

WHISTLEBLOWING POLICY	Effective date	Dec 2019
	Next review date	Dec 2021
	Sponsor	Manager, People and Culture
	Board committee	Quality & Safety Committee
LEVEL / CLASS ORGANISATION	Approval / authorisation	AVI Board

1 REVISION HISTORY

Date	Revision Number	Change(s)	Reference Section(s)
September 2010	1.0	Updated Policy Issued	
September 2012	2.0	Reissued Policy, considering requirements of Equal Opportunity Act 2010 (Vic)	all
December 2019	3.0	Updated policy in accordance with Whistleblower Protection Regime and Regulation 270	all

2 PURPOSE

AVI are committed to maintaining a high standard of corporate governance through a culture of strong ethical behaviour, integrity, transparency and accountability. Employees, contractors and subcontractors must fulfil their roles and responsibilities and meet their contractual obligations with honesty and integrity. This Policy outlines the procedure for our management of a Disclosable Matter (as defined below).

This Policy is not designed to replace normal communication channels between management and employees to address questions, concerns, suggestions or complaints. If employees have any concerns about what is proper conduct for themselves or others, it is expected they will raise their concern with their manager. In most instances, the employee's immediate manager is in the best position to address an area of concern. Serious matters or matters not satisfactorily resolved should be escalated through appropriate management channels in the normal course of business.

This policy is also not directed at "personal work-related grievances" (see further below at clause 5.1). Such grievances should be raised under AVI's Bullying, Harassment and Anti-Discrimination Policy and through the individual's manager and People and Culture.

The objectives of this Policy are:

- to encourage directors, employees, suppliers, contractors, tenderers, volunteers (**Personnel**) or any person who has business dealings with AVI, to report a Disclosable Matter according to this policy. We are committed to identifying and responding to a Disclosable Matter, and supporting anyone who decides to report it;
- to provide an appropriate procedure for individuals to report such conduct in the knowledge they can act without fear of intimidation, disadvantage or reprisal; and

- to ensure that any person who makes a report in accordance with this Policy (a **Whistleblower**) is appropriately protected from any **Detrimental Conduct** (as defined in this Policy).

3 INTERACTION BETWEEN THIS POLICY AND LEGISLATIVE WHISTLEBLOWER PROTECTIONS

In Australia, the various pieces of legislation that protect whistleblowers from detrimental treatment include the *Corporations Act 2001* (Cth) (**Corporations Act**) and *Taxation Administration Act 1953* (Cth) (**Whistleblower Protection Laws**). Other jurisdictions have their own whistleblowing regimes which need to be complied with to the extent they apply.

The purpose of this Policy is to ensure that AVI meets its obligations under the Whistleblower Protection laws, including by providing information about the protections available to whistleblowers.

4 SCOPE

This Policy applies to all **AVI** Personnel including but not limited to;

- Its current, or former officers, employees and volunteers (for example, current and former employees including permanent, part-time, fixed term or temporary, interns, secondees, managers, and directors);
- its supplier of services or goods (whether paid or unpaid), including their employees (for example, current and former contractors, consultants, services and business partners);
- its associates; or
- any relatives, dependants or spouses of an individual described in the above clauses (for example relatives, dependants or spouses of current and former employees, contractors, consultants, services providers, suppliers and business partners).

This policy applies whether you are at work or engaged in any work-related activity. It is not restricted in its operation to work hours or your usual place of work. It applies at conferences, work functions, work related social events, and business trips.

A copy of this Policy is available on our intranet and webpage or can be requested from People and Culture.

AVI's employees, officers and volunteers are required to comply with any lawful directions made by **AVI** in respect of this Policy. This Policy is not intended to be contractually binding and does not form part of any employment contract with **AVI**. **AVI** may amend this Policy at any time in its sole discretion.

5 WHAT IS A DISCLOSABLE MATTER?

To qualify for the protections under the Whistleblower Protection Laws, your disclosure must concern a 'Disclosable Matter'.

A Disclosable Matter means conduct that you have reasonable grounds to suspect is misconduct or an improper state of affairs or circumstances, relating to AVI or its related bodies corporate. This includes where there are reasonable grounds to suspect engagement in conduct that is unlawful or represents a danger to the public or the financial system, for example, money laundering, insider trading, or fraud.

