



Whistleblower Policy

Purpose and scope

At Blundstone, we are committed to doing the right thing, behaving ethically, acting lawfully and with integrity and to minimise our impact on the environment.

Employees and contractors are encouraged to speak up if they observe or suspect unethical, illegal, fraudulent or undesirable conduct involving Blundstone.

We will support those who raise their concerns and provide protections and other measures so that anyone who makes a report can do so confidentially and without fear of intimidation, disadvantage or reprisal.

This Policy provides clarity on how Whistleblowers are encouraged to raise their concerns, including:

- knowing how to make a report;
- knowing what will happen when they do so; and
- feeling safe in expressing their concerns.

This Policy will apply globally. However, if any local laws are inconsistent with this Policy or impose a higher level of protection than this Policy, those local laws will take precedence in that jurisdiction to the extent of that inconsistency.

Definitions

Chief Executive Officer (CEO)

Means both Joint CEOs acting jointly, or where one of the Joint CEOs is unable to act (for example, because of a conflict of interest), the other Joint CEO acting alone.

Detrimental Conduct

Means conduct which is aimed at a Whistleblower including but is not limited to:

- termination of employment;
- harassment, bullying or intimidation;
- personal or financial disadvantage;
- unlawful discrimination;
- harm or injury, including psychological harm, damage to reputation or property; or
- any other conduct that constitutes retaliation.

Eligible Recipient

A person who is able to receive a Whistleblower's report or disclosure. Eligible Recipients include Whistleblower Officers. See the section titled "Making a report" below.

Investigator

Means the person responsible for the investigation of a disclosure made under this Policy. This may be a Blundstone employee or an independent external investigator, depending on the nature of the allegations made and the person or persons against whom they are made.

Date Approved: 10 March 2023

Date of Review: 1 February 2025



Reportable Conduct

Means any conduct that is dishonest, fraudulent, corrupt, illegal, unethical, in breach of internal policies, misconduct, an improper state of affairs or represents a danger to the public. The conduct must be that of a Blundstone director, officer, employee, contractor, supplier, tenderer or other person who has business dealings with Blundstone.

Reportable conduct does not include personal work grievances which relate to someone's current or former employment or engagement and have implications for that person, but do not have broader implications for Blundstone or the wider public. For example, a disciplinary decision which does not involve a breach of workplace laws will not be Reportable Conduct.

Personal work grievances will be dealt with under Blundstone's policies relating to employment, as applicable.

Welfare Officer

Means the person assigned to an identified Whistleblower who provides personal support to and safeguards the welfare of the Whistleblower. The Welfare Officer at Blundstone is Group Manager People and Culture.

If the Welfare Officer has a conflict of interest, the CEO will appoint an alternative Welfare Officer at their discretion.

Whistleblower

Can be an employee (current or former), contractor, supplier, distributor, auditor, director of Blundstone (or a relative or dependent or spouse of any of those individuals) who reports or discloses Reportable Conduct.

Whistleblower Officer

Means the individuals specified in the section titled "Making a report" below.

Whistleblowing

Means when a Whistleblower reports or discloses Reportable Conduct.

Protecting and supporting Whistleblowers

We are committed to ensuring that Whistleblowers are supported and protected from all forms of Detrimental Conduct and will take appropriate action where Detrimental Conduct is identified.

All information provided by the Whistleblower, and generally information provided in relation to the investigation, will be treated confidentially and sensitively, including the identity of the Whistleblower. The Whistleblower's identity will only be shared if the Whistleblower consents or it is required by law. In addition, the Investigator will take all reasonable steps to de-identify information that forms part of the investigation to protect the identity of the Whistleblower.

The Welfare Officer will support the Whistleblower throughout the investigation process ensuring that they have access to Blundstone's free and confidential counselling services provided through its employee assistance program and regular updates on the status of the investigation.

To qualify for protection as a Whistleblower the disclosure must be made by a Whistleblower and involve Reportable Conduct.

Certain extra protections for Whistleblowers under the *Corporations Act 2001* (Cth) or the *Taxation Administration Act 1953* (Cth) may apply. Eligible Whistleblowers are protected by law from prosecution against certain actions that may arise from the disclosure, however this immunity will not extend to any misconduct the Whistleblower was involved in which is identified as part of an investigation.

Making a report

If you become aware of any conduct which you consider to be Reportable Conduct, you can express your concerns by:

- Discussing your concerns with your immediate supervisor or line manager where it is appropriate to do so. Every senior manager at Blundstone is an Eligible Recipient.



