

Whistleblower Policy

1. Overview

Purpose

The purpose of this policy is to ensure all volunteers and partners are free to:

- speak up about matters of suspected misconduct which may be considered unethical, illegal or immoral
- report on actual misconduct without fear of detriment, where concerns are supported by reasonable grounds, without fear of intimidation, disadvantage or reprisal

Who does this policy apply to?

This policy applies to:

- Fullife Foundation Directors
- employees and volunteers of Fullife Foundation or Fullife Pharmacy
- any person or organisation who partners with Fullife Foundation in any capacity
- any person travelling with Fullife Foundation to our partner programs in Ethiopia

Policy Changes

The Fullife Foundation Board will review this Policy every 2 years.

Version Control Table

Version	Date	Changes	Created by	Authorised by
0.1	05.08.23	Initial draft	Janelle Murley	
0.2	20.03.24	Second draft following Board member review	Janelle Murley	
0.3	04.11.24	Third draft following legal review	Janelle Murley	
1.0	14.03.25	Finalise section 4.2 and update to new version and branding following board discussion and approval	Janelle Murley	Fullife Foundation Board

2. Regulatory Obligations

Under the ACNC Governance Standards Fullife Foundation has an obligation to comply with its regulatory obligations.

This policy provides a process for people to report any detected wrongdoing in relation to those obligations without fear of reprisal.

3. Policy Statement

Fullife Foundation is committed to taking all reasonable efforts to encourage the reporting of detected wrongdoing through:

- 3.1. identifying and deterring instances of misconduct
- 3.2. providing guidance on how to report suspected or actual unethical or unlawful behaviour
- 3.3. ensuring disclosures, and individuals who disclose, are dealt with appropriately and fairly

4. Policy Implementation

Fullife Foundation implements this policy statement in the following ways:

<p>4.1. Policy awareness</p>	<p>4.1.1. Fullife Foundation will make this policy available on the Fullife Foundation website</p> <p>4.1.2. All members of the Fullife Foundation staff and volunteers must familiarise themselves with this policy and any associated procedures and comply with all requirements</p>
<p>4.2. Reporting disclosures</p>	<p>4.2.1. Any person including directors, employees, volunteers and partners may report a disclosure as per the Incident Response Procedure, which can be found on our website at Fullifefoundation.com.au</p> <p>4.2.2. There must be reasonable grounds to suspect wrongdoing</p> <p>4.2.3. See section 6 'Definitions' for further information about what constitutes reportable conduct</p> <p>4.2.4. False reporting is a serious matter and will be addressed appropriately</p> <p>4.2.5. The person reporting may report anonymously but must also recognise that this may make it more difficult to investigate the matter</p>
<p>4.3. Responding to disclosures</p>	<p>4.3.1. The investigating person/Director will respond to the disclosure as per the Incident Response Procedure</p>
<p>4.4. Protection for disclosing party</p>	<p>4.4.1. Fullife Foundation is committed to ensuring people feel safe in reporting a disclosure</p> <p>4.4.2. The identity of the reporting person will remain confidential and they will be protected from detrimental conduct for making the report</p> <p>4.4.3. Detrimental conduct against a person reporting a disclosure will be treated as a serious wrongdoing, even if the disclosure is not substantiated</p> <p>4.4.4. Anyone experiencing detrimental conduct for making a disclosure should report that conduct to the Head of the Governance & Risk Advisory in the first instance at janellem@fullife.com.au</p> <p>4.4.5. This protection will also extend to those named in the disclosure where appropriate</p>

5. Definitions

<p>Reportable conduct</p>	<p>Reportable Conduct includes any past, present or likely future conduct which:</p> <ul style="list-style-type: none"> • Is dishonest, corrupt or unethical • Involves theft, fraud, money laundering or misappropriation of funds • Is a systemic, willful or serious breach of the law or Fullife Foundation's regulatory obligations or its internal policies or processes • Involves offering or accepting a bribe from any person • Is illegal • Presents a significant or serious threat to the health and safety of workers or volunteers • Involves a serious mismanagement of Fullife Foundation's resources • Involves victimisation of someone for reporting a Reportable Conduct
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	<ul style="list-style-type: none"> • Involves any instruction to cover up or attempt to cover up serious wrongdoing • Interferes with any audit processes • Presents a serious risk to the reputation or financial wellbeing of Fullife Foundation <p>What is Not Reportable Conduct: This Policy is not intended to apply to conduct concerning personal or employment-related disputes.</p>
Ethical	Refers to rules regarding right and wrong that are agreed upon by a community or provided by an external source, e.g., codes of conduct in workplaces or principles in religions. (Diffen.com)
Moral	Concerned with an individuals personal principles of right and wrong behaviour (dictionary.com)
Legal	Relating to or permitted by the law (dictionary.com)
Detrimental Conduct	<p>Detrimental conduct may include, but is not limited to:</p> <ul style="list-style-type: none"> a) dismissal of an employee; b) injury of an employee in his or her employment; c) alteration of an employee's position or duties to his or her disadvantage; d) discrimination between an employee and other employees of Fullife Foundation; e) harassment or intimidation; f) physical or psychological harm; g) damage to a person's property; h) damage to a person's reputation; i) damage to a person's business or financial position; j) repeated failure to select an individual; k) a reduction in future contract value; l) removal of coaching and other financial and non-financial support; and m) any other damage to a person