

Whistleblowing Policy

1. Policy

1.1 Policy Statement

Open Doors Australia and New Zealand (Open Doors) is committed to the highest standards of ethical conduct, integrity and sound corporate governance, consistent with our Christian values, and desire to honour God in all that we do. We seek to reflect the biblical mandate for truth, justice, and love for all people, and are committed to treating all individuals involved in whistle-blowing disclosures with fairness and dignity.

To foster a culture of transparency and accountability, the Board and Management actively encourage the reporting of any actual or suspected wrongdoing. The Whistleblowing Policy supports that commitment by providing a safe and confidential mechanism for eligible individuals to disclose serious concerns and ensures protection against reprisal for those who speak up in good faith.

1.2 Scope

This policy applies to all current and former employees, directors (officers), consultants and third- party suppliers (and their employees) of Open Doors Australia and Open Doors New Zealand, as well as their relatives, spouses and dependents.

Any person who discloses suspected or actual wrongdoing under this policy is considered an **eligible whistleblower**. Eligible whistleblowers are entitled to legal protections under applicable legislation, including the Corporations Act 2001 (Cth) in Australia, and the Protected Disclosures (Protection of Whistleblowers) Act 2022 in New Zealand. This policy is designed to complement, not override those legal rights.

2. Responsibilities

2.1 Board of Directors

The Organisation's Board is responsible for:

- adopting and periodically reviewing the Whistleblower Policy;
- Nominating the organisation's Whistleblower Protection Officer (WPO);
- Ensuring appropriate oversight of whistleblower processes and protections.

2.2 Chief Executive Officer (CEO)

The CEO is responsible for:

- Implementing the Whistleblower Policy across the organisation;
- Ensuring investigations are adequately resourced and conducted with integrity;
- Promoting a culture of transparency and safety for whistleblowers.

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2.3 Whistleblower Protection Officer (WPO)

The WPO is responsible for:

- Receiving and reviewing whistleblower disclosures, as an authorised recipient;
- Overseeing the protection and welfare of whistleblowers, including safeguarding their identity and ensuring they are not subject to detriment;
- Coordinating investigations into whistleblower reports, including appointing a case manager where appropriate;
- Ensuring all reports and investigations are documented, handled confidentially, and resolved in a timely and impartial manner;
- Finalising investigation and reporting outcomes to relevant governance bodies.

2.4 Case Manager (if appointed)

If a case manager is appointed, they are responsible for:

- Conducting a thorough and impartial investigation into the report;
- Engaging with the whistleblower to gather relevant information;
- Ensuring findings are documented and communicated to the WPO.

3. Making a Disclosure

Open Doors encourages the disclosure of information related to actual or suspected wrongdoing or misconduct. The Organisation is committed to fostering a safe culture in which individuals feel empowered to speak up, and to providing protections when disclosures are made in good faith. This policy outlines a clear process to ensure the safety of whistleblowers and transparency in how disclosures are handled.

3.1 What Can Be Disclosed

Eligible whistleblowers are encouraged to disclose information about actual or suspected wrongdoing that affects the organisation. Disclosable include breaches of law, internal policy, or ethical standards. Examples of conduct that may be disclosed under this policy include:

- Illegal conduct of any nature;
- fraud, corruption, money laundering or misappropriation of funds;
- offering or accepting a bribe;
- financial irregularities or maladministration;
- failure to comply with, or breach of, legal or regulatory requirements;
- endangering the health or safety of staff, volunteers or the general public;
- engaging in or threatening to engage in detrimental conduct to staff, volunteers, contractors or others who have made, or plan to make, a protected disclosure;
- conduct that damages Open Doors' brand or relationship with third parties;
- breach of internal policy, such as the Code of Conduct or Conflicts of Interest; and
- harassment or unlawful discrimination.

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Concerns that are not illegal or are minor in nature should be raised through existing internal channels. These include speaking with a manager, using Workplace Health and Safety systems, or referring to relevant internal policies such as the Grievance Policy.

