

## Whistleblower Policy

### Introduction

Kramer Ausenco's policies, principles and values have been developed to ensure high standards of conduct and ethical behaviour in all our business activities globally.

This Anonymous Whistleblower Policy is to ensure that our employees, agents, vendors, contractors and customers can raise concerns regarding actual or suspected contravention of our ethical and legal standards without fear of reprisal.

This policy aims to:

- Encourage people to report an issue if they genuinely believe that someone has contravened our policies, principals, values, standards, or the law
- Outline how Kramer Ausenco will deal with all reported misconduct or unethical behaviour
- Assist in ensuring that serious misconduct or unethical behaviour is identified, investigated (if necessary) and dealt with appropriately.

### Who does this Policy apply to?

This policy applies to all people and representatives of the Kramer Ausenco group of companies, including directors, officers, employees, contractors, and agents, whether full-time, part-time, or casual at any level of seniority wherever employed or engaged.

### What sort of concerns should be reported?

All personnel are encouraged to report any genuine matters or behaviour that they honestly believe contravenes Kramer Ausenco policies, principles, values, standards, or the law. For the purposes of making a report under this policy, matters may include any actual or suspected:

- corrupt activities, such as offering or accepting bribes, kick-backs or inducements;
- theft, fraud or misappropriation;
- significant mismanagement or waste of funds or resources;
- any alleged incidents of sexual exploitation, sexual abuse, sexual harassment, transactional sex, or fraternisation;
- serious harm to employees, public health, safety or the environment;
- conduct or practices which are illegal or breach any law;
- irregular accounting practices;
- workplace harassment, violence, and inappropriate behaviour; and
- quality concerns.

The matter must be serious enough that it would, if proven, constitute:

- a criminal offence;
- reasonable grounds for dismissing, or otherwise terminating the services of any employee, contractor representative or agent; or
- reasonable grounds for significant disciplinary action.

### Reporting an incident/matter

If you become aware of any matter or behaviour that you think contravenes Kramer Ausenco's Principles of Ethics and Fairness, other policies, or the law, then you should discuss the matter with your supervisor.

If you are not comfortable discussing the matter with your supervisor, or don't believe that your concerns will be taken seriously, then you should engage the **Anonymous Whistleblower "Alertline"** and raise your concern in accordance with the procedure outlined below.

The "Alertline" is maintained 24 hours a day, 7 days a week, 365 days a year by a 3rd party independent of Kramer Ausenco. You can contact the "Alertline" by either telephone through a toll-free telephone service (details at the end of this policy) or online at [www.Ausenco.alertline.com](http://www.Ausenco.alertline.com).

By utilising an independent 3rd party to host the "Alertline", your identity, the fact that you have made a report and the contents of that submission are anonymous and confidential. Unless you choose to have your identity known, it will not be possible for anyone within Kramer Ausenco to obtain that information from our service provider.

### Making a report via the toll-free hotline

Through a toll-free telephone service in Australia 1-800-551-155 (Optus) or 1-800-881-011 (Telstra), PNG 001 704-526-1143.

All other Pacific offices are directed to the web site: [www.Ausenco.alertline.com](http://www.Ausenco.alertline.com).

### What happens after a report is made?

A summary, excluding the reporter's identifying details, of all submissions submitted through the Anonymous Whistleblower "Alertline" are forwarded to the company's Company Secretary.

We will investigate all reported concerns and will, where applicable, provide feedback regarding the investigation's outcome. We will take the necessary course of action in response to all submissions. Your identity (if you have disclosed it) and the facts of the report will only be disclosed to those that are actively involved in investigating the matters raised.

### What happens to whistleblowers?

Under no circumstances will the report of such information that the employee reasonably believes to be factual and is made in good faith be the basis for retaliatory action against the employee making the report. This is not an amnesty provision. If an individual who files a report is later discovered to have actively participated in activities that violate this program and / or the Kramer Ausenco Code of Conduct, or to have filed a false report, they will be subject to appropriate disciplinary action.

Whistleblowing is not about airing grievances. It's about reporting breaches of Kramer Ausenco's Principles of Ethics and Fairness, other policies or the law. A false or inaccurate report can damage the career prospects and reputation of people who are the subject of unfounded allegations. If your report is not made in good faith or is found to be malicious, deliberately misleading or frivolous, you may be subject to disciplinary action, to the extent your identity can be determined.



**Frank Kramer**  
Chief Executive Officer

