

WHISTLE BLOWER POLICY

Version	3.0
Approved by the Board on	28 February 2024
Scheduled review date	Feb 2026

1. INTRODUCTION

MAV is committed to a culture of corporate compliance and high ethical behaviour. This policy deals with certain issues relating to misconduct, malpractice, internal controls, and conflicts of interest to ensure compliance with the laws and regulations applicable to the Company and its employees, and to deal with concerns that are likely to arise in the work environment.

This policy applies to all employees, Board members, and volunteers of the Company.

2. Objectives

The objectives of this policy are to:

- encourage employees to disclose any malpractice, misconduct, or conflicts of interest of which they become aware;
- provide protection for employees who report allegations of such malpractice, misconduct, or conflicts of interest;
- and ensure that all allegations are thoroughly investigated with suitable action taken, where necessary.

3. Policy

This policy is designed to ensure that honesty and integrity is maintained.

A whistleblower is protected against adverse employment actions (dismissal, demotion, suspension, harassment, or other forms of discrimination) for raising allegations of malpractice, misconduct, or conflicts of interest.

Subject to this policy, a whistleblower is protected even if the allegations prove to be incorrect or unsubstantiated. Employees who participate or assist in an investigation will also be protected.

Every effort shall be made to protect the anonymity of the whistleblower or other employees or individuals who participate in an investigation, however there may be situations where anonymity cannot be guaranteed. In such situations;

- The whistleblower shall be fully briefed prior to any further investigations being undertaken that may expose the identity of the whistleblower.
- The investigator will work with the whistleblower to ensure that strategies are put in place to manage possible scenarios that may arise.

- If the identity of the whistleblower is exposed, MAV will undertake to ensure the whistleblower is protected to the full extent possible and in relation to the relevant laws.
- See also Clause 5: Confidentiality.

This policy is not designed to deal with general employment grievances and complaints. All employees should be aware that if an employee makes a false report deliberately, maliciously, or for personal gain, that employee may face disciplinary action.

Below are some examples of reportable malpractice, misconduct or conflicts of interest:

- dishonesty;
- fraud;
- corruption;
- illegal activities (including theft, drug sale/use, violence, threatened violence, or criminal damage against Company assets/property);
- discrimination, vilification, sexual harassment, harassment, bullying and victimisation;
- acts or omissions in breach of Commonwealth or state legislation or local authority bylaws;
- unethical behaviour;
- other serious improper conduct (including gross mismanagement, serious and substantial waste of Company resources, or repeated breaches of administrative procedures);
- unsafe work-practices;
- any other conduct which may cause financial or non-financial loss to the Company or be otherwise detrimental to the interests or reputation of the Company, or any of its employees;
- and the deliberate concealment of information tending to show any of the matters listed above.

4. Protection of whistleblower

This policy protects the whistleblower against any reprisals, provided that the whistleblower identifies himself/herself, and the claim is:

- submitted in good faith and without any malice or intentionally false allegations;
- based on the whistleblower's reasonable belief that the malpractice or misconduct, or issue related to the malpractice or misconduct constitutes, or may constitute, a material violation;
- and does not result in a personal gain or advantage for the whistleblower.

No alleged malpractice or misconduct that meets the above-mentioned conditions will give rise to any reprisals or threat of reprisals against the whistleblower, unless the whistleblower is a participant in the prohibited activities about which the complaint is made. In those circumstances, the decision to file the complaint is only likely to affect the extent of the disciplinary measures (if any) that may eventually be taken against the whistleblower. This effectively means that the Company and its directors, officers, employees and agents will not penalise, dismiss, demote, suspend, threaten or harass a whistleblower, or transfer the whistleblower to an undesirable job or location, or discriminate in any manner against the whistleblower, to take reprisals or retaliate as a result of the whistleblower having reported an act that is illegal or unethical, or deemed illegal or unethical, unless the whistleblower is a participant in the illegal or unethical act(s).

