



Whistleblower Policy

Business Unit Owner: People & Culture

Document Owner: General Manager, People & Culture

Version	Prepared & Updated By	Reviewed By	Approved By	Date
V.2	Nely Moat, People & Culture Manager	Paul Denahy GM, P & C Sue Pemberton GRC Manager	PLC Board	17/02/2026

Table of Contents

Table of Contents.....	
1. Our Commitment	3
2. Purpose of this Policy	3
3. Relationship to other policies	3
4. Every person’s responsibility.....	3
5. Definitions	4
6. Who does this policy apply to?	4
7. Who may make a disclosure?.....	4
8. What misconduct should be disclosed?.....	4
9. Personal work-related grievances.....	5
10. How do I make a disclosure	5
Making a disclosure internally to our organisation	5
Making a disclosure to the independent service provider - Your Call.....	6
11. Where can I get information and advice?.....	7
12. Protections under the law	7
13. Do I have to disclose my identity?	7
14. Will my identity be treated confidentially?	8
15. Protection against detrimental conduct.....	9
16. Assessing and controlling the risk of detriment	10
17. Support and protection.....	11
18. What will the Parra Leagues Group do with the disclosure?.....	11
19. Investigation of the disclosure.....	11
20. How will the investigation be conducted?.....	12
21. Investigator’s Report.....	12
22. Will the whistleblower be kept informed?	12
23. What happens if the misconduct is proven?	13
24. Avenues for Review	13
25. What immunities are available to a whistleblower?	13
26. What are the consequences of making a false disclosure?	14
27. How will this policy be made available to officers and employees	14
of our organisation?.....	14
28. Training & Education.....	14
29. Review of this Policy	14
30. Approved By.....	14

1. Our Commitment

The Parra Leagues Group is committed to a culture of respect and ethical conduct in the way we work and relate to each other. We recognise the value of keeping the laws and standards that apply to us in our work and encourage everyone to report misconduct.

We will not tolerate corrupt, illegal or other undesirable conduct nor condone detrimental acts of anyone who intends to disclose or has disclosed misconduct.

2. Purpose of this Policy

PARRA's purpose of this policy includes the following

- to encourage more disclosures of wrongdoing;
- to help deter wrongdoing, in line with the entity's risk management and governance framework;
- to ensure individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported;
- to ensure disclosures are dealt with appropriately and on a timely basis;
- to provide transparency around the entity's framework for receiving, handling and investigating disclosures;
- to support PARRA's values and Code of Conduct;
- to support the entity's long-term sustainability and reputation;
- to meet the PARRA's legal and regulatory obligations; and
- to align with the ASX Corporate Governance Principles and Recommendations and relevant standards.

This policy is a very important tool for helping the Parra Leagues Group to identify wrongdoing that may not be uncovered unless there is a safe and secure means for disclosing wrongdoing.

Nothing in this policy is intended to change or take away any other protections which may be available at law.

3. Relationship to other policies

This policy:

- forms a part of PARRA's risk management system and corporate governance framework
- is one of the mechanisms in PARRA's risk management tool kit for identifying wrongdoing
- is available to all employees as part of their employment information

4. Every person's responsibility

Every person to whom this policy applies has a responsibility to:

- remain alert to misconduct
- report known or suspected misconduct in accordance with this policy
- act in a way that reduces, prevents or stops misconduct
- support (and not victimise) those who have made or intend to make a disclosure
- ensure the identity of the Discloser and the person/s who is the subject of the disclosure are kept confidential

5. Definitions

“Act” means Corporations Act 2001 (Commonwealth).

“Disclosure Officer” means a person authorised to receive disclosures under the Whistleblower Laws which includes Officers and Senior Managers. For the purpose of this policy, refer to point 10 for a list of PARRA’s authorised Disclosure Officers.

“Protection Officer” means the person appointed by PARRA to support and protect a Whistleblower, if necessary, from detrimental action.

“Whistleblower” means a person who makes a disclosure under this policy. They may also be referred to as a Discloser within this policy.

