

Whistleblower Policy

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Version	2	Review frequency	Annually
Responsible person	CEO	Scheduled review date	October 2026

MND Australia (MNDA) is committed to the principles of transparency and accountability and views whistleblowing as providing MNDA with an opportunity to:

- identify and address illegal, improper or unethical conduct (collectively referred to in this policy as “wrongdoing” for ease of reference),
- enhance organisational procedures and
- promote an ethical culture.

MNDA encourages anyone who is in possession of information relating to wrongdoing by MNDA or by those associated with MNDA to disclose it as soon as practicable. This policy details the protections that will apply to disclosers of such information and the related procedures.

The *Corporations Act 2001* (Corporations Act) provides certain legal rights and protections for people who meet the definition of an “eligible whistleblower”. This policy describes those rights and protections and sets out relevant definitions. For further information about who can qualify for protections as an “eligible whistleblower” under the Corporations Act, please see ASIC Information Sheet 238 *Whistleblower rights and protections*.

Scope and Approval

This policy applies to	This policy applies to “our people”, including: a. current and former MNDA employees; b. current and former MNDA Directors; c. volunteers; d. service providers or contractors who are providing, or have provided, goods or services to MNDA – whether paid or unpaid; and e. any person who discloses information covered by this policy.
Policy approval	This policy is approved by the MNDA Board and reviewed annually.

Policy context – Other relevant information can be found in ASIC Information Sheets 238 and 239 and in:

Standards	AICD Governance Principles ACNC Governance Standards
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Legislation	• The <i>Corporations Act 2001</i> • The <i>Taxation Administration Act 1953</i> • The <i>Fair Work Act 2009</i>
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1. Definitions

Confidentiality: is when one's identity is protected to prevent harm. In the case of a whistleblower, their identity may be known to those receiving and investigating the disclosure relating to wrongdoing, but is protected from the broader organisation and public.

Detrimental conduct: Conduct, or a threat to engage in conduct, that causes detriment to a discloser.

Disclosable matter: Information to which the whistleblower protections apply.

Discloser: An individual who discloses wrongdoing or an eligible whistleblower.

Disclosure: A disclosure of information relating to wrongdoing or a disclosable matter.

Disclosures qualifying for protection: Disclosures pertaining to tax matters are referred to as "disclosures qualifying for protection".

Eligible recipient: An individual who can receive a disclosure.

Eligible whistleblower: An individual to whom the whistleblower protections apply.

Emergency disclosure: The disclosure of information to a journalist or parliamentarian, where the discloser has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment.

Personal information: Information or an opinion about an identified individual, or about an individual who is reasonably identifiable, whether:

- true or not; and
- recorded in a material form or not.

Personal work-related grievance: A disclosure that relates to the discloser's current or former employment, which has implications for the discloser personally, but does not:

- have any other significant implications for the organisation (or another organisation); or
- relate to conduct, or alleged conduct, about a disclosable matter.

Public interest disclosure: The disclosure of information to a journalist or a parliamentarian, where the discloser has reasonable grounds to believe that making a further disclosure of the information is in the public interest. The disclosure must meet a number of other criteria to qualify.

Whistleblower: A discloser who has made a disclosure that qualifies for protection under the *Corporations Act 2001*.

Whistleblower protection officer (WPO): The role under MNDA's Whistleblower Policy that is responsible for protecting or safeguarding disclosers and ensuring the integrity of the

reporting mechanism. The MNDA Chief Executive Officer is MNDA's WPO, unless the disclosure relates to the CEO: see section 3.

2. Purpose

MNDA's whistleblower policy is an important tool for helping our organisation to identify any wrongdoing that may not be discovered unless there is a safe and secure means for disclosing wrongdoing.

Our policy is drafted with the intention of addressing the following aims:

- to encourage disclosures of wrongdoing;
- to help deter wrongdoing, in line with our organisation'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 our organisation's framework for receiving, handling, and investigating disclosures;
- to support our organisation's values and code of conduct;
- to support our organisation's long-term sustainability, ethical culture and reputation; and
- to meet our organisation's legal and regulatory obligations.

