Whistleblower Protection Policy

1. Purpose

Perth Airport and its related parties (PAPL) are committed to fostering a culture of integrity, corporate compliance, ethical behaviour and good corporate governance.

PAPL recognises the value of transparency and accountability to its risk management and corporate governance frameworks and supports the reporting of improper conduct.

PAPL is committed to the protection of individuals who disclose information about illegal or improper conduct occurring within PAPL.

This Policy has been adopted to provide a safe and confidential environment where such concerns can be raised by a whistleblower without fear of reprisal or recrimination.

This Policy sets out:

- Who is entitled to protection as a whistleblower under this Policy.
- What types of matters are disclosable under this Policy.
- The protections whistleblowers are entitled to.
- How disclosures made by whistleblowers in accordance with this Policy will be handled appropriately and on a timely basis.

This Policy applies to everyone described in section 2, not only current employees. It is available on PAPL's intranet and website.

2. Who can make a disclosure under this Policy?

Disclosures can be made by an individual who is a current or former:

- officer or employee of PAPL;
- contractor or supplier of goods and services to PAPL (whether paid or unpaid), or their current or former employee; or
- associate of PAPL.

Disclosures can also be made by a relative, dependant or spouse of any of the individuals above, or by a dependant of their spouse.

3. What should be reported under this Policy?

This Policy is designed to complement normal reporting and communication channels between managers and employees. Employees are encouraged to continue raising issues at any time with their managers and are encouraged to make every attempt to report and resolve issues internally.

If you have seen or have reasonable grounds to suspect misconduct or have reasonable grounds to suspect an improper state of affairs or circumstances concerning PAPL, you are encouraged to report it.
For the report to be protected, you must have reasonable ground to suspect that the information you are reporting:

- is about misconduct or an improper state of affairs circumstances concerning PAPL;
- is a breach of, or is an offence against, the Corporations Act 2001 (Cth), the Australian Securities & Investments Commission Act 2001 (Cth), the Banking Act 1959 (Cth), the Financial Sector (Collection of Data) Act 2001 (Cth), the Insurance Act 1973 (Cth), the Life Insurance Act 1995 (Cth), the National Consumer Credit Protection Act 2009 (Cth), or the Superannuation Industry (Supervision) Act 1993 (Cth), or regulations made under those laws;
- is an offence against any other Commonwealth law that is punishable by imprisonment of 12 months or more; or
- indicates a significant risk to public safety or the stability of, or confidence in, the financial system, even if it does not involve breach of a particular law,

In this Policy, these types of conduct are referred to as “Disclosable Matters”.

Examples of the types of conduct that could be Disclosable Matters include actions or behaviour in relation to PAPL that you genuinely believe may:

- Be dishonest, corrupt or illegal.
- Involve theft, fraud or misappropriation.
- Involve damage/sabotage, violence or drug and alcohol sale/use.
- Impose risks to the health and safety of employees or the public.
- Be inappropriate or unethical conduct.
- Involve the misuse of information.
- Be a wilful or serious breach of an internal policy or code (such as PAPL’s Code of Conduct).
- Constitute an offence against or a contravention of laws including the Corporations Act 2001 (Cth).
- Be a serious and substantial waste of PAPL resources.
- Victimise someone for reporting improper conduct under this Policy.
- Cause substantial financial or non-financial loss or detriment to PAPL.
- Be conduct which may cause damage to PAPL’s reputation.
- Represent a danger to the public or the financial system.
- Be adverse action or a threat to take adverse action against a person who has made, or may make, a report under this Policy.

4. What should be dealt with under the PAPL Grievance Management Procedure?

Generally, personal work-related grievances are not considered a Disclosable Matter under this Policy and should be reported through the Grievance Management Procedure. Personal work-related grievances relate to issues which have or tend to have implications for you personally in connection with your employment and that do not have serious implications for PAPL or the public and do not involve a breach of corporate regulatory legislation including the Corporations Act. These matters do not qualify for protection under the Corporations Act, however may be protected under other legislation such as the Fair Work Act 2009.