6. Who does this policy apply to?

This policy applies to anyone who has or is working for us or doing something in connection with their work for us.

It includes past and current:

- officers and managers
- board members
- employees
- volunteers
- individuals who supply goods and services to us and their employees
- work experience students
- commissioned agents and consultants
- a relative of an individual referred to above
- a dependent of an individual referred to above or of such an individual’s spouse

(collectively referred to as ‘Disclosers’).

7. Who may make a disclosure?

Any person defined as a discloser in the paragraph above may make a disclosure under this policy.

8. What misconduct should be disclosed?

If you have seen or have reasonable grounds to suspect misconduct, or an improper state of affairs or circumstances, concerning our organisation report it. (Disclosure)

Misconduct includes but is not limited to:

- illegal conduct, such as theft, dealing in, or use of illicit drugs, violence or threatened violence, and criminal damage against property
- fraud, money laundering or misappropriation of funds
- offering or accepting a bribe
- financial irregularities
- failure to comply with, or breach of, legal or regulatory requirements

- engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made, or be planning to make, a disclosure
- information that indicates a significant risk to public safety or the stability of, or confidence in, the financial system is also a disclosable matter, even if it does not involve a breach of a particular law
- serious inappropriate or unethical conduct
- serious misuse of information
- bullying, discrimination, harassment or other serious unacceptable behaviour
- serious breach of our policies and procedures or the law
- substantial waste of company resources
- causing substantial financial or non-financial loss or detriment to our organisation

(collectively referred to as “Misconduct”)

9. Personal work-related grievances

Personal work-related grievances are not matters of misconduct which can be reported under this policy and are not matters which provide specific whistleblower protections to the discloser under Australian law. Personal work-related grievances relate to current or former employment and have implications for the discloser personally but do have significant implications for the organisation or do not relate to misconduct disclosable under this policy. Examples of personal work-related grievances include:

- an interpersonal conflict between the whistleblower and another employee
- a decision that does not involve a breach of workplace laws
- a decision relating to the engagement, transfer or promotion of the whistleblower
- a decision relating to the terms and conditions of engagement of the whistleblower
- a decision to suspend or terminate the engagement of the whistleblower, or otherwise to discipline the whistleblower

Personal work-related grievances should be internally raised using the Grievance policy which can be located via:

The Employment Hero Work App; or

<http://secure.employmenthero.com>; or

People & Culture department: people@parraleagues.com.au

10. How do I make a disclosure

A disclosure may be made:

1. internally to our organisation
2. to independent whistleblower service provider – Your Call
3. to external authorities and entities

Making a disclosure internally to our organisation

We support openness and teamwork. This policy is not intended to replace our first obligation to resolve issues quickly and internally where appropriate. All reasonable attempts to resolve an issue

should first be tried. You are encouraged to raise misconduct as early as possible with your supervisors and managers and to resolve misconduct informally and internally where appropriate.

If it is not appropriate to resolve informally you may make a disclosure to:

- The Chief Executive Officer
- The Chief Financial Officer
- General Manager – People & Culture
- Chair of the Board
- Chair of Board Risk & Compliance Committee
- a person authorised by our company to receive disclosures

PARRA’s Disclosure Officers to whom you may make a disclosure and their contact details are set out below.

Name and position	Location	Contact details
Paul Denahy, General Manager People & Culture	Level 4, Parramatta Leagues Club	8833 0761 paul.denahy@parraleagues.com.au
Grant Allsopp, Chief Financial Officer	Level 4, Parramatta Leagues Club	8833 0783 grant.allsopp@parraleagues.com.au
Chris Dimou, Chief Executive Officer	Level 4, Parramatta Leagues Club	8833 0732 chris.dimou@parraleagues.com.au

If you are making a disclosure concerning the members of the Executive Team or Board of Parra Leagues Club Group **internally**, you may report as follows:

Disclosure concerning:	Contact
- CEO and Executive Team:	Chair of Audit and Risk Committee
- Board member (excluding the President):	President of the Board
- President of the Board:	Chair of Audit and Risk Committee

[Making a disclosure to the independent service provider - Your Call](#)

If for any reason you do not feel safe or able to make a disclosure internally you may do so to our independent whistleblower service provider, Your Call.

