

# RESONANCE HEALTH LIMITED – WHISTLEBLOWER PROTECTION POLICY

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## WHISTLEBLOWER PROTECTION POLICY RESONANCE HEALTH LIMITED (“COMPANY”) ACN 006 762 492

### 1. Introduction

#### 1.1 Commitment

This Whistleblower Protection Policy (**‘Policy’**) has been adopted by the Board of Directors of the Company (“Board”) to ensure that concerns regarding unacceptable conduct including breaches of the Company's Code of Conduct can be raised on a confidential basis, without fear of reprisal, dismissal or discriminatory treatment.

#### 1.2 Purpose of this Policy

The purpose of this Policy is to promote responsible whistle blowing about issues where the interests of others, including the public, or of the organisation itself are at risk.

#### 1.3 Who is covered by this Policy?

This Policy applies to all Company personnel including the Company's; Directors, officers, employees, contractors (including subcontractors) and employees of contractors, joint venture partners (who have agreed to be bound by the Policy) and suppliers (each a “Company Person” and collectively “Company Personnel”).

### 2. Conduct Covered by this Policy

Company Personnel are encouraged to report any conduct which is related to:

- (a) dishonest behaviour, fraudulent activities, corrupt practices or illegal activities;
- (b) conduct endangering health and safety, or endangering the environment;
- (c) a suspected breach of the Code of Conduct; and
- (d) a breach of any Company policy, as detailed in the Corporate Policy Manual.

### 3. Reporting and Investigating Unacceptable Conduct

If a Company Person suspects that conduct such as that described in Section 2 above may have occurred, then they should contact one of the following authorised officers (“Authorised Officers”):

- (a) Company Secretary; or
- (b) Chief Executive Officer (“CEO”); or
- (c) Chair of the Board; or
- (d) Chair of the Audit and Risk Committee.

A Company Person can make a report by phoning (+61 8) 9286 5300.

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The Company Person making the complaint will have the option of either:

- (a) identifying themselves; or
- (b) remaining anonymous.

Upon receiving a complaint, the Authorised Officer will determine who will investigate the matter, and an internal report on the outcome of the investigation, including any recommended actions, will be prepared by, or on behalf of, the Authorised Officer.

## **4. Protecting Confidentiality and Privacy**

### **4.1 Confidentiality**

If a Company Person makes a report of unacceptable conduct under this Policy, and the Company Person's identity is apparent to the Company, the Company will make every reasonable endeavour to ensure that the person's identity is protected from disclosure. The Company will not disclose the Company Person's identity (other than to the professional advisors of an Authorised Officer, and only then if considered necessary by the Authorised Officer) unless:

- (a) the Company Person making the report consents to the disclosure;
- (b) the disclosure is required by law;
- (c) the disclosure is necessary to prevent or lessen a serious threat to a person's health or safety; or
- (d) it is necessary to protect or enforce the Company's legal rights or interests or to defend any claims.

### **4.2 Protecting the Company Person**

Company Persons who make complaints in good faith and without malice can rely on the protection afforded by this Policy. However, disciplinary action may be taken against any individual making malicious or vexatious allegations.

## **5. General Reporting on Whistleblower Activity**

The Company Secretary will prepare reports which contain a general summary of the number and type of incidents identified or complaints received through the Company's internal reporting processes, together with a description of the nature and results of any investigation conducted as a result of a reported incident or complaint. Additionally, in each instance, the reports shall describe the measures taken to protect the identity of the whistleblower (as described in Section 4).

These reports will be provided:

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- (a) to the Board at the end of any month where a report has been received by an Authorised Person from a Company Person (or at a frequency to be determined by Board from time to time); and
- (b) to the Audit and Risk Committee (or the Board until such time that the Audit and Risk Committee is established by the Board).

## **6. Review of this Policy**

The Company Secretary will use the reports provided under this Policy to monitor and review regularly the effectiveness of the whistleblower protection program described in this Policy.

The Board is responsible for reviewing this Policy to determine its appropriateness to the needs of the Company from time to time.

This Policy may be amended by resolution of the Board.

## **7. Who to contact**

Any questions relating to the interpretation of this Policy should be forwarded to the Company Secretary.