



tasmanian
independent
retailers



island fresh
PRODUCE

CG10 Business Conduct Policy

Contents

1. Purpose	2
2. Scope.....	2
2.1. Who is not covered?	2
2.2. Doing the right thing	2
2.3. What is reportable conduct?	3
2.4. Personal work-related grievances	3
3. How do I make a Business Conduct report?	3
3.1. What should I include in the report?	3
3.2. Should I make a Business Conduct Report anonymously?	4
3.3. Identity protection	4
4. What protection will I have as a Business Conduct?	4
4.1. The Business Conduct Protection Officer	4
4.2. Detrimental conduct is not tolerated	4
4.3. False or misleading disclosures.....	5
5. How will my matter be investigated?	5
5.1. Who will assess or investigate my matter?	5
5.2. How will my Business Conduct Report be reviewed by TIR?.....	5
5.3. What is the investigation process?	5
5.4. Fair treatment of the individuals mentioned in the Business Conduct Report.....	5
5.5. What happens after an investigation?	5
6. What support do I have?	5
6.1. Raising concerns about actions taken by TIR.....	6
7. Definitions	6
Changes, Linked Documents, Authorisation, Effective & Evaluation Dates	7
Evaluation History	7

1. Purpose

At Tasmanian Independent Retailers Group (TIR), we are committed to the highest levels of ethics and integrity in the way we do business. We understand that this is crucial to maintain the trust of our stakeholders and protect our reputation as an ethical business.

Our values, Code of Conduct, and policies guide our everyday conduct. We all have a professional responsibility to speak up and report unethical behaviour.

This policy describes the protections available to whistleblowers, what matters are reportable, how you can report your concerns without fear of detriment, and how TIR will support and protect you.

2. Scope

The development of this policy has considered the relevant legal requirements and good practice relating to the protection of whistleblowers in the Corporation Act 2001 (Cth), The Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 (Cth) and Public Interest Disclosure Act 2002 (TAS).

The policy applies to anyone making a Business Conduct disclosure in relation to TIR. This includes suspected or actual unethical, illegal, corrupt, fraudulent, or undesirable conduct or any breach of TIRs Code of Conduct. The policy applies to protected disclosures made in Australia by:

- an employee, former employee, or contractor of TIR;
- an individual who supplies goods or services to TIR;
- an employee of a person or entity who supplies goods or services to TIR (whether paid or unpaid);
- an individual who is an associate of TIR (meaning a director of TIR, a member of its co-operative, or a person acting in concert with TIR); and
- a relative or dependant of any of the persons listed above.

2.1. Who is not covered?

This policy does not apply to third parties (other than eligible whistleblowers) including Customers of TIR or IGA. Customer complaints are managed through the Complaints Policy.

2.2. Doing the right thing

It is important that all employees understand the ethical behaviour expectations of TIR as well as their obligations. At TIR, doing the right thing is central to the way we do business. It is the foundation of our values of, 'We are Open and Honest, 'We Care and Listen'.

We therefore expect everyone who works for TIR, including Co-operative Members and IGA Retailers to comply with our Code of Conduct, our policies and procedures, professional standards, laws and regulations. You also have a responsibility to speak up using the channels available when you suspect something does not look or feel right.

We encourage you to consider talking to your trusted manager, supervisor, team lead or if external to TIR, your TIR contact. We would rather hear your concerns directly so that we can resolve them directly.

If you make a Business Conduct Report pursuant to this policy, we have a responsibility to protect you, including not disclosing your identity (unless required or permitted by law) and making sure you are not subject to detrimental conduct.

2.3. What is reportable conduct?

Reportable conduct is any past, present, or likely future activity, behaviours or situation that you have reasonable grounds to suspect, in relation to TIR, this could include, but not limited to:

- illegal conduct, such as theft, violence or threatened violence, and criminal damage against property;
- fraud, money laundering or misappropriation of funds;
- offering or accepting a bribe;
- financial irregularities;
- endangering health and safety;
- failure to comply with, or breach of, legal or regulatory requirements internal policy or Code of Conduct; and
- engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made or be planning to make a disclosure.

While everyone is encouraged to speak up and report any concerns, reportable conduct excludes personal work-related grievances as described below.

2.4. Personal work-related grievances

A personal work-related grievance is a report of behaviour that has implications for the discloser personally. Examples include:

- an interpersonal conflict between you and another employee, or
- a decision relating to your employment or engagement, such as a transfer, promotion, or disciplinary action.

Personal work-related grievances do not qualify for protection under the whistleblower Laws or this policy. Personal work-related grievances must be raised with your manager, supervisor or team lead.

