



WHISTLE-BLOWER POLICY

1. PURPOSE

BMS Retail Group Pty Ltd (trading as Champions IGA) is committed to the highest standards of conduct and ethical behaviour in all of our business activities. We are committed to promoting and supporting a culture of honest and ethical behaviour in line with our policies and in compliance with all laws.

2. WHO IS A WHISTLE-BLOWER

A whistle-blower is defined as anyone who makes or attempts to make a report of reportable conduct under our policy.

In addition to the protections under the policy, certain legislation may offer statutory protection of whistle-blowers. Champions IGA will comply with all applicable legislative requirements.

3. WHAT IS REPORTABLE CONDUCT?

Reportable conduct is defined as any past, present or likely future activity, behaviour or state of affairs considered to be:

- Dishonest;
- Corrupt (including soliciting, accepting or offering a bribe or other benefits);
- Fraudulent;
- Illegal (including theft, drug sale or use, violence or threatened violence and property damage);
- A breach of any law, regulation or Company policy;
- Impeding internal or external audit processes;
- Endangering health or safety;
- A serious mismanagement of Champions IGA resources;
- Detrimental to Champions IGA financial position or reputation;
- Actions involving harassment, discrimination, victimisation or bullying;
- Concealing reportable conduct.

4. WHISTLE-BLOWER REPORTS

All reports must be made with a genuine and reasonable belief regarding the reportable conduct. Whistle-blowers are requested to provide as much information as possible and any known details about the events underlying the report (e.g. date, time, location, name of person(s) involved, possible witnesses to the events, evidence of the events (e.g. documents, emails) and steps they may have already taken to report the matter elsewhere or to try resolve the concern).

Our policy does not in any way restrict or diminish the right of any individual to make disclosures directly to relevant regulators.

5. HOW TO REPORT

Champions IGA have several channels for making a report if a person becomes aware of any issue or behaviour which he or she considers to be Reportable Conduct.

a. Directly to Champions Management

Whistle-blowers can report matters internally via email, phone or directly to any of the following Champions IGA personnel:

- An immediate supervisor, manager or another senior manager within their Store.
- The Operations Manager, Human Resources Department or Chief Executive Officer located at BMS Retail Group Head Office.

b. External Reporting

If the whistle-blower doesn't feel comfortable in reporting the matter internally, they may choose to report the matter anonymously via the external whistle-blower hotline facility managed by STOPline; an Australian based, confidential, independent provider of disclosure services. Matters can be reported using any of six different methods at a time convenient for the whistle-blower:

- Telephone 1300 30 45 50 (in Australia)
- Facsimile Champions IGA C/o The STOPline 63 3 9882 4480
- Email championsiga@stopline.com.au
- On-line championsiga.stoplinereport.com
- Mail Champions IGA C/o STOPline, Locked Bag 8, Hawthorn, VIC 3122
- App Smart phone APP (free download from the Apple iTunes store & Google Play)

6. INVESTIGATIONS

When a whistle-blower reports a matter either internally or via the external whistle-blower hotline facility, it will be subject to a thorough investigation with the objective of locating evidence that either substantiates or refutes the allegation. All reports will be assigned to a suitable Whistle-blower Investigation Officer who will be a staff member of Human Resources or Senior Management, who is not implicated in the report. All information received by Champions IGA via a whistle-blower will be collected, considered and handled in a way that has regard to the law, privacy, confidentiality, fairness and legal privilege.

The rules of natural justice will be observed in that the investigation will be conducted without bias and any person against whom an allegation is made will be given the opportunity to respond.

Champions IGA, when undertaking any related investigation, may engage external professionals to assist in any part of the investigation process.

No staff member or director of Champions IGA can be involved in receiving whistle-blower related communication or the conduct of investigations involving themselves.

6.1 Anonymity of the Whistle-blower

Whistle-blowers who are concerned about their anonymity are encouraged to only report matters via STOPline. Due to the independent nature of the STOPline disclosure service, there is a greater level of control, and therefore assurance afforded to maintain the whistle-blowers anonymity; compared to reporting matters internally.

If additional information is required from the Whistle-blower to investigate a reportable matter more fully, this will also be managed by STOPline to ensure anonymity is maintained.

Any commitment of confidentiality is subject to the requirements of the law, which may require disclosure of the identity of the whistle-blower in legal proceedings. Information obtained from a whistle-blower will only

be disclosed to the extent necessary to investigate the matter, or if the whistle-blower consents to the disclosure, or as may be required by law.

Unauthorised disclosure of information other than in accordance with this Policy by Champions IGA staff may be the subject of disciplinary proceedings, including termination of employment.

6.2 Protection of the Whistle-blower

Whistle-blowers who report matters in good faith, and provided he or she has not been involved in the conduct reported, will not be penalised or personally disadvantaged because they have reported a matter, by any of the following:

- Dismissal
- Demotion
- Any form of Harassment
- Discrimination
- Bias

A whistle-blower who believes he or she, or his or her family, has been the victim of any of the above due to their status as a whistle-blower, should immediately report the same to the Chief Executive Officer.

Any staff member or director who is found to have dismissed, demoted, harassed or discriminated against a whistle-blower because of their status as a whistle-blower, may be subjected to disciplinary measures, including termination of employment.

Whistle-blowers who are involved in improper conduct themselves are not protected from the consequences of such behaviour. A person's liability for their own conduct is not affected by the same person's disclosure of that conduct.

6.3 Support

All staff involved in a reportable matter are encouraged to access the Employee Assistance Program (EAP) for support when needed. Information and full contact details regarding the EAP are located on Champions IGA notice boards and OH&S Inductions. Telephone contact 1800 818728

7. DUTIES OF EMPLOYEES IN RELATION TO REPORTABLE CONDUCT

It is expected that employees of Champions IGA who become aware of known, suspected, or potential cases of Reportable Conduct will make a report under this policy or under other applicable policies.

8. OTHER COMPANY POLICIES

This policy operates in conjunction with all other Company policies and procedures, including but not limited to the following:

- Bullying and Sexual Harassment Policy
- Social Media Policy
- Occupational Health and Safety Policy / Manual
- Alcohol / Drugs Policy

Information received through the whistle-blower procedure will be investigated through the applicable Company policy / procedure.