Examples include the following:

- An interpersonal conflict between you and another employee.
- A decision relating to your employment or a transfer or promotion.
- A decision relating to the terms and conditions of your employment including your remuneration.
- A complaint of bullying, harassment, discrimination or other unfair treatment.
- A decision to suspend or terminate your employment or disciplinary action taken against you.

There may be some instances where a personal work-related grievance also has significant implications for PAPL, for example, if they are part of a problematic pattern or systemic issue within the organisation, or if the grievance is bundled with illegal activity or another protected disclosure.

5. How do I report a Disclosable Matter?

There are a number of ways to report Disclosable Matters to ensure the protection in this Policy applies.

To ensure appropriate escalation and timely investigation of matters under this Policy, PAPL encourages reports to be made to the Company Secretary or to Your Call as outlined in sections 5.1 and 5.2. Reports can be made in writing, verbally or over the phone.

You can opt to remain anonymous if you wish and still be protected under this Policy and the Corporations Act. However, PAPL encourages you to disclose your identity so that we can better monitor your wellbeing and implement measures to protect you against detrimental conduct. Knowing your identity will also help PAPL conduct an effective investigation.

If you need information and advice about making a disclosure or the support and protection available, you may discuss the matter in confidence with Company Secretary. Note: in the event you do not formally make a disclosure PAPL may nevertheless be compelled to act on the information provided during the discussion if the information reasonably suggests misconduct has or may occur.

You may also choose to seek legal advice if you are unsure what protections apply to you. You may also contact ASIC for further information, but ASIC will only be able to provide you with general guidance.

5.1 Internal reporting process

Reports of Disclosable Matters may be made directly to the Company Secretary in person, in writing, verbally, via email (governance@perthairport.com.au) or over the phone. You may choose to remain anonymous.

5.2 External reporting process

If you are not comfortable or able to report Disclosable Matters internally, you may report it to PAPL's external and independent disclosure management service provider.

PAPL has contracted Your Call Disclosure Management Services ('Your Call') to receive and manage your report with impartiality and confidentially.

This option allows you to:

- Remain completely anonymous.
- Identify yourself to Your Call only.
- Identify yourself to both Your Call and PAPL.

The Your Call reporting options include:
Website: https://www.yourcall.com.au/perthairport
Telephone: 1300 790 228.

Online reports can be made via the website address listed above. You may upload any relevant documentation and/or material that you wish to provide.

Your Call is also available via telephone between 9am and 12am, Monday to Friday AEST excluding national public holidays.

5.3 Alternative reporting process

Alternatively, you can make a disclosure to any one of the following:

a) an officer or senior manager within PAPL;

b) an auditor or member of an audit team conducting an audit on PAPL; or

c) if the disclosure concerns PAPL's tax affairs, PAPL's registered tax agent or BAS agent, or an employee or officer at PAPL who has functions or duties relating to its tax affairs and who you consider may be assisted in their role by knowing that information.

If you are a person referred to above and you receive a report of a Disclosable Matter outside of the 5.1 or 5.2, you must consider whether the disclosure could put the eligible whistleblower at risk of personal disadvantage. You must maintain confidentiality and contact the Company Secretary for guidance, without disclosing the whistleblower's identity (or information likely to identify them) unless they have consented. There is also a guidance note contained on the intranet on the governance site.

5.4 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 are protected (even in the event the legal practitioner concludes that a disclosure does not relate to a 'Disclosable Matter').

5.5 Regulatory bodies and other external parties

Disclosures of information relating to Disclosable Matters can be made to the Australian Securities & Investment Commission, Australian Prudential Regulation Authority or another Commonwealth body prescribed by regulation and qualify for protection under the Corporations Act: see s1317AA(1). Disclosures of information in relation to PAPL's tax affairs can be made to the Commissioner of Taxation.

5.6 Public interest disclosures and emergency disclosures

Disclosures can be made to a journalist or parliamentarian under certain circumstances and qualify for protection under the Corporations Act: see s1317AAD.

You should seek independent legal advice to ensure you understand the criteria for making a public interest or emergency disclosure that qualifies for protection.