3. How do I make a Business Conduct report?

To make a Business Conduct report, you need to make a direct report to an eligible recipient called Business Conduct Report Officer (BCRO). At TIR we have identified the following roles as BCROs:

- Chief Executive Officer
- Head of People and Culture
- Chair of the Board.

Alternatively, you can make a disclosure report using our dedicated internal email account SpeakUp@igatas.com.au. This email account is monitored by the Head of People and Culture or by post to:

Chief Executive Officer
Tasmanian Independent Retailers
8 Translink Avenue
Western Junction
Tas 7212

3.1. What should I include in the report?

A report must contain enough information to form a reasonable basis for an investigation. Some useful details include:

- date, time and location;
- names of person(s) involved, roles and their business;
- your relationship with the person(s) involved;
- the general nature of your concern;

- how you became aware of the issue;
- possible witnesses; and
- other information that you have to support your report.

3.2. Should I make a Business Conduct Report anonymously?

You can choose to make your disclosure anonymously and if so, you will still be protected under the Whistleblower Laws. However, requiring complete anonymity may practically make it more difficult for us to assess and investigate the issue or take the action we would like to take. By letting us know who you are, we can contact you directly to discuss your concerns which will help us investigate the complaint more quickly and efficiently. We can also appoint a Business Conduct Protection Officer (BCPO) to you to assist with any questions or concerns that you have about the process.

3.3. Identity protection

Both Commonwealth and Tasmanian Law prohibits disclosure of the identity of a whistleblower, or information likely to lead to the identification of a whistleblower without your consent (this is subject to limited exceptions, including disclosure to a legal practitioner for the purpose of obtaining legal advice in relation to the disclosure).

4. What protection will I have as a Whistleblower?

Both Commonwealth and Tasmanian Law provide protections and support for whistleblower. A whistleblower must make a Business Conduct Report directly to an eligible recipient (See Section 3) to qualify for protections under the Whistleblower Laws and this Policy. These protections include:

- Identity protection (refer section 3.3)
- Protection from detriment
- Compensation and remedies; and
- Civil, criminal and administrative liability protection.

We are committed to taking all reasonable steps to protect you from detriment as a result of making a report under this Policy and the Whistleblower Laws.

4.1. The Business Conduct Protection Officer

Where you have disclosed your identity to us, we may appoint a Business Conduct Protection Officer (BCPO). The BCPO will take steps to protect the interests of individuals making reports under this policy.

The BCPO would usually act as the contact point for communication with the whistleblower. A BCPO may be assigned to current Head of Department or senior employee at TIR.

4.2. Detrimental conduct is not tolerated

TIR does not tolerate any form of detrimental conduct taken by any person against the whistleblower or any people who are involved in an investigation of a Business Conduct Report.

Examples of detrimental conduct can include, but are not limited to:

- discrimination, disadvantage or adverse treatment in relation to a persons' employment, career, profession, trade or business, including the taking of disciplinary action;
- action causing injury, loss or damage;
- harassment, intimidation, or bullying; and
- threats to cause detriment.

Examples of actions that are not detrimental conduct may, for example, include:

- managing a whistleblower's unsatisfactory work performance, if the action is in line with TIR's performance management framework

- administrative action that is reasonable to protect the whistleblower from detriment.

TIR takes all allegations of detrimental conduct very seriously. If you believe that you are suffering detriment you should report it to us, and we will take appropriate steps in accordance with this and the TIR's other policies. If you as the whistleblower have experienced detriment, please contact a BCRO, SpeakUp@igatas.com.au or, if applicable, your appointed BCPO.

4.3. False or misleading disclosures

When making a disclosure, you will be expected to have reasonable grounds to suspect the information you are disclosing is true, but you will not be subject to a penalty if the information turns out to be incorrect. However, you must not make a report that you know is not true or is misleading. This may be a breach of our Code of Conduct and will be considered a serious matter that may result in disciplinary action.

5. How will my matter be investigated?

5.1. Who will assess or investigate my matter?

All Business Conduct Reports will be considered by the TIR Risk and Audit Committee, who may appoint an internal or external Business Conduct Investigation Officer (BCIO) to investigate the Business Conduct Report.

5.2. How will my Business Conduct Report be reviewed by TIR?

All Business Conduct Reports will be taken seriously by TIR. They will all be assessed carefully to determine whether an investigation is required. The outcomes of the investigation are reported to the Risk and Audit Committee. The Risk and Audit Committee will review the outcome and determine appropriate actions to respond to the matter.