- If you are not a Blundstone employee, or if you are an employee but do not think it is appropriate to raise your concerns with your manager, or you have done so and no action has been taken, then you can contact a Whistleblower Officer (listed below) to lodge a formal disclosure or report.

Name	Position	Phone	Email
Darryl Wilkes	Joint CEO	+61 419 382 691	dwilkes@blundstone.com
Adam Blake	Joint CEO	+61 400 994 409	ablake@blundstone.com
Matthew Pigden	Chief Financial Officer & Company Secretary	+61 408 533 583	mpigden@blundstone.com
Steve Gunn	Director & Chairman	+61 419 554 503	chair@blundstone.com
Damian Bugg	Director	+61 418 123 412	dbugg@blundstone.com
Ailsa Sypkes	Group Manager Legal & Compliance	+61 456 213 501	asypk@blundstone.com

You can also:

- Email your concerns to Whistleblower@blundstone.com; or
- Mail your concerns (marked “Private and Confidential”) to a Whistleblower Officer at our offices at 88 Gormanston Road, Moonah Tasmania 7009; or
- Make your report to Blundstone’s external auditors (WLF Accounting & Advisory) or the Australian Securities and Investments Commission (ASIC).

In certain circumstances you may also make a report to a journalist or member of parliament – see the section “Public Interest & Emergency disclosures” below.

To qualify for protection, the report **must** be made to one of the Eligible Recipients outlined above or to any other recipient prescribed by law, such as a director, officer or senior manager at Blundstone.

Emails to Whistleblower@blundstone.com will be sent to the Chief Financial Officer & Company Secretary and the Group Manager Legal & Compliance.

In making your report you should be factual and include as much detail as possible, including:

- The nature of the alleged Reportable Conduct believed to have occurred;
- When and where it took place;
- Who was involved, and any witnesses.

You will not be penalised in any way if the investigation finds that the disclosure cannot be substantiated and will still be protected by law, however action may be taken if a disclosure is found to be intentionally vexatious or without reasonable cause.

Anonymity

You can remain anonymous when making a report of misconduct. However, this may impact Blundstone’s ability to investigate your report. You may also not be able to receive information about the investigations or be afforded the protections and support available under this Policy and the law.

Public Interest & Emergency disclosures

A **public interest disclosure** can be made to a journalist or a parliamentarian if:

- You have already made a disclosure in accordance with this Policy; and
- At least 90 days have passed since you made that disclosure and you have reasonable grounds to believe that no action is being, or has been, taken to address the matters raised; and



- You have reasonable grounds to believe that making a further disclosure of the information would be in the public interest; and
- You provide notice to Blundstone.

An **emergency disclosure** can be made to a journalist or a parliamentarian if you have:

- Already made a disclosure in accordance with this Policy; and
- Reasonable grounds to believe that the information concerns a substantial and imminent danger to someone's health or safety or to the natural environment.

Conducting an Investigation

All disclosures made in accordance with this Policy will be investigated with the aim of establishing whether the relevant misconduct has occurred.

The CEO (or the Chairman, as appropriate) will appoint an Investigator. The Investigator will either possess sufficient knowledge of, or be allowed to obtain advice on, any technical, financial, legal or other matters that may be relevant to the investigation.

The Investigator will act fairly and independently and will not have any conflict of interest or personal connection to the person against whom the allegation has been made, the Whistleblower, or the misconduct.

Anyone involved in an investigation will be treated fairly. The CEO (or the Chairman, as appropriate) may determine that it is appropriate to stand down the person(s) alleged to have engaged in the misconduct for the duration of the investigation. This does not indicate any inference of wrongdoing or assumption of guilt. Any person against whom an allegation has been made will be given the opportunity to respond during the investigation.

During the course of the investigation, the Whistleblower and other involved parties are able to seek independent legal advice. The cost of such advice may be reimbursed by Blundstone, at the discretion of the CEO (or the Chairman, as appropriate).

As soon as practicable after completing the investigation the Investigator will prepare a report outlining their findings, including whether the alleged misconduct has been substantiated or not and any recommendations for appropriate actions to be taken. Actions may include notification to regulatory and/or enforcement agencies such as the Police. The report will be provided to the CEO and Board of Directors. The Investigator will also provide either a copy or summary of the report to the Whistleblower.

Additional Information

If you would like to speak to someone to obtain additional information before making a disclosure you can contact the Welfare Officer or any of the Whistleblower Officers.

Related documents

Corporations Act 2001 (Cth)

Taxation Administration Act 1953 (Cth)

Blundstone Company Values

Review of this Policy

This Policy will be reviewed every two years.