Your Call operates under a Service Agreement with our organisation and acts as the intermediary, providing the means for a whistleblower to retain anonymity. Disclosures received by Your Call are reported to PARRA in accordance with this policy. Your Call also enables us to obtain further information if required and enables the whistleblower to receive updates from us.

This is done via the use of an online anonymous Message Board which the whistleblower will have access to after making a disclosure.

The Message Board allows you to:

- communicate with Your Call and/or PARRA without revealing your identity
- securely upload any relevant documentation and/or material that you wish to provide
- receive updates

- request support or report detrimental acts

This option allows you to:

- remain completely anonymous if you wish
- identify yourself to Your Call only
- identify yourself to both Your Call and PARRA

Your Call enables disclosures to be made anonymously and confidentially. Whilst we prefer whistleblowers to disclose their identity in order to facilitate an investigation, whistleblowers are not required to identify themselves and will not be named in any report to our organisation unless they have consented to their identity being disclosed.

Your Call reporting options include:

- Website: <https://yourcall.com.au/parralegues.com>
Available 24/7
- Telephone: 1300 790 228
Available 9am and 12am on recognised Australian national business days (AEST)



Online reports can be made via the website address listed above. Our organisation's unique identifier code is: "PLC".

In the event a disclosure received by Your Call relates to a Disclosure Officer, Your Call will exclude that Disclosure Officer from all communications when providing the disclosure to our organisation. The Disclosure Officers who are not named in the disclosure will then receive and determine how the matter will be addressed or investigated as required.

To ensure impartiality, any person involved in handling or investigating a disclosure must declare any perceived or actual conflict of interest. Where a conflict is identified, that individual will be excluded from the process, and an alternative officer or investigator will be appointed. All steps taken to manage conflicts will be documented to maintain transparency and fairness.

Your Call remains an independent intermediary at all times and will only communicate with those authorised within our organisation.

National Relay Service

If you are deaf, or have a hearing or speech impairment, you can contact Your Call online or through the National Relay Service. Simply choose your contact method at www.relayservice.gov.au and request Your Call's hotline 1300 790 228.

11. Where can I get information and advice?

If you need information and advice about making a disclosure or the support and protection available you may discuss the matter in confidence with the Disclosure Officers or Your Call. Note: In

the event you do not formally make a disclosure we may nevertheless be compelled to act on the information provided during the discussion if the information reasonably suggests misconduct has or may occur.

12. Protections under the law

To qualify for protection as a whistleblower under the Act and to receive specific legal rights you must meet all three of the following requirements:

- you must be an eligible discloser (as defined in section 6)
- disclose reportable conduct subject to the work grievance exemptions (as defined in section 8)
- make the disclosure through an appropriate reporting channel and recipient (as defined Section 10)

13. Do I have to disclose my identity?

There is no requirement for a whistleblower to identify themselves in order for a disclosure to qualify for protection under the Act. A discloser can:

- choose to remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised, and
- refuse to answer questions that they feel could reveal their identity at any time, including during follow-up conversations.

PARRA encourages disclosers who wishes to remain anonymous to maintain ongoing two-way communication with us, so we can ask follow-up questions or provide feedback.

14. Will my identity be treated confidentially?

Your identity will not be disclosed by Your Call or PARRA unless:

- you consent to disclosing your identity
- the disclosure is required by law
- it is necessary to prevent a serious threat to a person's health or safety
- it is reasonably necessary for investigating the issues raised in the disclosure.

PARRA has in place the following measures and mechanisms for protecting the confidentiality of a discloser's identity:

- all personal information or reference to the discloser witnessing an event will be redacted
- the discloser will be referred to in a gender-neutral context
- where possible, the discloser will be contacted to help identify certain aspects of their disclosure that could inadvertently identify them and
- disclosures will be handled and investigated by qualified staff.

Secure record-keeping and information-sharing processes:

- all paper and electronic documents and other materials relating to disclosures will be stored securely in the Rely platform.