3. Roles and responsibilities: whistleblower protection officer (WPO)

MNDA has nominated an appropriately qualified/experienced whistleblower protection officer (WPO). The MNDA Chief Executive Officer is the organisation's WPO (unless the disclosure relates to the CEO). If the disclosure relates to the CEO, the disclosure should be made to the Chair of the MNDA Board.

The responsibilities of the WPO include:

- implementing MNDA's whistleblower protection policy;
- initial response to an allegation of wrongdoing;
- ensuring the protection and/or anonymity of the discloser, where possible;
- conducting or assisting in investigations into alleged wrongdoing;
- informing the discloser of the progress and outcomes of investigations;
- ensuring that disclosers do not suffer any retaliation or negative consequences; and
- providing support and referrals for both disclosers and those accused of wrongdoing.

MNDA will ensure that this policy is published on its website so that the identity of the WPO is publicly available.

4. Application of the policy: who is an “eligible whistleblower”

Under this policy, an eligible whistleblower is:

An individual who is, or has been, any of the following in relation to MNDA:

- a) a Board member, employee or volunteer;
- b) a contractor or supplier of services or goods to the organisation (whether paid or unpaid),
- c) an associate of the organisation; and
- d) a relative, dependant or spouse of an individual listed in (a) to (c).

A discloser will qualify for protection as a whistleblower under the *Corporations Act 2001* if they are an “eligible whistleblower” in relation to MNDA *and*:

- a) they have made a disclosure of information relating to a “disclosable matter” directly to an “eligible recipient” or to ASIC, APRA or another Commonwealth body prescribed by regulation;
- b) they have made a disclosure to a legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the whistleblower provisions in the *Corporations Act 2001*; or
- c) they have made an “emergency disclosure” or “public interest disclosure”.

The terms in italics are explained in sections 5 and 6.

5. Matters this policy applies to

Disclosures that are not about “disclosable matters” do not qualify for protection under the *Corporations Act 2001* (or the *Tax Administration Act 1953*, where relevant). Such disclosures may be protected under other legislation, such as the *Fair Work Act 2009*.

Disclosable matters

Matters that qualify for protection under the *Corporations Act 2001* are “disclosable matters”. “Disclosable matters” involve information that the discloser has reasonable grounds to suspect concerns misconduct, or an improper state of affairs or circumstances, in relation to MNDA.

MNDA encourages individuals who have reasonable grounds to suspect wrongdoing to provide as much information as possible, including details of the wrongdoing, people involved, dates, locations, and other relevant facts.

Individuals are expected to have reasonable grounds to suspect the information they are disclosing is true and accurate and they must not make a report that they know is untrue or misleading. Deliberate false reporting will not result in the protections for disclosers that are described in this Policy. Deliberate false reporting is not a protected disclosure and those who knowingly make a false disclosure report may face disciplinary action.

MNDA considers the following to be “disclosable matters”:

- illegal conduct, such as theft, dealing in, or use of illicit drugs, violence or threatened violence, and criminal damage against property

- 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.
- breach of MNDA's Code of Conduct or other Board or operational policies
- dishonest, unethical or irresponsible behaviour
- breaches of privacy
- financial irregularities
- concerns that pose a danger to MNDA, its directors, employees or volunteers; and
- fraud, negligence, default, breach of trust and breach of duty.

A discloser can still qualify for protection even if their disclosure turns out to be incorrect.

Personal work-related grievances

Personal work-related grievances are those that relate to your current or former employment and which only have implications for you personally, with no other significant implications for MNDA, or other matters of misconduct beyond your personal circumstances.

Disclosures that relate solely to personal work-related grievances, and that do not relate to detriment or threat of detriment to the discloser, do not qualify for protection under the *Corporations Act 2001*.