6. When should I report a Disclosable Matter?

Generally, you are encouraged to make a report as early as possible. PAPL does not expect that you are an expert on the law and does not encourage you to conduct your own investigation.

The law provides that you must have "reasonable grounds" for the disclosure for the whistleblowing protections to apply. You do not need to prove your allegation; however, you are encouraged to provide evidence if safely available. A person making a disclosure can still qualify for whistleblower protection if their disclosure turns out to be incorrect. However, fabricated disclosures are a form of misconduct.

7. What happens after I report a Disclosable Matter?

Reports made under this Policy will be taken seriously. If a report is made to Your Call, they will refer the matter, with a copy of any relevant document or record provided by you, to the Company Secretary within one business day. Your Call may require further information from you to clarify the report or to ensure that the anonymity requested by you is not compromised before referring the matter to PAPL.

7.1 Investigation process

Upon receipt of a report, the Company Secretary will determine whether the conduct is a Disclosable Matter under this Policy or whether the matter is a personal work-related grievance. A personal work-related grievance will be dealt with via PAPL's Grievance Management Policy.

If the conduct is a Disclosable Matter, the Company Secretary may choose to handle the issue independently. Alternatively, the Company Secretary may involve others to investigate and handle the issue if an in-depth investigation is required. Such a group is known as a 'Review Team' and may include, for example, People and Culture, Legal or third-party services providers.

The Review Team will decide whether to commence an investigation into the disclosure to determine whether there is enough evidence to substantiate or refute the matters reported. The Review Team may seek further information from you, Your Call or other persons in the course of the investigation but will take reasonable steps to reduce the risk that you could be identified (if you choose to remain anonymous or for your identity to remain confidential).

The investigation will be conducted in a timely, thorough, objective, independent and fair manner, and will be reasonable and appropriate, having regard to the nature of the alleged Disclosable Matter, the principles of natural justice and procedural fairness.

The outcome of an investigation will depend on the nature of the disclosure and could involve liaising with external investigators or subject matter experts. In extreme circumstances, PAPL may contact the police, corporate regulators or industry accreditation bodies.

Subject to confidentiality obligations, the CEO and the Remuneration and Appointments Committee of PAPL's Board of Directors will be apprised of disclosures, investigations and other actions taken pursuant to this Policy. The Company Secretary will also report particulars of an investigation to the relevant agency when required to do so under any relevant State or Commonwealth law, regulation or rule.

7.2 Commitment to keep whistleblowers informed

Subject to the considerations of privacy of those against whom the allegations are made and customary practices of confidentiality, you will be kept informed of:

- the commencement of an investigation (if required);
- relevant progress and outcome of an investigation;
- the action taken to address any Disclosable Matter that has been proven; and
- the decisions made by PAPL about the matter.

We ask that you keep communications about the investigation confidential. This does not prevent you from making a disclosure to a regulator, a legal practitioner or anyone else permitted under the Corporations Act.

8. What protection and support will I receive?

PAPL is committed to protecting and ensuring, to the greatest extent possible, that persons who disclose Disclosable Matters under this Policy or who could make disclosures under this Policy do not suffer any detrimental treatment.

Detrimental treatment includes dismissal, injury in the person's employment, alteration of duties, discrimination, harassment, intimidation, harm or injury (including psychological harm), damage to the person's property damage to the person's reputation, damage to a person's business or financial position or any other damage connected with making a report. Any such actual or threatened retaliatory action will be treated as serious misconduct and will be dealt with in accordance with PAPL's disciplinary procedures.

PAPL will take reasonable steps to ensure that whistleblowers are not subject to detriment as a result of making a report.

PAPL is committed to supporting you through this process and will protect you by:

- ensuring confidentiality in the investigation so far as is possible (see Section 9 for further detail);
- protecting, as far as legally possible, your identity;
- offering support to you through the employee assistance program, where relevant;
- offering a leave of absence while a matter is investigated, where this is reasonably required to protect you; and
- relocating you or other employees to a different work group or department, where this is reasonably required to protect you.

Some of these measures, such as the employee assistance program, are only available to PAPL employees.