- access to all information relating to a disclosure will be limited to those directly involved in managing and investigating the disclosure
- only a restricted number of people who are directly involved in handling and investigating a disclosure will be made aware of a discloser's identity (subject to the discloser's consent) or information that is likely to lead to the identification of the discloser
- communications and documents relating to the investigation of a disclosure will not to be sent to an email address or to a printer that can be accessed by other staff and
- each person who is involved in handling and investigating a disclosure will be reminded about the confidentiality requirements, including that an unauthorised disclosure of a discloser's identity may be a criminal offence

An unauthorised disclosure of: the identity of a whistleblower, or information that is likely to lead to the identification of the whistleblower where the information was obtained because of the disclosure, will be regarded as a disciplinary matter and will be dealt with in accordance with the Parra Leagues Group's disciplinary procedures. It is also an offence/contravention under the Act which carries serious penalties for individuals and companies. If you are a discloser of a reportable matter and your identity is revealed without your consent, you may also be eligible to claim compensation and remedies under the Act.

As a discloser you should be aware that in practice, people may be able to guess your identity if: you have previously mentioned to other people that you are considering making a disclosure; you are one of a very small number of people with access to the information; or your disclosure relates to information that you have previously been told privately and in confidence.

You can lodge a complaint with us if you believe a breach of your confidentiality as a discloser has occurred by contacting one of the Disclosure Officers. You can also lodge a complaint with a regulator including ASIC, APRA or the ATO if you believe a breach of your confidentiality as a discloser has occurred.

15. Protection against detrimental conduct

PARRA will do everything reasonably possible to support and protect anyone who:

- intends to or actually makes a disclosure
- is mentioned in the disclosure
- acts as a witness
- otherwise assists with the investigation and resolution of the disclosure from detrimental conduct, acts and omissions.

Examples of detrimental conduct, acts and omissions include but are not limited to:

- dismissal of an employee
- alteration of an employee's position or duties to their disadvantage
- harassment or intimidation of a person
- harm or injury to a person, including psychological harm
- damage to a person's reputation

Examples of actions that are not detrimental conduct and omissions include but are not limited to:

- administrative action that is reasonable for the purpose of protecting a discloser from detriment (e.g. moving a discloser who has made a disclosure about their immediate work area to another office to prevent them from detriment) and
- managing a discloser's unsatisfactory work performance, if the action is in line with the entity's performance management framework.

PARRA has in place the following measures and mechanisms to protect disclosers from detriment:

- processes for assessing the risk of detriment against a discloser and other persons (e.g. other staff who might be suspected to have made a disclosure), which will commence as soon as possible after receiving a disclosure
- support services (including counselling or other professional or legal services) that are available to disclosers
- actions for protecting a discloser from risk of detriment—for example, we may allow the discloser to perform their duties from another location, reassign the discloser to another role at the same level, make other modifications to the discloser's workplace or the way they perform their work duties, or reassign or relocate other staff involved in the disclosable matter
- processes for ensuring that Disclosure Officers are aware of their responsibilities to maintain the confidentiality of a disclosure, address the risks of isolation or harassment, manage conflicts, and ensure fairness when managing the performance of, or taking other management action relating to, a discloser
- procedures on how a discloser can lodge a complaint if they have suffered detriment, and the actions we may take in response to such complaints (e.g. the complaint may be investigated as a separate matter by an officer who is not involved in dealing with disclosures and the investigation findings will be provided to the board or audit or risk committee); and
- interventions for protecting a discloser if detriment has already occurred—for example, we may investigate and address the detrimental conduct, such as by taking disciplinary action, or we may allow the discloser to take leave, develop a career development plan for the discloser that includes new training and career opportunities, or other remedies.

PARRA will thoroughly investigate reports of detrimental acts. If proven, those who have victimised another will be subject to disciplinary action up to and including dismissal. It is also an offence/contravention under the Act which carries serious penalties for individuals and companies. If you are a discloser of a reportable matter and you suffer detrimental acts, you may also be eligible to claim compensation and remedies under the Act. Nothing in this policy is intended to change or take away any other protections which may be available at law.

