Manager;
- ▶ For reports in relation to taxation matters only:
  - Chief Financial Officer
  - Chair of the Audit & Finance Committee
- ▶ In accordance with the Corporations Act, a whistleblowing report may also be made externally to one of the following:
  - A legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the whistleblower provisions in the Corporations Act;
  - ASIC, APRA or a Commonwealth authority prescribed under the Corporations Act (see ASIC [Information Sheet 239 How ASIC handles whistleblower reports](#) for more information);
  - An actuary, auditor or member of an audit team conducting an audit of Genesis Minerals Limited.
- ▶ A report under the Taxation Administration Act may also be made externally to:
  - A legal practitioner for the purposes of obtaining legal advice or legal representation;
  - The Commissioner for Taxation;
  - A registered tax agent or BAS agent who provides tax agent services to Genesis Minerals Limited; or
  - An auditor or member of the audit team conducting an audit of Genesis Minerals Limited.

### Public interest disclosures

You may make a disclosure in the public interest to a member of parliament or a journalist if:

- ▶ you have previously made that disclosure to ASIC, APRA or another Commonwealth body prescribed by regulation; and
- ▶ at least 90 days have passed since the disclosure was made you do not have reasonable grounds to believe that action is being, or has been, taken to address the misconduct to which the previous disclosure related; and
- ▶ you have reasonable grounds to believe that making a further disclosure of the misconduct would be in the public interest; and
- ▶ after the end of the 90-day period you notify the body to whom you made the disclosure (ASIC, APRA or other Commonwealth body) in writing with sufficient information to identify the previous disclosure, and state that you intend to make a public interest disclosure to a member of parliament or a journalist; and
- ▶ the extent of the information disclosed in the public interest disclosure is no greater than is necessary to inform the recipient of the misconduct or the improper state of affairs or circumstances.

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## Emergency disclosures

You may make an emergency disclosure to a member of parliament or a journalist if:

- ▶ you previously made that disclosure to ASIC, APRA or another Commonwealth body prescribed by regulation;
- ▶ you have 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;
- ▶ you notify the body to whom you made the disclosure (ASIC, APRA or other Commonwealth body) in writing with sufficient information to identify the previous disclosure, and state that you intend to make an emergency disclosure to a member of parliament or a journalist;
- ▶ the extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the recipient of the substantial and imminent danger.

It is important to understand that a report may only be made to a journalist or a parliamentarian in the circumstances described above. You should seek independent legal advice before making a public interest disclosure or an emergency disclosure to a member of parliament or a journalist.

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## Attachment 2 – Making Whistleblower reports

### How can a Whistleblower report be made?

We encourage you to report actual or suspected Wrongdoing initially (and promptly) to your line manager or usual Genesis Company contact, as soon as you become aware of it. Genesis would like to identify and address any Wrongdoing as soon as possible.

If you are not satisfied with the response of your supervisor, line manager or usual Genesis Company contact, complaints or reports should generally be made to a member of the Executive Management Team, who will report the issue to a Disclosure Officer.

If you do not want to involve a member of the Executive Management Team, you may make a confidential report to a Disclosure Officer.

Our Disclosure Officers are

Name	Role	Email
Joanne Steer	General Counsel & Joint Company Secretary	whistleblower@genesisminerals.com.au
Morgan Ball	Chief Financial Officer	
Chris Yeo	General Manager, People & Culture	

Alternative to the above, you may make a report using our whistleblowing service, Your Call. Your Call is an external, independent provider that provides confidential reporting of Whistleblower concerns related to this policy. Reporting to Your Call also enables your report to be made anonymously if you choose to do so. You can make a Whistleblower report to Your Call:

- a) Online: [Rely: Report](#)
- b) By phone using Your Call's external reporting hotline: 1300 790 228 (7am to midnight AEST on business days).

### How Your Call works

Your Call uses an online message board which you will have access to after making the report. The message board allows you to:

- ▶ communicate with Your Call and with Genesis with or without revealing your identity;
- ▶ securely upload any relevant documentation and/or material that you wish to provide;
- ▶ receive updates; and
- ▶ request support or report detriment.

Your Call will provide Genesis' Disclosure Officers with a copy of your report and any relevant documents or records provided by you to Your Call. If your report relates to a Disclosure Officer, Your Call will exclude that person from all communications when Your Call provide information about your report to us.

### How to use Your Call if you have a speech or hearing impairment

If you are deaf or have a hearing or speech impairment, you can contact Your Call online. If you would like to contact Your Call by phone, you can do so through the National Relay Service. Simply choose your contact method at [www.relayservice.gov.au](http://www.relayservice.gov.au) and request Your Call's hotline 1300 790 228.

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**You can also make a report in person, in writing, verbally or by telephone directly to an external auditor or actuary of the Company, a senior manager or officer of the Company (i.e. a member of the Board or the Executive Management Team), or Site General Manager.**

**Can I remain anonymous when making a report?**

- a) You can remain anonymous when making a Protected Report. There is no requirement to provide your name or identify yourself at any stage during the reporting or investigation process or after the investigation is finalised. You can also decide not to answer questions that you feel may reveal your identity. You can also choose to provide your identity to the person that you are making the report to but not consent to them sharing your identity with anyone else.
- b) We will respect your right not to identify yourself. However, if you choose to remain anonymous, this may affect the ability of Genesis to investigate and properly communicate with you about the report.

Genesis encourages disclosers who would prefer to remain anonymous to maintain ongoing two-way communication with Genesis so that Genesis can ask follow-up questions and provide feedback. This can also be done using the Your Call service which provides for ongoing anonymous communication.

**Disclosure to be made with reasonable grounds**

- a) To obtain whistleblower protection under the legislation, report must be made with reasonable grounds. In practice, this means that there is more than just a suspicion of potential Wrongdoing and there is some information that supports the allegation. You do not need to prove the allegations, but you are encouraged to provide evidence in support of your disclosure if it is safely available.
- b) A Whistleblower can still qualify for protection even if their Protected Report turns out to be incorrect or unsubstantiated provided they have a reasonable basis for making the report.

**False reporting**

False reporting will be treated seriously. If we find that you have intentionally made a false report (for example, if you know a report is untrue and you report it to harm, annoy, or cause distress to someone), we may take disciplinary action against you.