



# swift NETWORKS

**SWIFT NETWORKS GROUP LIMITED  
("COMPANY")  
(ACN 006 222 395)  
WHISTLEBLOWING POLICY**

## **1. Purpose**

1.1 Swift is committed to conducting its business with honesty and integrity, and we expect all employees to maintain the same high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.

1.2 The purpose of this policy is to:

- Encourage employees to report suspected wrongdoing as soon as possible, with the knowledge that their concerns will be taken seriously and investigated as appropriate and that their confidentiality will be respected;
- Provide employees with guidance when reporting allegations of suspected misconduct or improper activities; and
- Reassure employees that they can raise genuine concerns in good faith without fear of reprisals, even if they turn out to be mistaken.

## **2. Who is covered by this Policy?**

The policy applies to all employees at all levels of the organisation, including senior managers, officers, directors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term workers and casual staff (collectively referred to as "Employee" or "Employees") of Swift Networks Group Limited and all its subsidiaries (collectively referred to as 'Swift').

## **3. What is unacceptable conduct?**

Unacceptable conduct covered by this policy includes any conduct which:

- Is dishonest, fraudulent or corrupt;
- Is illegal, such as theft, drug sale or use, violence, harassment and intimidation, criminal damage to property or other breaches of state or federal law;
- Is unethical, such as dishonesty altering company records or data, dishonestly altering records or documents provided by Swift to any regulators and third parties or adopting questionable accounting practices;

- Is potentially damaging to a Swift person, such as unsafe work practices, or substantially wasting of company resources;
- Is potentially damaging to Swift's reputation;
- May cause financial loss to Swift or be otherwise detrimental to Swift's interests;
- Involves any other kind of serious impropriety; or
- Jeopardises or potentially jeopardises the ability of Swift to hold required licenses for its business.

#### **4. What is whistleblowing?**

- 4.1 Whistleblowing is the disclosure of information which relates to suspected unacceptable conduct.
- 4.2 A whistleblower is a person who raises a genuine concern in good faith. If you have any genuine concerns related to suspected unacceptable conduct you should report it under this policy.

#### **5. Raising a whistleblowing concern**

- 5.1 Employees are strongly encouraged to report actual or suspected illegal or unacceptable conduct or any breach or suspected breach of law or regulation that may adversely impact Swift, Swift's shareholders, employees, investors, associated interests or the public at large.
- 5.2 Swift maintains mechanisms for all employees, consultants, contractors, agents, customers, suppliers and service providers to report actual or suspected instances of illegal or unacceptable conduct.
- 5.3 Instances of behaviour involving possible fraud, bribery and corruption may be reported by employees, consultants, contractors, agents, customers, suppliers and service providers in the following manner:
- Chief Financial Officer on +61 8 6103 7595 or [george.nicholls@swiftnetworks.com.au](mailto:george.nicholls@swiftnetworks.com.au)
  - Swift will make the details available to all employees.
- 5.4 Employees, consultants, contractors, agents, suppliers and service providers may feel that in some circumstances they wish to report suspected incidents anonymously.
- 5.5 Swift encourages the disclosure of acts of illegal or unacceptable conduct in writing, to assure a clear understanding of the issues raised. A Whistleblower Report Form is attached at Appendix 1.
- 5.6 All Whistleblower Report Forms should be sent to the Chief Financial Officer.
- 5.7 The sender will receive acknowledgement of receipt of the reported actual or suspected illegal or unacceptable conduct within five business days.

#### **6. Investigating alleged misconduct or improper activities**

- 6.1 The Chief Financial Officer will assess the nature of the complaint and determine an appropriate response to the allegations.

6.2 Upon review of the facts of the suspected illegal or unacceptable conduct, the Chief Financial Officer will, in consultation with the Chairman, determine the appropriate form of investigation.

6.3 Upon conclusion of an appropriate course of action, the Chief Financial Officer will inform, to the extent necessary, the notifying party, if identified, of the outcome of any investigation conducted or decision made.

## **7. Outcome of investigations**

7.1 The Chief Financial Officer shall communicate the results of the completed investigations to the Chairman.

7.2 At the end of the investigation, the Chairman will determine the appropriate response. This response will include rectifying any unacceptable conduct and taking any action required to prevent any future occurrences of the same or similar conduct.

7.3 Where issues of discipline arise, the response will be in line with Swift's procedures for disciplinary matters. Where allegations of unacceptable conduct made against another person cannot be substantiated, that person will be advised accordingly and will be entitled to continue their role as if the allegations had not been made.

7.4 A person who has committed or been involved in unacceptable conduct will not be immune from disciplinary action merely because they have reported the unacceptable conduct in accordance with this policy. However, the person's conduct in making the report is likely to be taken into account in determining what disciplinary action is appropriate.

7.5 If the Chairman concludes that a whistleblower has made false allegations maliciously, in bad faith or with a view to personal gain, the whistleblower will be subject to disciplinary action.

## **8. Protection and support for whistleblowers**

8.1 Swift recognises that people do not generally decide to publicly express serious concerns about the integrity of their employer or their work colleagues without a good deal of prior thought. Provided that concerns are raised in good faith, the employee will not be at risk of losing their job or suffering any form of reprisal, including being labelled a troublemaker, for coming forward, irrespective of the outcome of any subsequent investigation.

8.2 If an employee makes a report of unacceptable conduct under this policy, Swift will endeavour to ensure that person's identity is protected from disclosure. Accordingly, Swift will not disclose the employee's identity unless:

- The employee making the report consents to the disclosure;
- The disclosure is required by law;
- The disclosure is necessary to prevent or lessen a serious threat to person's health or safety; or
- It is necessary to protect or enforce Swift's legal rights or interests or to defend any claims.

8.3 Swift will also ensure that any records relating to a report of unacceptable conduct

are stored securely and are only accessible by authorised staff.

- 8.4 Employees must not suffer any detrimental treatment as a result of raising a concern in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Chief Financial Officer immediately.
- 8.5 Employees must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

APPENDIX 1

WHISTLEBLOWER REPORT  
FORM

REPORTER'S CONTACT INFORMATION	
NAME	
CONTACT NUMBER	
EMAIL ADDRESS	
SUSPECT'S INFORMATION	
NAME	
CONTACT NUMBER	
EMAIL ADDRESS	
WITNESS INFORMATION (IF ANY)	
NAME	
CONTACT NUMBER	
EMAIL ADDRESS	
COMPLAINT:	
1.	WHAT MISCONDUCT/IMPROPER ACTIVITY OCCURRED?
2.	WHO COMMITTED THE MISCONDUCT/IMPROPER ACTIVITY?
3.	WHEN DID IT HAPPEN AND WHEN DID YOU NOTICE IT?
4.	WHERE DID IT HAPPEN?

5. CAN YOU PROVIDE US WITH EVIDENCE?

6. ARE THERE ANY OTHER PARTIES INVOLVED OTHER THAN THE SUSPECT STATED ABOVE?

7. DO YOU HAE ANY OTHER DETAILS OR INFORMATION WHICH COULD ASSIST US IN THE INVESTIGATION?

8. ANY OTHER COMMENTS?

DATE:

SIGNATURE: