



# Whistleblower (Board policy)

## Policy | BM4

### Our commitment

At Goodstart, we're committed to maintaining the highest standards of ethical behaviour across all areas of our organisation. We know that the people who work with us, provide services, or interact with us are often the first to notice when something might be wrong.

If you see something that doesn't feel right, we encourage you to speak up. We understand that speaking up can be difficult, but we're committed to supporting and protecting you throughout the entire process.

### Who this Policy applies to

This Policy applies to everyone involved with Goodstart who may notice something isn't right. This includes current and former staff, directors, contractors, consultants, service providers, their employees, and your family members (like spouses or dependents).

### When should you speak up

We know it's not always easy to speak up, but we encourage you to report it if you see or have reasonable grounds to suspect anything that could harm Goodstart, its people, or its reputation. This could include:

- Dishonest or fraudulent behaviour (like falsifying records)
- Anything illegal, unethical or harmful (like drug use, violence, or abuse)
- Breaches of employment, labour or workplace health and safety laws;
- Actions that could damage our reputation or relationships
- Serious breaches of workplace policies (like the Code of Conduct)
- Serious risks to public safety
- Any other behaviour that could lead to significant loss or harm.

### Human rights concerns

If you're aware of any issues related to human rights (such as human trafficking, forced labour, or child labour), we take these matters seriously and urge you to report them.

### Personal work-related grievance concerns

If the issue you're facing is more personal—like a work performance issue or an interpersonal conflict—this Policy doesn't cover it. For these types of concerns, please refer to Goodstart's Employee Grievance and Complaints Handling Procedure.

### How to speak up

If something feels off to you, there are a few ways you can report it. You can contact our independent disclosure hotline, **Your Call**:



**Web** <http://www.yourcall.com.au/goodstart>



**Phone** 1300 790 228 (Monday to Friday, 7.00am to 12.00am AEST)

**Hearing or speech impairments services:** Available through [relayservice.gov.au](http://relayservice.gov.au).

**Translation services:** Available through the Translating and Interpreting Service at 131 450

You can also report your concerns to one of the Eligible Recipients listed on page 5. Legal protections are available for those who speak up, but to qualify for these protections, you will need to disclose your concerns either to Your Call or an Eligible Recipient. If you would like more information about this Policy before making a disclosure, we encourage you to contact a Whistleblower Protection Officer listed on page 3.

<b>DOCUMENT NUMBER &amp; TITLE</b>		BM4 Whistleblower Policy	
<b>CONTENT OWNER</b>	Goodstart Board	<b>DOCUMENT AUTHOR</b>	Company Secretary & General Counsel
<b>DATE PUBLISHED</b>	11/03/2025	<b>DOCUMENT VERSION</b>	V14.1
		<b>REVISION DUE DATE</b>	28/02/2026

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## How we protect you

We are committed to protecting you throughout the entire process when you speak up. We'll do this by:

**Protecting your identity and maintaining confidentiality**

We won't share your identity or any information that could reveal your identity unless you give us consent or it's required by law. We will always ask for your consent before disclosing any details to another party.

You can choose to stay anonymous or reveal your identity when speaking up. If you prefer to stay anonymous, we encourage you to submit your report through our independent disclosure hotline, Your Call. If you provide your name and contact details, they won't be visible to anyone at Goodstart.

**Protecting you from detriment**

We're committed to ensuring you're not treated unfairly or discriminated against for speaking up. You will not suffer any disadvantage, like job loss or retaliation, as a result of raising your concerns.

We will assess your report and take all reasonable steps to investigate and resolve the issues raised, ensuring fairness to everyone involved.

**Protecting you from liability**

You will be protected from civil, criminal, and/or administrative liability (including disciplinary action) for speaking up, unless the disclosure is knowingly false or misleading.<sup>1</sup>

**Providing you with support**

We're here to support you throughout the process. Our Whistleblower Protection Officer will work with you to ensure all aspects of this Policy are followed.

We also offer staff confidential and independent counseling through our Employee Assistance Program, managed by Telus Health. Employees can call 1300 361 008, with services available 24 hours a day, 7 days a week.

## The investigation process

Once you report an issue, the Eligible Recipient will inform you of your rights around confidentiality and protection and will gather as much information as possible. All information will be documented and stored securely to ensure confidentiality and to protect your identity.

The matter will then be referred to a Whistleblower Protection Officer, who will assess your report, determine whether it fits within this Policy, and decide what action should be taken. If the matter involves a Whistleblower Protection Officer or a member of the Goodstart Leadership Team, it will be referred to the Board Chair and Deputy Chair.

Your identity will only be shared with the Whistleblower Protection Officer or Board member (as applicable) if you give consent. If you choose to stay anonymous, the Eligible Recipient will communicate with the Whistleblower Protection Officer or Board member on your behalf throughout the investigation.

Goodstart's response to a disclosure will depend on the situation. If an investigation is carried out, it will be done within a reasonable timeframe. All parties involved will be required to follow a fair and objective process, ensuring confidentiality and protections.

If the investigator knows your identity, they won't share it without your permission and will take reasonable steps to minimise the risk of your identity being revealed. Where appropriate, you may be provided with feedback on the progress and outcome of the investigation. Any investigation reports will however remain the property of Goodstart and will not be shared.

Reports relating to whistleblower disclosures will be provided to the Board Finance, Audit, and Risk Committee. While the method of documenting and reporting findings may vary depending on the nature of the disclosure, any reporting will maintain confidentiality requirements.

<sup>1</sup> If you're involved in the wrongdoing that you are reporting, making a report may not shield you from liability for your actions.

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Disclosures outside the scope of this Policy may be referred to other business units or people for appropriate action.

### If someone is named in your report

If your report mentions someone else, that person will be treated fairly and supported throughout the process. They will have the chance to respond to the concerns raised. We will ensure that the investigation is handled as confidentially as possible.

### External reports

While we encourage you to report internally, you also have the option to report externally to government organisations like ASIC, ATO, or the Tax Practitioner Board. These organisations provide further details about when and how a whistleblower may make a report on their websites. You can also seek legal advice if you're unsure about your disclosure or the protections provided to you when speaking up.

You may be eligible to make a Public Interest Disclosure or Emergency Disclosure under certain circumstances and qualify for legal protections. Goodstart encourages you to seek independent legal advice before making such a disclosure to fully understand the criteria for protection under the relevant legislation.

### False reports

If someone knowingly makes a false report, we take this seriously, and they may face consequences, including potential disciplinary action.

### Accessibility

This Policy is available on our website and intranet, and it's included in our induction and annual training to make sure everyone knows how to use it.

## Responsibilities

<b>Goodstart Board</b>	Monitors the effectiveness of this policy and reviews investigation reports to address broader trends, themes and/or emerging risks highlighted by speak up disclosures.
<b>Chief Executive Officer</b>	Ensures systems and processes are in place to support this Policy.
<b>Whistleblowing Protection Officers</b>	Safeguards individuals who speak up, appoints investigators, assesses reports, monitors and reports on the effectiveness of this Policy, and provides the Goodstart Board with periodic reporting on speak up disclosures. This role has direct, unfettered access to independent financial, legal and operational advisers as required, and a direct line of reporting to the Chief Executive Officer or any senior management team member or Board member, as may be required.
<b>Eligible Recipients</b>	Receives and refers speak up disclosures to Whistleblowing Protection Officers promptly, ensuring protections are maintained throughout all stages of the process.
<b>All Employees and Contractors</b>	Maintains high ethical standards and report concerns when you see them.

## Whistleblowing contacts

<b>Whistleblower</b>	<b>Gavin Bartlett</b> , General Counsel: email <a href="mailto:gbartlett@goodstart.org.au">gbartlett@goodstart.org.au</a>
<b>Protection Officers</b>	<b>Nadine Fiers</b> , Company Secretary: email <a href="mailto:nfiers@goodstart.org.au">nfiers@goodstart.org.au</a>

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