8.1 Whistleblower Protection Officers

Where you make a disclosure under this Policy and your identity is known, PAPL will appoint a Whistleblower Protection Officer. The Whistleblower Protection Officer is a senior employee responsible for providing certain protections and support to individuals who are concerned that they may experience personal disadvantage as a result of making a disclosure.

If you believe you have been a victim of detrimental treatment by reason of your status as a whistleblower or because someone thinks that you might make or could make a disclosure under this Policy, you should immediately report the matter to a PAPL Whistleblower Protection Officer, either through the Company Secretary or through Your Call.

You may also seek independent legal advice or contact regulatory bodies, such as ASIC, APRA or the ATO, if you believe you have suffered detriment.

Where reprisals are taken or are claimed to have been taken against a whistleblower, the whistleblower may appeal to the CEO or an independent mediator or arbitrator appointed by the CEO, if the matter cannot be resolved internally.

8.2 Civil liability

If you are a whistleblower, you are protected from some civil, criminal or administrative action being taken against you because you have made a report under this Policy. This includes civil action being taken against you for breaching your employment contract, criminal action being taken against you (except because you have made a false report) or administrative action (eg disciplinary action) being taken against you. However, these protections do not grant immunity for any misconduct you have engaged in that is revealed in your disclosure.

The same applies to anyone assisting in an investigation. However, we will take your disclosure and cooperation with the investigation into consideration when determining disciplinary or other actions.

Your identity as a whistleblower may also be protected in a court proceeding. You may also seek compensation if you suffer detrimental conduct.

9. How does PAPL protect confidentiality?

Information received under this Policy will be held in the strictest confidence and will only be disclosed to the appropriate persons within PAPL to the extent necessary to investigate the disclosure and take appropriate action.

PAPL understands that you may be worried about possible reprisals from making a disclosure. You can choose to remain anonymous when making a disclosure, over the course of an investigation into the disclosure or after the investigation is finalised. You may also refuse to answer questions that may reveal your identity. If you choose to remain anonymous, you are encouraged to maintain ongoing two-way communication with PAPL. PAPL encourages you to disclose your identity as this will help monitor your wellbeing and protect you against personal disadvantage.

If you choose to disclose your identity, the only people who will know your details are the Company Secretary, the Review Team and the Whistleblower Protection Officer, and Your Call (if you have made the disclosure to Your Call).

Your identity will not be disclosed to anyone else unless:

- it is disclosed to ASIC, APRA, a member of the Australian Federal Police or (for tax matters) the Commissioner of Taxation;
- it is disclosed to a legal practitioner to obtain legal advice or representation about the whistleblower provisions of the Corporations Act;
- it is disclosed to another person or body prescribed by regulation;
- you consent to the disclosure; or
- it is otherwise permitted or required by law.

In these circumstances the Review Team will inform you as soon as possible and work with you to minimise the impact of the loss of confidentiality.

All information received from you, as well as the fact that you have made a disclosure and any record produced as part of an investigation, is held securely with access restricted to those persons required to access the records for the purpose of this Policy.

10. Consequences of making false reports

The effectiveness of this Policy rests in high ethical standards from all stakeholders. If you make a false disclosure you will not be protected under this Policy and may be subject to disciplinary action (including dismissal) or legal action.

11. Where is this Policy published?

This Policy is published internally on PAPL's intranet to inform current employees and directors. It is also published on PAPL's public website to guide former employees and other individuals identified in section 2 above. Training and education will be provided to current officers and employees.

12. Roles and responsibilities

12.1 Employees

All Employees are responsible for the following:

- Act in accordance with PAPL's Code of Conduct.
- Remain alert to any Disclosable Matters in the workplace.
- Report known or suspected Disclosable Matters in accordance with this Policy.
- Support whistleblowers who have reported Disclosable Matters.
- Assist in investigations.
- Refrain from any activity that is or could be perceived to be victimisation of a whistleblower.
- Protect and maintain the confidentiality of a whistleblower they know or suspect to have reported Disclosable Matters.