To be protected under this policy, a whistleblower must have reasonable grounds to suspect that the disclosed conduct has occurred. Disclosures that do not relate to the matters listed above may not qualify for protection under the *Corporations Act 2001 (Cth)*.

3.2 How to Make a Disclosure

Eligible whistleblowers may make a disclosure through several channels, depending on the nature of the concern and the individuals involved. Disclosures can be made to:

- The **Whistleblower Protection Officer (WPO)**;
- The **Chief Executive Officer (CEO)**, unless the CEO may be implicated in the matter;
- The **Chair of the Board**, if senior leadership may be implicated.

Reporting Channels

Whistleblowers can report concerns through the following secure and confidential channels:

- **Secure email:** whistleblower@od.org.au
- **Secure email** to the Executive Director: People, Culture & Enablement, who serves as the WPO.
- **Post** to the ED: People, Culture & Enablement

Executive Director: People, Culture & Enablement
Open Doors Australia and New Zealand
11/10 Gladstone Rd
Castle Hill, NSW 2154

- **In person**, by appointment
- **Online** Via the Whistleblowing Disclosure Form on the Open Doors Australia or Open Doors New Zealand website:
 - [Whistleblowing Disclosure Form \(Australia\)](#)
 - [Whistleblowing Disclosure Form \(New Zealand\)](#)
- **To external authorities** responsible for law enforcement or regulatory oversight in the relevant jurisdiction.

Monitoring of Reporting Channels

Reports submitted via the email and webform channels are monitored exclusively by the Whistleblower Protection Officer (WPO) to ensure confidentiality and timely response. Reports made directly to external authorities are outside the organisation's monitoring and control.

For clarity, the WPO is the Executive Director: People, Culture & Enablement. All references to 'WPO' in this policy refer to this position.

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Information to Include in a Disclosure

To assist the investigation process, whistleblowers are encouraged to provide in written details where possible, including:

- The nature of the alleged misconduct;
- The individuals involved;
- The basis for the whistleblower's belief that misconduct has occurred.
- Any supporting evidence or references to where such evidence may be found.

All disclosures will be treated confidentially and assessed in accordance with this policy and applicable legislation.

3.3 Confidentiality and Anonymity

Open Doors is committed to treating all disclosures with strict confidentiality, whether the eligible whistleblower chooses to identify themselves or remain anonymous. All disclosure and investigation records will be securely stored with restricted access, and any interviews or communications with staff or third parties will be conducted discreetly and respectfully.

Eligible Whistleblowers may choose to remain anonymous when making a protected disclosure. This choice will be respected unless disclosure is required by law or necessary to prevent serious harm. While anonymous disclosures are accepted, they may limit Open Doors' ability to:

- Seek further information to support the investigation;
- Provide updates on the progress or outcome of the investigation;
- Offer support or protection to the whistleblower.

The Whistleblower Protection Officer (WPO) will take all reasonable steps to maintain confidentiality and protect the identity of the whistleblower throughout the process.

4. Handling and Investigation of Disclosure

4.1 Investigation process

Upon receipt of a disclosure, the following steps will be taken:

1. The eligible whistleblower makes a disclosure to the Whistleblower Protection Officer (WPO), or to another authorised recipient.
2. The WPO acknowledges receipt of the disclosure and, where appropriate, appoints a case manager to assess and manage the investigation.
3. The Chair of the Board is notified that a protected disclosure has been received. The full Board may be informed, depending on the nature and sensitivity of the matter.
4. Unless the disclosure implicates the CEO, the CEO is also informed. If the CEO is implicated, the Chair (or Company Secretary, if the Chair is implicated) will be informed instead.
5. The case manager conducts a preliminary assessment to determine whether the disclosure qualifies for investigation. This is conducted in consultation with the WPO and CEO (or Chair, if the CEO is implicated).