5.3. What is the investigation process?

While the circumstances of each Business Conduct Report may require different investigation steps, all investigations will:

- follow a fair process;
- be conducted as quickly and efficiently as the circumstances permit;
- determine whether there is enough evidence to substantiate the matters reported; and
- be independent of the person(s) concerned with the allegations.

We will provide you with feedback, as appropriate on the progress and expected timeframes of the investigation.

5.4. Fair treatment of the individuals mentioned in the Business Conduct Report

The investigation process outlined in this Policy is also designed to allow fair treatment of any individuals mentioned in the disclosure, including:

- Disclosures will be handled confidentially
- Matters reported will be assessed and may be subject to an investigation
- There will be a presumption of innocence until the outcome of the investigation is determined; and
- The purpose of the investigation is to determine whether there is enough evidence to substantiate the matters reported.

5.5. What happens after an investigation?

TIR will notify you once an investigation has been completed but please be aware that TIR may be unable to disclose details or the outcome of the investigation.

6. What support do I have?

TIR will support you where you have concerns about detrimental conduct or the investigation process.

An Employee Assistance Program (EAP) is available to TIR employees, co-operative members (and their immediate family members). The EAP is confidential, and the provider is newportwildman.com or 1800 650 204. Although TIR will endeavour to support all whistleblowers, we will not be able to provide the same practical support to suppliers and contractors that it provides to current Employees.

6.1. Raising concerns about actions taken by TIR

If a BCPO has been appointed, you should immediately inform the BCPO if you are concerned that:

- you may be, are being, or have been subjected to detrimental conduct
- there has been a disclosure of your identity contrary to this Policy; or
- your disclosure has not been dealt with in line with this Policy.

The BCPO will report your concerns to the Risk and Audit Committee for consideration. Alternatively, you can raise your concerns in TIR Speak Up SpeakUp@igatas.com.au, with a BCRO or with a Regulator (ASIC, APRA, ATO, WorkSafe Tasmania).

7. Definitions

Board	The TIR Board
Business Conduct Policy Owner	The Head of People and Culture is the owner of the Policy. The Board will provide oversight.
Business Conduct Investigation Officer or BCIO	The BCIO is a person who has been nominated to carry out an investigation of a Business Conduct Report.
Business Conduct Protection Officer or BCPO	The BCPO is a person who has been nominated to provide support and assistance to the Business Conduct as needed. BCPO's are available to TIR team members.
Business Conduct report	A reportable conduct disclosure made by a Business Conduct that is being treated in accordance with this policy.
Business Conduct Report Officer or BCRO	A BCRO is a person who has been nominated to receive disclosures of reportable conduct from a Business Conduct. The following are BCRO's of TIR: <ul style="list-style-type: none"> ▪ TIR Speak Up (email account managed by People and Culture) ▪ The CEO ▪ Head of People and Culture ▪ Chair of the Board.
Regulator	A Commonwealth authority prescribed in the Business Conduct Laws, such as APRA, ATO, WorkSafe Tasmania.
TIR Risk and Audit Committee	The TIR Risk and Audit Committee (including its members individually) are responsible for, reviewing Business Conduct Reports, championing the Business Conduct Policy and overseeing its implementation and effectiveness.
Whistleblower	An Eligible whistleblower who makes a disclosure of reportable conduct in the manner described in this policy.

• **POLICY DEVELOPMENT USE ONLY**

Changes, Linked Documents, Authorisation, Effective & Evaluation Dates	
Linked Documents	CG02 TIR Code of Conduct v3 CG09 Modern Slavery Policy Managing Business Conduct Disclosures Grievance Procedures (TBD) Customer Complaints Policy (TBD)
Legal & Other Referenced Documents	Public Interest Disclosure Act 2002 Corporations Act 2001 The Treasury Laws Amendment (Enhancing Business Conduct Protections) Act 2019 (Cth)
Policy Changes	This policy may be rescinded, changed or replaced at any time at the absolute discretion of the TIR Board, CEO or authorised delegate.
Authorisations	Chief Executive Officer Risk & Audit Committee TIR Board of Directors Head of People & Culture
Prior Relevant Documents	This policy supersedes any prior Business Conduct policy, verbal or written.
Effective Date	V1: August 2022
Current Version	V1: August 2022
Next Review Date	August 2025

Evaluation History			
Date	Author	Sections Modified	Details of Amendments
Creation date	Name M. Axford	ALL	Document creation, parameters set 12 July 2022
Date	CEO Grant Hinchcliffe	All	Review/ Approval 08 August 2022
Date	Risk and Audit Committee	All	Risk & Audit Committee Approval 11 August 2022
Date	TIR Board	ALL	Board Approval as of 30 August 2022