Examples of a personal work-related grievance include:

- a) an interpersonal conflict between the discloser and another employee;
- b) a decision that does not involve a breach of workplace laws;
- c) a decision about the engagement, transfer, or promotion of the discloser;
- d) a decision to suspend or terminate the engagement of the discloser, or otherwise to discipline the discloser.

Personal work-related grievances should be addressed with MNDA's CEO, or, if the grievance relates to the CEO, should be raised with the Chair of the MNDA Board.

However, a personal work-related grievance may still qualify for protection if:

- a) it includes information about misconduct, or information about misconduct includes or is accompanied by a personal work-related grievance (mixed report);
- b) MNDA has breached employment or other laws punishable by imprisonment for a period of 12 months or more, engaged in conduct that represents a danger to the public, or the disclosure relates to information that suggests misconduct beyond the discloser's personal circumstances;
- c) the discloser suffers from or is threatened with detriment for making a disclosure; or
- d) the discloser seeks legal advice or legal representation about the operation of the whistleblower protections under the *Corporations Act 2001*.

6. Who can receive a disclosure

Eligible recipients (those who can receive disclosures that qualify for protection)

An “eligible recipient” is someone who receives disclosures that qualify for protection.

A discloser must make a disclosure directly to one of MNDA’s eligible recipients in order to be able to qualify for protection as a whistleblower under the *Corporations Act 2001* (or the *Taxation Administration Act 1953*, where relevant).

An eligible recipient is:

- the Chief Executive Officer
- the Chair of the MNDA Board
- the Board Secretary of MNDA
- or if the disclosure concerns the CEO, the Chair and the Secretary, another Director of MNDA

Legal practitioners

Disclosures to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions in the *Corporations Act 2001* are protected (even in the event that the legal practitioner concludes that a disclosure does not relate to a “disclosable matter”).

Regulatory bodies and other external parties

Disclosures of information relating to disclosable matters can be made to ASIC, APRA or another Commonwealth body prescribed by regulation, and will qualify for protection under the *Corporations Act 2001*.

Employees can access more information on making an external disclosure by accessing the [ASIC Information Sheet 239](#) *How ASIC handles whistleblower reports*.

Public interest disclosures and emergency disclosures

Disclosures can be made to a journalist or parliamentarian under certain circumstances and qualify for protection.

It is important for the discloser to understand the criteria for making a public interest or emergency disclosure. The disclosure must have previously been made to ASIC, APRA or a prescribed body, and the discloser must notify this body that they intend to make a public interest disclosure.

In the case of a public interest disclosure, at least 90 days must have passed since the previous disclosure.

A discloser should contact an independent legal adviser before making a public interest disclosure or an emergency disclosure.

The full criteria for a 'public interest disclosure' and an 'emergency disclosure' are as follows –

A 'public interest disclosure' is the disclosure of information to a journalist or a parliamentarian, where:

- a) at least 90 days have passed since the discloser made the disclosure to ASIC, APRA or another Commonwealth body prescribed by regulation;
- b) the discloser does not have reasonable grounds to believe that action is being, or has been taken, in relation to their disclosure;
- c) the discloser has reasonable grounds to believe that making a further disclosure of the information is in the public interest; and
- d) before making the public interest disclosure, the discloser has given written notice to the body to which the previous disclosure was made that:
 - i) includes sufficient information to identify the previous disclosure; and
 - ii) states that the discloser intends to make a public interest disclosure.

An 'emergency disclosure' is the disclosure of information to a journalist or parliamentarian, where:

- a) the discloser has previously made a disclosure of the information to ASIC, APRA or another Commonwealth body prescribed by regulation;
- b) the discloser has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment;
- c) before making the emergency disclosure, the discloser has given written notice to the body to which the previous disclosure was made that:
 - i) includes sufficient information to identify the previous disclosure; and
 - ii) states that the discloser intends to make an emergency disclosure; and
- d) the extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the journalist or parliamentarian of the substantial and imminent danger.

7. How to make a disclosure

MNDA encourages disclosures to one of MNDA's eligible recipients: see section 6. Disclosers are encouraged to disclose information in-person, on the phone, or via email.

