



Whistleblower Policy

Integrity is at the heart of Wire Industries' business operations. Our aim to conduct ourselves with the highest level of integrity in everything we do, including the way we deal with our sub-contractors, our suppliers, our customers and each other.

Having a transparent and clear whistleblower policy is essential for both good risk management and maintenance of a high standard of corporate governance. Significant consequences may occur if we do not meet the expectations outlined in this policy.

This policy applies to all Wire Industries' employees including directors, officers, full time, part-time, or casual employees, cadets, contractors, contingent workers and consultants globally, as well as others with a connection to the Wire Industries group of company such as associates, suppliers or service providers and their employees, or a relative or dependant or the spouse of any of these individuals.

Purpose and Protection

Wire Industries' Whistleblower Policy is our defence against corporate fraud and wrongdoing. We encourage our staff and external parties to speak up with confidence if they suspect someone's actions or Wire Industries processes are exposing us to risk - whether that is reputational, ethical, legal or regulatory. There are several ways in which staff can raise concerns and are set out further below. You may prefer to raise the issue on an anonymous basis, or be comfortable raising it on a named but confidential basis. When considering the concern and how to raise it, consider carefully the level of detail we need to fully investigate the issue and whether you wish to be informed of any remedial steps taken. Provided you raise a genuine concern under this Policy and have reasonable grounds to suspect misconduct or an improper state of affairs, you will not suffer any detrimental action, regardless whether or not your concern proves to be well-founded following the investigation. If any individual is harassed or otherwise victimised after raising a concern, Wire Industries will take appropriate action. Please also note that the Corporations Act provides important legal protection for eligible whistleblowers.

Reportable conduct or concerns under this policy

The types of issues that can be raised under this policy are:

- money laundering
- fraud, bribery or corruption
- breaches of our legal and regulatory obligations
- irregularities involving financial or accounting procedures
- any criminal offence, including theft of proprietary information or property
- conduct which is or may be in conflict with the Company's interests, such as involvement with a competitor
- dishonesty or other irregularities in dealing with customers, vendors and other business partners

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- illegal payments to government officials or companies
- conduct which endangers the health and safety of employees and others working for Wire Industries
- conduct that represents a danger to the public
- soliciting and/or receiving gifts, services or benefits from external parties in excess of \$100 that have not been declared
- providing advantage, or disadvantage as the case may be, in the awarding of consultant, sub- contract or supply agreements, or variations to the same, to procure personal gifts, service or benefits from external parties
- conduct that is considered to be a deliberate act that is not for the benefit of the company eg: active absenteeism including falsifying Medical or Annual Leave forms, deliberate noncompliance with reasonable instructions from authorised officers or the like. This list is not exhaustive. If you are not certain whether something is unethical, you are encouraged to raise the issue in any event. Please note that personal work-related grievances do not generally qualify as whistleblower events.

WhistleBlower - options for raising an issue

This Policy envisages a number of ways you can report a misconduct or concern:

1. Direct supervisor – where you feel comfortable raising concerns directly, please be assured that you can raise issues on a confidential basis with your supervisor
2. Senior management – you may also raise a concern with a member of senior management, such as a director or a state manager, who will escalate the issue as appropriate.
3. Local Regulator or relevant body – you can raise concerns direct with the relevant external regulatory authority where you feel that none of the above options will sufficiently address your concern.

What happens when you raise a whistleblowing event?

1. We will investigate
2. We will keep you informed
3. We will report our findings to you (to the extent permitted by law)
4. The Board of Directors will monitor the handling of all whistleblower complaints.

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Confidentiality and Zero Tolerance for retaliation

Those who raise a genuine concern under this Whistleblower Policy are not at risk of losing their job or suffering any form of retaliation as a result, even if they are genuinely mistaken. Wire Industries will not tolerate the harassment or victimisation of anyone who makes a disclosure where they have reasonable grounds to suspect misconduct or an improper state of affairs. We recognise that employees or external parties may want to raise a concern anonymously or in confidence. We will protect their identity and will not disclose it without their consent, unless allowed or required by law.

Your experience

This Policy is to encourage and enable staff and external parties to speak up. From time to time, Wire Industries may request feedback on your experience to ensure it is achieving its aim of creating a culture of openness, transparency and positive recognition of individuals who raise genuine concerns.

Global applicability

Whilst this policy and the standards contained herein are global, as appropriate, local law will apply to the handling of any particular case. This policy will be available to all personnel and external stakeholders via our intranet and external website.

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