The Company considers any reprisals against a whistleblower to be a serious breach of this policy and one likely to result in disciplinary measures, including dismissal. This protection applies to anyone providing information related to an investigation pursuant to this policy.

5. Confidentiality

The Company recognises that maintaining appropriate confidentiality is crucial in ensuring a potential whistleblower comes forward and discloses their knowledge or suspicions about malpractice or misconduct in an open and timely manner and without fear of reprisals being made against them.

The Company will take all reasonable steps to protect the identity of the whistleblower and will adhere to any statutory requirements in respect of the confidentiality of disclosures made. In appropriate cases, disclosure of the identity of the whistleblower or the allegation made by them may be unavoidable, such as if court proceedings result from a disclosure pursuant to this policy.

6. Reporting procedures

Any person who has reasonable grounds to suspect that malpractice or misconduct has occurred is encouraged to report that suspicion to:

- 1: The CEO. Or if this is considered inappropriate;
- 2: The Finance Committee members, who are Board Members. The Finance Committee Terms of Reference identify a role for this committee in relation to being the contact for whistleblowers when a matter is finance related. Or if this is considered inappropriate or the matter is not finance related, report as follows;
- 3: The President of the Board, or if this is considered inappropriate raise the matter with the Vice President or another Board member.

All claims of malpractice or misconduct should provide specific, adequate and pertinent information with respect to, among other things, dates, places, persons/witnesses, amounts, and other relevant information, in order to allow for a reasonable investigation to be conducted. If the whistleblower discloses his/her name, the person receiving the claim will acknowledge having received the complaint and may initiate a follow-up meeting.

However, if the claim is submitted on an anonymous basis there will be no follow-up meeting regarding the claim of malpractice or misconduct and the Company will be unable to communicate with the whistleblower if more information is required or if the matter is to be referred to external parties for further investigation.

Please remember that all claims of malpractice or misconduct received are treated on a confidential basis and whistleblowers are encouraged to disclose their identity to obtain the protection afforded to them at law.

7. Procedures following disclosure

Once a report of a suspected malpractice or misconduct has been received from a whistleblower who has provided reasonable grounds for their belief that malpractice or misconduct has occurred, an

investigation of those allegations shall commence. All material violations and any actions that may be required as a result of the investigations will be reported to the Management Team.

8. Investigations

Investigations will be conducted promptly and fairly with due regard for the nature of the allegation and the rights of the persons involved in the investigation. Evidence, including any materials, documents or records shall be held securely by the investigator.

The person receiving the disclosure must report it as soon as possible to the CEO. The CEO shall then determine if the allegation is, in fact, pertinent to any of the issues mentioned in this policy.

The CEO will determine the appropriate method for the investigation. In appropriate cases, the CEO may ask for the assistance of an external accounting or legal specialist, as necessary.

Alternatively, if the CEO is implicated in the report, the Board shall be responsible for managing the investigation using the approaches outlined in this policy.

During the investigation, the investigator will have access to all of the relevant materials, documents, and records. The directors, officers, employees and agents of the Company must cooperate fully with the investigator. During the investigation, the investigator will use all reasonable means to protect the confidentiality of the information regarding the whistleblower.

9. Reporting

At the conclusion of the investigation, the investigator will prepare a report of the findings for the Board and/or CEO. Where the final report indicates that the malpractice or misconduct has occurred, the final report will include recommendations for steps to be taken to prevent the malpractice or misconduct from occurring in the future, as well as any action that should be taken to remedy any harm or loss arising from the malpractice or misconduct, including disciplinary proceedings against the person responsible for the conduct, and the referral of the matter to appropriate authorities, as is deemed necessary by the Board and/or CEO.

10. Communications to the whistleblower

The Company shall ensure that, provided the claim was not submitted anonymously, the whistleblower is kept informed of the outcomes of the investigation of the relevant allegations, subject to the considerations of privacy of those against whom allegations are made.

11. Further information and advice

For further information, refer to any other related policies or contact CEO or President for further advice.