Disclosures can also be made to legal practitioners, regulatory and other external bodies in the circumstances described in section 6.

Anonymous disclosures

Disclosures can be made anonymously and still be protected under the *Corporations Act 2001*.

A discloser can choose to remain anonymous while making a disclosure, over the course of

the investigation and after the investigation is finalised. A discloser can refuse to answer questions that they feel could reveal their identity at any time, including during follow-up conversations.

A discloser who wishes to remain anonymous should maintain communication with MNDA so that it can ask follow-up questions or provide feedback.

If a disclosure comes from an email address from which the person's identity cannot be determined, and the discloser does not identify themselves in the email, MNDA will treat it as an anonymous disclosure.

MNDA outlines the following measures/mechanisms for protecting anonymity:

- If you wish to remain anonymous, you are encouraged to submit information via a de-identified email address, or via post, with mail addressed to the eligible recipient.
- a discloser may adopt a pseudonym for the purpose of their disclosure— this may be appropriate in circumstances where the discloser's identity is known to the whistleblower protection officer, or but the discloser prefers not to disclose their identity to others.

8. Legal protections for disclosers

Protections apply not only to internal disclosures, but to disclosures to legal practitioners, regulatory and other external bodies, and public interest and emergency disclosures that are made in accordance with the *Corporations Act 2001*.

Identity protection (confidentiality)

MNDA has a legal obligation to protect the confidentiality of a discloser's identity.

A person cannot disclose the identity of a discloser or information that is likely to lead to the identification of the discloser (which they have obtained directly or indirectly because the discloser made a disclosure that qualifies for protection).

An exception to this confidentiality obligation is if a person discloses the identity of the discloser:

- a) to ASIC, APRA, or a member of the Australian Federal Police (within the meaning of the *Australian Federal Police Act 1979*);
- b) to a legal practitioner (for the purposes of obtaining legal advice or legal representation about the whistleblower provisions in the *Corporations Act 2001*);
- c) to a person or body prescribed by regulations; or
- d) with the consent of the discloser.

A person can disclose the information contained in a disclosure with or without the discloser's consent if:

- a) the information does not include the discloser's identity;
- b) the organisation has taken all reasonable steps to reduce the risk that the discloser will be identified from the information (e.g., removing the discloser's name, position title and other identifying details); and

- c) it is reasonably necessary for investigating the issues raised the disclosure.

It is illegal for a person to identify a discloser or disclose information that is likely to lead to the identification of the discloser, outside the exceptions detailed above.

A discloser can lodge a complaint with MNDA about a breach of confidentiality, by contacting the WPO.

A discloser may also lodge a complaint with a regulator, such as ASIC, APRA or the ATO.

Disclosers are encouraged to seek independent legal advice, or advice from regulatory bodies such as ASIC and the ACNC. The use of independent whistleblowing service providers is also encouraged.

Protection from detrimental acts or omissions

MNDA or any individual cannot engage in conduct that causes detriment to a discloser (or another person), in relation to a disclosure, if:

- a) they believe or suspect that the discloser (or another person) made, may have made, proposes to make, or could make a disclosure that qualifies for protection; and
- b) the belief or suspicion is the reason, or part of the reason, for the conduct.

In addition, MNDA (or any individual) cannot make a threat to cause detriment to a discloser (or another person) in relation to a disclosure. A threat may be express or implied, or conditional or unconditional. A discloser (or another person) who has been threatened in relation to a disclosure does not have to actually fear that the threat will be carried out.

Examples of detrimental conduct that are prohibited under the law are listed in (a) to (j) below. Those who make a disclosure to MNDA, will not be subject to any of the following forms of detrimental conduct as a consequence of their disclosure:

- a) dismissal
- b) injury in employment;
- c) alteration of an employee's position or duties to his or her disadvantage;
- d) discrimination between an employee and other employees of MNDA;
- e) harassment or intimidation;
- f) harm or injury, including 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; or
- j) any other damage to a person.

