



WHISTLEBLOWER POLICY
Policy Document



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1. PURPOSE

This policy sets out how MISCO Australia encourages, protects, and manages the disclosure of information about misconduct, unethical behaviour, or breaches of the law.

Its purpose is to ensure that individuals feel safe to speak up without fear of reprisal, consistent with MISCO's values of integrity, transparency, and accountability.

2. POLICY STATEMENT

MISCO Australia is committed to maintaining a culture of honesty and ethical conduct.

We value the courage of individuals who raise genuine concerns and are committed to protecting whistleblowers from victimisation or retaliation. All reports will be handled confidentially, investigated fairly, and acted upon promptly in accordance with this policy and applicable law.

3. OBJECTIVES

- Provide a clear framework for reporting misconduct or wrongdoing.
- Encourage employees and others to speak up about unethical or illegal behaviour.
- Protect whistleblowers from victimisation, dismissal, or discrimination.
- Ensure all disclosures are properly investigated and managed.
- Promote compliance with the Corporations Act 2001 (Cth) and other relevant laws.

4. SCOPE

This policy applies to:

- All directors, employees, contractors, and consultants of MISCO Australia.
- Suppliers, service providers, and their employees.
- Former employees or associates who wish to make a protected disclosure.

It covers information relating to:

- Misconduct or improper state of affairs in relation to MISCO;
- Breaches of legislation, company policy, or ethical standards;
- Dishonest, corrupt, fraudulent, or unsafe behaviour;
- Discrimination, harassment, or bullying;
- Environmental or safety breaches;
- Concealment or deliberate cover-up of any of the above.

5. WHO CAN MAKE A DISCLOSURE

Eligible whistleblowers include:

- Current or former MISCO employees (full-time, part-time, or casual);
- Contractors, suppliers, consultants, or their employees;
- Relatives or dependents of any of the above.

6. PROTECTED DISCLOSURES

A disclosure is protected under the Corporations Act if it:

- Concerns misconduct, an improper state of affairs, or a breach of law;
- Is made by an eligible whistleblower; and
- Is made to an eligible recipient.

Protected disclosures may be made anonymously, and protection still applies.

7. ELIGIBLE RECIPIENTS

Protected disclosures can be made to:

- A MISCO Director;
- A Manager or Supervisor;
- The IMS Coordinator (for internal governance issues); or
- External authorities such as:
 - The Australian Securities and Investments Commission (ASIC);
 - The Australian Prudential Regulation Authority (APRA); or
 - A legal practitioner for the purpose of obtaining advice.

8. HOW TO MAKE A DISCLOSURE

Disclosures can be made in any of the following ways:

In Writing:

To: The Directors – MISCO Australia Pty Ltd

Address: 89–91 Licola Crescent, Dandenong South VIC 3175

By Email:

info@misco.net.au (attention: Whistleblower Disclosure – Confidential)

In Person:

By appointment with a Director or Manager.

Anonymous disclosures are accepted and will be investigated to the extent practicable.

9. CONFIDENTIALITY AND PROTECTION

- The identity of a whistleblower will remain confidential unless required by law.
- Information that could identify the whistleblower will not be disclosed without consent.
- All records will be securely stored and only accessible to authorised personnel.
- Whistleblowers will not suffer retaliation, demotion, dismissal, or discrimination for making a disclosure in good faith.

Any act of retaliation or victimization will result in disciplinary action, including possible termination.

10. INVESTIGATION PROCESS

1. Receipt of Disclosure: The disclosure will be acknowledged (if contactable) within five (5) business days.
2. Assessment: The Directors or appointed officer will assess whether the disclosure qualifies for protection and requires investigation.
3. Investigation: A fair, independent, and confidential investigation will be conducted.
4. Outcome: Findings will be reviewed by Directors, and appropriate corrective actions implemented.
5. Feedback: The whistleblower may receive updates on progress, where appropriate and lawful.

11. FALSE OR MALICIOUS DISCLOSURES

Disclosures made in bad faith or with intent to cause harm may result in disciplinary action.

However, no action will be taken against a whistleblower who makes an honest disclosure, even if the allegation is later unsubstantiated.

12. SUPPORT AND PROTECTION

Whistleblowers may access:

- Employee Assistance Program (if available);
- Confidential meetings with management; or
- Referral to external legal or professional support.

MISCO Australia is committed to ensuring no employee suffers detriment for speaking up in good faith.

13. RESPONSIBILITIES

Role	Responsibilities
Directors	Oversee implementation, ensure compliance with legislation, and maintain confidentiality of disclosures.
Managers/Supervisors	Promote awareness, receive and escalate disclosures, and protect staff from retaliation.
Employees & Contractors	Report suspected wrongdoing promptly and cooperate with investigations.
IMS Coordinator / HR	Maintain secure records and assist with procedural compliance.

14. RECORD KEEPING

All disclosures and investigations will be recorded in the Whistleblower Register maintained by the Directors or IMS Coordinator.

Records will include date, summary, findings, and corrective actions.

All information will be stored securely in compliance with the Privacy Act 1988 (Cth).

15. TRAINING AND COMMUNICATION

- All employees receive training on this policy at induction.
- Refresher sessions will be conducted periodically.
- Managers and supervisors will receive additional guidance on handling disclosures.

16. REVIEW AND CONTINUOUS IMPROVEMENT

This policy will be reviewed at least every two (2) years or following significant legislative or operational changes.

17. RELATED DOCUMENTS

- Code of Conduct & Business Ethics
- Anti-Bribery and Corruption Policy
- Conflict of Interest Policy
- Corporate Governance & Integrity Policy
- Privacy Policy
- Disciplinary Procedure

18. ACKNOWLEDGEMENT

All MISCO employees, contractors, and representatives must acknowledge that they:

- Have read and understood this policy;
- Understand their right to report wrongdoing; and
- Are aware of the protections available under this policy.

Approved By:

Rhiannon Frankas – Director

Daniel Frankas – Director

Date: 11.10.2025



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