

Purpose

Papyrus is committed to the highest standards of conduct and ethical behaviour in our business activities and to promoting and supporting a culture of honest and ethical conduct, corporate compliance and appropriate risk management.

Whistleblowing is the disclosure or reporting of a person or organization regarded as engaging in suspected unethical, illegal, fraudulent or undesirable conduct or wrongdoing.

Papyrus encourages all employees to report suspected wrongdoing involving the Company, to deter future wrongdoing, increase awareness of ethical conduct and promote better compliance to the company Code of Conduct.

The objectives of this Policy are to:

1. encourage the reporting of suspected or actual wrongdoing;
2. protect and support the dignity, wellbeing, career and good name of disclosing persons who report suspected or actual wrongdoing;
3. help deter wrongdoing and support and enhance the Company's long-term sustainability and reputation;
4. support the Company's values and develop a culture of accountability and continuous improvement;
5. outline how disclosures will be dealt with and ensure that disclosures are dealt with appropriately and on a timely basis; and
6. comply with the whistleblowing provisions contained in Part 9.4AAA of the Corporations Act 2001 (Cth) (Corporations Act).

Scope

This policy applies to all directors and employees of the company.

Requirements

Concerns that should be reported

All employees are encouraged to report any genuine matters or behaviours that they honestly believe contravenes the Company's Code of Conduct or the law. For the purposes of making a report under this Policy, matters may include any actual or suspected:

1. Conduct or practices which are illegal or a breach of the law;
2. Breach of any of the Company's Code of Conduct;
3. Corrupt activities;
4. Theft, fraud, or misappropriation;
5. Significant mismanagement or waste of funds or resources;
6. Abuse of authority;
7. Serious harm to public health, safety or environment or the health and safety of any Company employee; or
8. Any action taken out against or harm suffered by an employee as a result of making a report under this policy.

How and to whom you can make a disclosure

You need to make a disclosure directly to one of the entity's eligible recipients to be able to qualify for protection as a Whistleblower under the Corporations Act.

The Papyrus eligible recipients include the MD / CEO, the Secretary, the Chair or the external auditor (this can be found in the Annual Report). The act also allows for reporting to a Senior Manager.

The CEO or Chair may determine the matter is a general grievance matter or other matter of a kind not covered by the Corporations Act (eg HR matter covered by the Fair Work Act) and plan how it will be treated. They may determine the matter requires oversight by our Whistleblower Protection Officer as a Disclosable Matter which is a matter that falls under and requires compliance with the Corporations Act.

Papyrus Whistleblower Protection Officer:

Mr Daniel Schmidt
Mobile 0419 242 885
Email Daniel@papyrusaustralia.com.au

You are entitled to the various legal protections that are available under the Corporations Act, (if applicable), and the Whistleblower Protection Officer can plan how the matter should be investigated or managed.

In addition, disclosures to a legal practitioner, ASIC, APRA or the ATO are permitted under the Act.

Support for you as a discloser

Papyrus has a legal obligation to protect the confidentiality of a discloser's identity.

All reported concerns will be investigated appropriately and where appropriate feedback regarding the investigation's outcome will be provided to you.

The necessary course of action will be taken in response to a report and if no action is taken, you will be provided with an explanation.

The report will not be disclosed to anyone except those that are actively involved in investigating the matters raised in the report, the CEO (unless the matter involves the CEO) and the Board (excluding any director of the Board the matter involves), subject to ensuring full compliance with the Corporations Act as applicable.

Protection for you as a discloser

Papyrus will provide protection from discrimination or disadvantage in employment with the Company, following a report in accordance with this policy or any reprisals due to actions in making a report.

Papyrus will take all reasonable steps to ensure that adequate and appropriate protection is being provided to those who, in good faith, make a report. This protection applies if the matter is proven or not.

Whistleblowing is not about airing a grievance. It is about reporting real or perceived malpractice. A report may damage the career prospects and reputation of people who are the subject of serious allegations and therefore if your report is not made in good faith or is found to be malicious, deliberately misleading, or frivolous, you may be subject to disciplinary action which may include termination of employment.

Responsibility

The Board of Directors are responsible for approval of this policy.

The Executive Management team are responsible for communication and deployment of the policy.
The Executive Management team is responsible for ensuring that the Board is informed of any material incidents reported under this Whistleblower policy.

Review

This policy shall be reviewed three years from the date of approval by the Board of Directors.

Authorised on behalf of Papyrus Australia:

Ted Byrt

Chair - Papyrus Australia

January 2023