Examples of actions *that are not* detrimental conduct include the following:

- 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 protect them from detriment); and

- managing a discloser's unsatisfactory work performance, if action is in line with MNDA's performance management framework.

MNDA will strive to ensure that a discloser understands the reason for any administrative or management action.

Compensation and other remedies

A discloser (or any other employee or person) can seek compensation and other remedies through the courts if:

- a) they suffer loss, damage, or injury because of a disclosure; and
- b) MNDA failed to take reasonable precautions and exercise due diligence to prevent the loss, damage or injury.

Disclosers are encouraged to seek independent legal advice in relation to compensation and other remedies.

Civil, criminal, and administrative liability protection

A discloser is protected from any of the following in relation to their disclosure:

- a) civil liability (e.g., any legal action against the discloser for breach of an employment contract, duty of confidentiality or another contractual obligation);
- b) criminal liability (e.g., attempted prosecution of the discloser for unlawfully releasing information, or other use of the disclosure against the discloser in a prosecution (other than for making a false disclosure)); and
- c) administrative liability (e.g., disciplinary action for making the disclosure).

These protections do not grant immunity for any misconduct a discloser has engaged in that is revealed in their disclosure

9. Support and practical protection for disclosers

Identity protection (confidentiality)

MNDA will implement the following measures and mechanisms to protect the confidentiality of a discloser's identity:

Reducing the risk that the discloser will be identified from the information contained in a disclosure

- 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 persons.

Secure record-keeping and information-sharing processes

- all paper and electronic documents and other materials relating to disclosures will be

stored securely;

- 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 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.

Protection from detrimental acts or omissions

MNDA has available to it the measures and mechanisms listed below to assess and control the risk of detriment to whistleblowers. If you believe you have been subjected to a detriment because of the actual or intended disclosure, or if you believe that there has been a breach of confidentiality, you should immediately report the matter to the WPO so prompt action can be taken to protect against further detrimental acts or omissions. Reports of detrimental conduct will be treated confidentially. You may also seek independent legal advice or contact regulatory bodies if you believe you have suffered a detriment.

Examples of measures and mechanisms that are available to MNDA to assess and control the risk of detriment to whistleblowers are:

- 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 MNDA receiving a disclosure;
- support services (including counselling or other professional or legal services) that are available to disclosers;
- strategies to help a discloser minimise and manage stress, time or performance impacts, or other challenges resulting from the disclosure or its investigation;
- actions for protecting a discloser from risk of detriment - for example, MNDA could 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 management 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 the organisation may take in response to such complaints (e.g., the complaint could 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 MNDA Board); and

- interventions for protecting a discloser if detriment has already occurred - for example, MNDA could investigate and address the detrimental conduct, such as by taking disciplinary action, or could allow the discloser to take extended leave, develop a career development plan for the discloser that includes new training and career opportunities, or offer compensation or other remedies.

A discloser may seek independent legal advice or contact regulatory bodies, such as ASIC, APRA or the ATO, if they believe they have suffered detriment.

10. Handling and investigating a disclosure

Handling a disclosure

All disclosures will be promptly formally acknowledged (where the discloser is able to be contacted) and will be given serious consideration and will be dealt with fairly and impartially;

After MNDA receives a disclosure or a potential disclosure, an initial assessment will be made by the CEO in the CEO's capacity as the WPO to determine whether the disclosure meets the criteria for a disclosure under this Policy; and if it does so, to determine how the disclosure will be dealt with.

Options available to the CEO include but are not limited to the following: to seek further information from the discloser; to seek legal advice; to refer the matter to the Police; to refer the matter to the Board for its advice on the appropriate way of addressing the disclosure; to engage a qualified external investigator to conduct an independent investigation of the disclosure and prepare a report and recommendations; or for the CEO to conduct an internal investigation of the disclosure.

The CEO will promptly refer any disclosure relating to the CEO or to a Director of the MNDA Board to the Chair of the Board for appropriate action.

Whatever option is implemented the CEO will ensure that the Chair of the Board and the Board is kept appropriately informed.

