



## Protected Disclosures (Whistleblowing) Policy

### 1. Purpose

The purpose of this Policy is to set out the processes by which suspected serious wrongdoing can be reported, within the framework of protection provided by the Protected Disclosures Act 2000 (**the Act**).

Reporting serious wrongdoing assists with managing risk, promotes openness and transparency and protects Geo's reputation.

### 2. Serious wrongdoing

Serious wrongdoing includes any act, omission, or course of conduct that constitutes:

- a serious risk to public health or public safety or the environment;
- a serious risk to the maintenance of law, including the prevention, investigation, and detection of offences and the right to a fair trial (e.g. bribery, fraud, false accounting); or
- a criminal offence (e.g. insider trading, theft, receiving stolen property).

### 3. Reporting Process

Any employee or contractor of or to Geo and any of its subsidiaries, who becomes aware of or suspects any serious wrongdoing at Geo (the **Notifier**) is encouraged to report it.

In order to claim the protections described in section 5 below, information about serious wrongdoing should be reported to the Chief Executive, or if the suspected wrong-doing is in relation to the Chief Executive, or the Chief Executive does not respond in an appropriate time and manner, the Chairman of the Board.

### 4. Investigation Process

Once suspected serious wrongdoing has been reported, the person receiving the report will consider the information made available and decide on the type of investigation to be undertaken.

Any investigation carried out must reflect the principles of natural justice, which include:

- remaining unbiased and impartial;
- making a decision only once all parties involved (or alleged to be involved) in the serious wrongdoing have been given the opportunity to be heard;
- giving all parties involved (or alleged to be involved) in the serious wrongdoing reasonable notice of any interview;
- advising all parties involved (or alleged to be involved) in the serious wrongdoing that they may be represented at any interview; and
- giving all parties involved (or alleged to be involved) in the serious wrongdoing a reasonable opportunity and period of time to respond to the allegation.

The details of any protected disclosure may be reported to the Board as appropriate.

## **5. Protections available under the Act**

The protections available under the Act are that:

- no civil, criminal, or disciplinary proceedings can be taken against a person for making a protected disclosure; and
- an employee who suffers retaliatory action by their employer for making a protected disclosure can take personal grievance proceedings.

Protection under the Act may be claimed by the Notifier if the report relates to serious wrongdoing in or by Geo, and the Notifier:

- reports the concern to the Chief Executive or Chairman of the Board;
- believes that the information is true or likely to be true;
- wants that information investigated; and
- indicates that disclosure of that information is to be protected under the Act.

In order to receive the protections provided under the Act, the Notifier is required to make disclosures using the channels described above rather than in the public domain. Protection is lost if the concern is disclosed publicly or through the media.

## **6. Confidentiality**

The identity of the Notifier will be kept confidential unless:

- that person consents to their identity being disclosed; or
- the person to whom the protected disclosure is reported or referred reasonably believes that disclosure of identifying information is essential:
  - to the effective investigation of the allegations; or
  - to prevent serious risk to public health or safety or the environment; or
  - having regard to the principles of natural justice.

## **7. Requirement to act in good faith**

The protections offered by the Act and this Policy do not apply where the Notifier makes a disclosure they know to be false or otherwise acts in bad faith. Allegations made maliciously or in bad faith may result in disciplinary action.

## **8. Related Policies**

Employees must ensure they are familiar with all of our policies. This Policy should be read alongside the Code of Ethics and other policies that guide business conduct.