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6. If an investigation proceeds, the case manager leads the process, which may include corresponding with the eligible whistleblower (if contact is possible).
7. Relevant witnesses are interviewed, and supporting documentation is reviewed.
8. Detailed records are kept of all interviews, discussions, and evidence gathered.
9. The case manager provides regular updates to the WPO and CEO (or Chair, if applicable), and to the whistleblower where possible.
10. Upon completion, the case manager prepares a findings report and submits it to the CEO and Chair (or to the appropriate party if either is implicated).

All information will be handled with strict confidentiality, and access will be restricted to those directly involved in the investigation.

4.2 Findings

At the conclusion of the investigation, a formal report will be prepared. The report includes:

- A summary of the allegations;
- A statement of relevant findings of fact and the evidence relied upon;
- Conclusions reached, including any impact on Open Doors or affected individuals;
- Recommendations for remedial action or further steps.

The report will be submitted to the CEO and Chair for appropriate action. If the disclosure relates to the CEO, the report will be submitted solely to the Chair. If it relates to the Chair, it will be submitted to the Company Secretary.

4.3 Information to the Eligible Whistleblower

Open Doors is committed to keeping the whistleblower informed, where possible, about the progress and outcome of the investigation, subject to privacy, legal and confidentiality considerations. If the whistleblower has chosen to remain anonymous and no communication channel exists, the findings will be securely stored, and a summary will be noted in the minutes of the next Board meeting.

4.4 Request for Formal Review

If the whistleblower is not satisfied with the outcome of the investigation, they may request a formal review. This request must be submitted in writing to the CEO, or to the Chair if the CEO was involved in the original investigation.

While Open Doors will consider all requests for review, it is not obligated to reopen an investigation unless new information or procedural concerns warrant it. The CEO or Chair will determine whether the review proceeds.

Open Doors strictly prohibits retaliation against any individual involved in a disclosure or investigation. If a whistleblower believes they are experiencing retaliation, they should immediately contact the WPO. If unresolved, the matter may be escalated in writing to the CEO or Chair for further action.

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5. Other Policies and References

5. 1 Other Policies

This policy should be read in conjunction with other relevant Open Doors policies, including:

- Open Doors International Whistleblower policy
- Staff Code of Conduct
- Bullying and Harassment Policy
- Discrimination Policy
- Delegation of Authority Policy
- Conflict of Interest Policy
- Risk Management Policy

5. 2 External references

This policy is informed by the following legislation and regulatory guidance:

Australia

- [ASIC Whistleblowing Guidance](#)
- [ACNC Whistleblower Protections Factsheet](#)

New Zealand

- [New Zealand Ombudsman: Serious wrongdoing at work \(protected disclosure\)](#)
- [Protected Disclosures \(Protection of Whistleblowers\) Act 2022](#)

6. Glossary of Key Terms

Open Doors or The Organisation: Refers to Open Doors Australia and Open Doors New Zealand, including any associated entities.

Eligible Whistleblower: A person who, whether anonymously or not, makes, attempts to make, or intends to make a disclosure of reportable conduct under the protection of relevant legislation. This includes current and former employees, officers, contractors, suppliers (and their employees), and their relatives, spouses or dependents.

Whistleblower Protection Officer (WPO): The person within the Organisation authorised to receive disclosures and responsible for coordinating the whistleblower process, including protection, investigation oversight, and reporting outcomes.

Case Manager: An individual appointed by the WPO to conduct an impartial investigation into a disclosure. The case manager may engage with the whistleblower, gather evidence, and prepare findings.

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Disclosure: Information provided by an eligible whistleblower regarding suspected or actual misconduct, wrongdoing, or breaches of law, policy, or ethics.

Protected Disclosure: A disclosure that qualifies for legal protection under the Corporations Act 2001(Cth) in Australia or the Protected Disclosures (Protection of Whistleblowers) Act 2022 in New Zealand.

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