16. Assessing and controlling the risk of detriment

PARRA has established processes for assessing and controlling the risk of detriment and keeps records of its risk assessments and risk control plans.

Steps in PARRA's framework for assessing and controlling the risk of detriment include:

- Risk identification: We assess whether anyone may have a motive to cause detriment—information may be gathered from a discloser about:
 - the risk of their identity becoming known;
 - who they fear might cause detriment to them;
 - whether there are any existing conflicts or problems in the workplace; and
 - whether there have already been threats to cause detriment.
- Risk analysis and evaluation: We analyse and evaluate the likelihood of each risk and evaluate the severity of the consequences.
- Risk control: We develop and implement strategies to prevent or contain the risks—for anonymous disclosures, we assess whether the discloser’s identity can be readily identified or may become apparent during an investigation.
- Risk monitoring: We monitor and reassess the risk of detriment where required—the risk of detriment may increase or change as an investigation progresses, and even after an investigation is finalised

17. Support and protection

If necessary, PARRA will appoint a Protection Officer to arrange or coordinate support and protection for anyone who has or is in the process of making a disclosure.

The discloser can contact the General Manager People & Culture to discuss how a Protection Officer may be able to provide support and protection.

The Protection Officer is appointed by PARRA to:

- assess the immediate welfare and protection needs of a whistleblower
- safeguard the interests of a whistleblower in accordance with this policy and the law
- address any issues or concerns of detrimental acts/detrimental treatment

The PARRA Group may appoint a person from within the organisation or a third party to be the Protection Officer.

18. What will the Parra Leagues Group do with the disclosure?

The Disclosure Officer has been appointed by PARRA to receive the disclosure directly from you (if you make an internal disclosure to our organisation) or from Your Call (if you make an external disclosure to Your Call).

The Disclosure Officer will:

- carefully assess the information provided to decide the best action to take, including whether an investigation is required, to determine whether the misconduct is proven or not proven
- keep the information provided in the Rely platform
- coordinate and oversee the investigation where an investigator has been appointed
- appoint a Protection Officer to support and protect the whistleblower, if necessary, from detrimental acts

- advise the whistleblower (through Your Call where anonymity is requested) of the progress of the matter to the extent it is legally permissible and appropriate to do so
- take all reasonable steps to ensure fair treatment for and to ensure the identity of the whistleblower and the person/s who is the subject of the disclosure are kept confidential. An employee who is the subject of a disclosure will be advised about the subject matter of the disclosure as and when required by principles of natural justice and procedural fairness and prior to any actions being taken. An employee who is the subject of a disclosure may contact the entity's support services Benestar on 1300 360 364 or online www.benestar.com

19. Investigation of the disclosure

The Disclosure Officer will carefully assess and use the information provided in the disclosure to decide the best action to take, including whether an investigation is required and, if so, determine the appropriate investigation process, including:

- the nature and scope of the investigation
- who will conduct the investigation and whether that person should be external to our organisation
- the nature of any technical, financial or legal advice that may be required
- a timeframe for the investigation (having regard to the level of risk)

20. How will the investigation be conducted?

The investigation will be conducted in a constructive, impartial and lawful way according to the principles of natural justice and procedural fairness and all efforts will be made to meet investigation best practices.

The Investigator will:

- gather information, material and documentation concerning the disclosure as quickly as possible. (This may involve taking steps to protect or preserve documents, materials and equipment.)
- focus on the substance of the disclosure and will not focus on the motives of the discloser
- not assume that disclosures about conduct or behaviour that appear to have had a personal impact on a discloser is somehow less serious. The discloser's experience may indicate a larger or systemic issue.
- take a statement or record of interview and or tape formal interviews with witnesses as required (Where the whistleblower wishes to remain anonymous and does not wish to make a statement they will not be asked to do so.)
- keep information gathered in the investigation securely
- take all reasonable steps to protect the identity of the whistleblower. Where disclosure of the identity of the whistleblower cannot be avoided due to the nature of the allegations; the investigator will first gain the consent of the whistleblower before providing identifying information to any additional persons
- complete the investigation and provide a report of their findings as soon as is reasonably Practical