12.2 Your Call Protected Disclosure Coordinator

The Protected Disclosure Coordinator, nominated by Your Call, is responsible for liaising between PAPL and the whistleblower, and will do the following:

- If appropriate and permissible, inform the whistleblower of the progress of the matter.
- Establish and manage a confidential record management system.

12.3 Your Call Protected Disclosure Officers

The Protected Disclosure Officers are nominated by Your Call, who will do the following:

- Receive reports of Disclosable Matters made to Your Call.
- Impartially assess and clarify the information, if necessary to do so.
- Take steps to ensure the identity of the whistleblower is kept confidential and anonymity maintained if sought.
- Provide the whistleblower with access to the Your Call message board to enable the whistleblower to remain anonymous if desired, and to post questions and information on-line for the attention of PAPL.
- Forward reports of Disclosable Matters and supporting evidence to the Protected Disclosure Coordinator as the go between with PAPL.

12.4 Company Secretary

The Company Secretary has been nominated by PAPL to liaise between PAPL and Your Call, and will do the following:

- Receive the report of Disclosable Matters from Your Call or directly from the whistleblower.
- Determine the appropriate process for dealing with the report of Disclosable Matters.
- Establish and maintain a confidential filing system.
- Be responsible for carrying out, or forming a Review Team to carry out, an investigation.
- Advise the whistleblower (through Your Call where anonymity has been sought) of the progress of the matter when permissible and appropriate to do so.
- Take all necessary steps to ensure the identity of the whistleblower and the person/s who is the subject of the report of Disclosable Matters are kept confidential.
- Provide accurate and confidential advice or information to employees regarding this Policy (even if the employee does not want to make a disclosure)
- If the Company Secretary has a conflict in dealing with a report of Disclosable Matters the General Counsel (or another person appointed by the CEO) will undertake this role).

12.5 PAPL Whistleblower Protection Officer

The Whistleblower Protection Officer is appointed by PAPL to do the following:

- Provide information to potential whistle-blowers about this Policy before they make a disclosure.
- Safeguard the interests of the whistleblower (and any employee assisting in investigations) in terms of this Policy and any applicable legislation.
- Assess the immediate welfare and protection and support needs of a whistleblower and, where the whistleblower is an employee, seek to foster a supportive work environment.
- Advise the whistleblower of any legislative or administrative protections and support available to them.
- Respond as appropriate and necessary to any concerns or reports of victimisation.
- Attend to the general welfare of a whistleblower who has voluntarily disclosed their identity or whose identity has been disclosed by circumstance.
- Address any issues or concerns of victimisation.

PAPL may appoint a person from within the organisation to be the Whistleblower Protection Officer. Ordinarily, this role will be performed by the Chief Commercial & Aviation Officer; however, the CEO may appoint any other suitable senior employee where appropriate.

The Whistleblower Protection Officer will have direct access to independent advisors, if required.

13. Review of program

PAPL will review the operation of this Policy periodically to ensure that it meets its goals and remains effective.

Authority table

Authorised by	Board / REMCO
Document Owner	Company Secretary

Revision index

Version number	Date	Revised or reviewed by (Position title)	Revisions approved by (Position title)	Reasons and details of changes	Next review date
1	5/12/16	Company Secretary	REMCO	N/A	5/12/18
2	26/11/18	Company Secretary	N/A	No changes made	26/11/20
3	27/11/19	Company Secretary	Board	Changes made to comply with new laws.	27/11/21
4	29/10/21	Company Secretary	Company Secretary	Minor revisions made as suggested by Your Call and changes to position titles	29/10/23
5	13/9/23	Company Secretary	CEO	Minor changes to committee reporting of disclosures to make it mandatory	13/9/25
6	18/6/24	Company Secretary	Company Secretary	Change to position title	18/6/26
7	14/7/25	Company Secretary	Company Secretary	Change in procedure name to Grievance Management Procedure	14/7/27
8	10/2/2026	Company Secretary	Company Secretary	Minor change to WPO responsibilities	10/2/2028
9	10/11/2026	Company Secretary	Company Secretary	Direct link to disclosure form. Removal of Code.	10/11/2028