Investigating a disclosure

The aim of an investigator is to identify and gather relevant information and documents, to assess and evaluate this material and to then make written findings as to whether the facts alleged in the disclosure have been substantiated, and to make recommendations as to what further action should be taken.

Prior to commencement of an investigation, the investigator usually prepares an investigation plan. The investigator will observe the rules of natural justice and procedural fairness in relation to all persons contacted in the course of the investigation.

This will include the investigator notifying those who are the subject of the allegations of the particulars of the allegations relating to them and providing them with a reasonable

opportunity to respond to the allegations.

The length of time required for the conduct of an investigation will be determined by the scope and nature of the allegations in the disclosure. However, the investigation will be pursued as expeditiously as is reasonable in the particular circumstances of the matter.

MNDA may not be able to undertake an investigation of a disclosure if it is not able to contact the discloser.

Keeping a discloser informed

A discloser will be provided with regular updates in relation to the action being taken in response to the disclosure if the discloser can be contacted (including through anonymous channels). Such updates would advise for example if an investigation has been commenced and if an investigation had been completed.

How the investigation findings will be documented, reported internally, and communicated to the discloser

Throughout the course of the investigation, relevant information (conversations, interviews, communications), and relevant documents will be recorded by the investigator and securely stored. If the investigator is an external investigator engaged by MNDA, the investigator will provide all material gathered during the investigation to the CEO or the Chair of the Board at the time the investigator submits their written report.

The investigation report will include:

- the allegations made by the discloser;
- a description of the relevant material gathered during the investigation
- an assessment and evaluation of the relevant material and the findings of fact that are substantiated by that material;
- whether the allegations have been substantiated and if so, the material that supports that conclusion
- recommendations for actions to be taken to address any operational or systemic issues identified during the investigation.

All documents relating to the investigation will be kept securely and confidentially, and access to documents granted only by the CEO or the Chair of the Board.

Disclosers will receive information on the outcome of their disclosure at the end of the investigation or at the conclusion of other action taken to address the disclosure. This does not include the discloser being provided with a copy of the investigation report.

11. Ensuring fair treatment of individuals mentioned in a disclosure

MNDA will ensure the fair treatment of any MNDA employees, who are mentioned in a disclosure that qualifies for protection, including those who are the subject of an allegation in a disclosure:

- disclosures will be handled as confidentially as is consistent with the taking of appropriate action to address the disclosure. For example, it is not always possible to retain confidentiality during the conduct of an investigation. Each disclosure will be seriously considered and assessed to determine the appropriate way of dealing with it
- if an investigation needs to be undertaken, the rules of natural justice and procedural fairness will be observed by the investigator. Care will be taken to ensure that there is no apprehension of bias in the conduct of the investigation. A qualified external independent investigator instructed by the Chair of the Board will be engaged to conduct any investigation of an allegation concerning the CEO or a Director of the Board.
- an employee who is the subject of a disclosure or is referred to in a disclosure may contact MNDA's Employee Assistance Program for confidential support.

12. Accessibility of this policy

Within the organisation

This policy will be made available to all employees, volunteers, and Board Directors of MNDA.

This policy will be accessible and will be communicated in the following ways:

- posting the policy on the staff SharePoint drive and notifying staff of its availability.
- making the policy publicly available on the MNDA website; and
- incorporating the policy in employee induction information packs and training for new starters.

Awareness and education

MNDA will inform and educate our employees about this policy, procedures for reporting, and the protections available to them in order to facilitate a safe environment in which concerns of misconduct or wrongdoing may be voiced without reprisal.

Staff involved in the management of whistleblower reports will receive appropriate training.

Outside the organisation

To ensure that disclosers outside the organisation can access MNDA's whistleblower protection policy, the policy will be available on MNDA's external website.

13. Reviewing and updating this policy

MNDA will review its whistleblower policy, processes, and procedures every year, ensuring that they reflect current legal and corporate governance requirements.

Any substantive changes made to the policy will be communicated to all employees.

The policy will be published on MNDA's website.