21. Investigator's Report

At the conclusion of the investigation, the investigator will provide a written report to the relevant person being a Disclosure Officer, or the CEO, or the Chair of the Board, or the Chair of the Risk & Compliance Committee from the PARRA Group. The report will also be provided to external organisations as required by law of the Act. The report will include:

- a finding of all relevant facts
- whether the disclosure is proven, not proven or otherwise
- recommendation/s, when requested to do so, as to any action that may be taken in respect of the findings
- Where required implement mitigations, controls and remediate any substantiated concerns or issues

PARRA will use the report to determine the action (if any) to be taken including disciplinary action. The findings will be communicated to the relevant parties involved to the extent that it is legally permissible and appropriate to do so.

22. Will the whistleblower be kept informed?

Subject to privacy and confidentiality requirements the whistleblower will be kept informed of:

- when the investigation process has begun
- relevant progress of the investigation
- the outcome of the investigation

to the extent that it is legally permissible and appropriate to do so.

23. What happens if the misconduct is proven?

If the misconduct is proven the Parra Leagues Group will decide what action to take including disciplinary action up to and including dismissal. The disciplinary action will depend on the severity, nature and circumstance of the misconduct.

24. Avenues for Review

A discloser may request a review of the investigation findings if the discloser is not satisfied with the outcome. The review will be conducted by an officer who is not involved in handling and investigating disclosures and the review findings will be shared with the board or audit or risk committee.

PARRA is not obliged to reopen an investigation if it finds that the investigation was conducted properly, or new information is either not available or would not change the findings of the investigation.

25. What immunities are available to a whistleblower?

The Parra Leagues Group wants you to speak up against misconduct. Anyone who makes a disclosure:

- with reasonable grounds for suspecting misconduct has or may occur, and
- has not engaged in serious misconduct or illegal conduct relating to the disclosure

will be provided with immunity from disciplinary action.

If you make a disclosure that qualifies for protection under the Act:

- you are not subject to any civil, criminal or administrative liability (including disciplinary action) for making the disclosure; and
- no contractual or other remedy may be enforced, and no contractual or other right may be exercised, against you on the basis of the disclosure; and
- the information is not admissible in evidence against the whistleblower in criminal proceedings or in proceedings for the imposition of a penalty, other than proceedings in respect of the falsity of the information.

Note: Except as provided for by the Act it does not prevent a whistleblower being subject to any civil, criminal or administrative liability for conduct of the whistleblower that is revealed by the disclosure.

26. What are the consequences of making a false disclosure?

Anyone who makes a disclosure knowing it to be false or misleading may be subject to disciplinary action up to and including dismissal. The disciplinary action will depend on the severity, nature and circumstance of the false disclosure.

The Parra Leagues Group however does not wish to deter staff from making disclosures. In cases where disclosers have some information leading to a suspicion, but not all the details, staff are encouraged to speak up and report the misconduct and will not face disciplinary action in those circumstances.

27. How will this policy be made available to officers and employees of our organisation?

The Parra Leagues Group makes the policy available to employees and officers by:

- posting the policy in the HRIS platform
- the company website
- posting information on staff noticeboards
- setting out the policy in the employee handbook, and
- incorporating the policy in employee on boarding and training for new starters.

28. Training & Education



The People & Culture Team will be responsible for delivering ongoing education and training, including refresher training every 12 months on the whistleblower policy and procedures to all staff. Continued awareness of policy via internal communication plan.

29. Review and Oversight of this Policy

The Board Risk & Compliance Committee will monitor and review this policy and associated processes and procedures (annually/other) to ensure it meets its objectives.

Any amendments to this policy shall be made known to employees and officers of our organisation by posting an updated version of the policy as per point 27 of this policy, the website and providing training when necessary.

30. Approved By

 <p>Chris Dimou Chief Executive Officer Date: 4th February 2025</p>	 <p>Paul Denahy General Manager People & Culture Date: 4th February 2025</p>
--	--