



ROYAL NSW CANINE COUNCIL LTD (trading as DOGS NSW)

WHISTLEBLOWER PROTECTION POLICY

1 Purpose

This Whistleblower Protection Policy has been put in place to ensure any concerns raised regarding any misconduct or improper state of affairs or circumstances in relation to DOGS NSW are dealt with effectively, securely, appropriately, and in accordance with the *Corporations Act 2001* (Cth).

DOGS NSW encourages the reporting of any instances of suspected unethical, illegal, corrupt, fraudulent or undesirable conduct and provides protections and measures to individuals who make a disclosure in relation to such conduct without fear of victimisation or reprisal.

2 Scope

This policy applies to any person who is, or has been, any of the following with respect to DOGS NSW:-

- An Employee;
- Board Member;
- Volunteer;
- Contractor;
- Supplier;
- Consultant;
- Auditor;
- Relative, dependant, spouse or dependant of a spouse of any of the above.

3 Policy

DOGS NSW is committed to:-

- 1) providing an ethical culture and work environment for its employees;
- 2) encouraging the confidential and timely disclosure of information about fraudulent, illegal, corrupt or otherwise suspected Reportable Conduct in connection with the activities of DOGS NSW;
- 3) supporting and protecting the interests, welfare and as far as possible, the identity of individuals who come forward with such information in good faith for the benefit of the DOGS NSW;
- 4) providing a confidential and secure method for employees to pass on information about Reportable Conduct; and
- 5) eliminating instances of fraudulent or corrupt business practices thereby safeguarding and protecting DOGS NSW business reputation with its stakeholders, members and the community at large.

“Reportable Conduct” includes any conduct connected to DOGS NSW which is:-

- Dishonest
- Fraudulent
- Corrupt
- Illegal (such as theft, dealing in or use of illicit drugs, violence or threatened violence and criminal damage to property)
- In breach of Commonwealth or State laws



- Unethical including any breach of DOGS NSW policies such as the Code of Conduct
- Oppressive or grossly negligent
- Harassment, discrimination, victimisation or bullying
- Unsafe work practices
- Any other conduct which may cause financial or non-financial loss (including reputational damage) to or be otherwise detrimental to the interests of DOGS NSW.

This list of reportable conduct is not exhaustive and should be used as a guide to determine what sort of matters should be reported. A Whistleblower must, however, have objectively reasonable grounds to suspect misconduct or a contravention or an improper state of affairs or circumstances.

For the avoidance of doubt, reportable conduct does not include personal work-related grievances.

“Whistleblower” means anyone listed in Section 2 (Scope) of this policy who make a report of Reportable Conduct.

DOGS NSW will keep all information provided under the terms of this policy confidential and secure within the terms of the law. If you report on an anonymous basis, you will still qualify for the protections in this policy.

DOGS NSW will do everything within its power to protect the interests of a Whistleblower who provides DOGS NSW with information about Reportable Conduct from:-

- Dismissal
- Anonymity breaches
- Demotion or disciplinary action
- Any form of harassment (including victimisation or threats of victimisation)
- Discrimination
- Current or future bias
- Harm or injury including psychological harm
- Damage to a person’s property, reputation, or business or financial position
- Legal action

If, however, an employee provides information knowing it is fictitious or malicious, that person will be subjected to disciplinary action which may include summary dismissal.

If a Whistleblower believes they have been subject to any of the above actions, they may seek assistance directly from any of the Contacts listed below.

4 PROCEDURE

If you believe there is an occurrence of Reportable Conduct in connection with DOGS NSW, the following procedure should be adopted:-

- 1) Ideally, any information regarding Reportable Conduct should be raised with one of the Contacts detailed at the end of this policy. This should be in writing setting out as much detail as possible about the alleged incident/s. In some cases, it will not be appropriate to raise this information with one of the Contacts. You should, therefore, provide the information to another nominated Contact.
- 2) You should tell the person you provide the information to whether you wish the report to be anonymous. The information you provide will be kept confidential; however, it may be used in further investigations of the matters raised.

- 3) You may choose to provide information anonymously, however, by doing so, you limit the use to which DOGS NSW can use the information.
- 4) Depending on the type of information provided, you may be entitled to additional assistance from DOGS NSW such as a period of absence during investigations. The entitlement and level of assistance provided will be determined on a case-by-case basis and will be at the sole discretion of DOGS NSW.
- 5) All information provided will be investigated. The depth of such investigation will depend on a number of matters. In all cases, however, employees will be treated with fairness and will be given an opportunity to respond to any allegations of misconduct.
- 6) Whenever possible, DOGS NSW will act on information provided about Reportable Conduct, take the necessary steps to eliminate the activity and deal with any perpetrators. If sufficient evidence is found to indicate the commission of criminal acts, this information, together with the results of a DOGS NSW investigation and other relevant material will be provided to law enforcement agencies or other proper authority. This is in addition to any disciplinary or recovery action DOGS NSW may take against its employees where sufficient evidence exists to point towards the commission of criminal offences.

5 BREACH OF THIS POLICY

Any breach of this policy will be taken seriously and may result in disciplinary action, up to and including termination of employment.

6 CONTACTS

1.	President	Lyn Brand Email: lbrand@dogsnsw.org.au
2.	Human Resources	HumanKapital Email: admin@humankapital.com.au
3.	Company Secretary	Virginia Gagan-Wilson Email: vgagan-wilson@dogsnsw.org.au

7 DOCUMENT AMENDMENT HISTORY

Revision	Date	Description	Prepared By	Reviewed By	Approved By
1	Sep 2025	Development of policy	HK	Company Secretary	Board of Directors