A Disclosable Matter includes conduct which you have reasonable grounds to suspect was engaged in by an entity or person named in clause 4, and which:

- breaches any law under the Corporations Act, the *Australian Securities and Investments Commission Act 2001*, the *Banking Act 1959*, the *Financial Sector (Data Collection) Act*

2001, the *Insurance Act 1973*, the *Life Insurance Act 1995*, the *National Consumer Credit Protection Act 2009*, or the *Superannuation Industry (Supervision) Act 1993*;

- is an offence against any other law of the Commonwealth of Australia that is punishable by imprisonment for a period 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 a breach of a particular law).

A Disclosable Matter includes conduct that may not involve a contravention of a particular law.

By way of example only, a Disclosable Matter may include misconduct or serious wrongdoing that you reasonably believe:

- is dishonest, fraudulent or corrupt, or involves bribery or corruption, or an improper state of affairs or otherwise amounts to an abuse of authority;
- is illegal, including theft, drug sale or use, violence, or threatened violence, harassment, intimidation, or criminal damage to property;
- is in breach of Commonwealth or state legislation or local authority by-laws;
- is unethical, including dishonestly altering company records or data, adopting questionable accounting practices, or the unauthorised disclosure of confidential information;
- breaches **AVI's** Code of Conduct or other **AVI** policies;
- is potentially damaging to **AVI**, an **AVI** employee or a third party, or the public or the financial system, such as unsafe work practices, environmental damage, health risks or substantial wasting of company resources;
- amounts to an improper state of affairs or circumstances, in relation to the tax affairs of **AVI**, a related company or associated entity and this information may assist the recipient to perform their functions or duties in relation to those tax affairs;
- may cause financial or non-financial loss to **AVI**, damage its reputation or be otherwise detrimental to **AVI's** interests; or
- is an attempt to conceal or delay disclosure of any of the above conduct.

5.1 What is not a Disclosable Matter? - "Personal Work-related Grievances"

The whistleblower protections in the Whistleblower Protections Laws do not apply to a disclosure which is solely about a personal work-related grievance, where the grievance:

- concerns your current or former employment, and has (or tends to have) implications for you personally;
- has no significant implications for AVI or its related body corporate that do not relate to you; and
- does not concern actual or alleged conduct described above in Clause 5, or which breaches laws against whistleblower-related victimisation.

A personal work-related grievance may include the following:

- an interpersonal conflict between you and another employee;
- a decision relating to your terms and conditions of engagement, or to your engagement, transfer or promotion; and
- a decision to suspend or terminate your engagement, or otherwise to discipline you.

A personal work-related grievance may still qualify for protection under this policy and the whistleblower protections in the Corporations Act if:

- it includes information about actual or alleged conduct described above in clause 5;
- it relates to information which suggests misconduct beyond your personal circumstances; or
- it relates to a breach of laws against whistleblower-related victimisation.

If you wish to report a personal work-related grievance, please refer to the Bullying, Harassment and Anti-Discrimination Policy, your manager and/or People and Culture. Concerns of that nature should be raised:

- by Employees and Officers - with People and Culture; or
- Otherwise - concerns should be raised with your Manager.

Disclosures that are not about a Disclosable Matter do not qualify for protection under the Corporations Act.

6 MAKING A REPORT

6.1 Process for making a report internally

You should report a Disclosable Matter as soon as you become aware of it. If you wish to seek additional information before formally reporting a Disclosable Matter, you may contact any of our Whistleblower Protection Officers, listed below, or an independent lawyer.

You may wish to make an anonymous disclosure. You do not have to disclose your identity to AVI. An anonymous disclosure will qualify for the protection under the Corporations Act.

Where possible, AVI encourages any person reporting a matter under this Policy to identify themselves in order to enable AVI to investigate the matter fully. Knowing your identity may help AVI improve the effectiveness of any investigation.

In the first instance you should report a Disclosable Matter to the AVI Whistleblower Protection Officers (WPO) - Manger, People and Culture or the Chief Financial Officer, or any person we may nominate directly or via **Stopline**, an online portal: avi@stipline.com.au

If you need to report a Disclosable Matter about the Whistleblower Protection Officers, then you report to the CEO of AVI at pbird@avi.org.au

You may also report a Disclosable Matter to:

- an officer, senior manager, auditor or actuary of AVI; or
- Stopline (an independent external reporting service) using one of the following options:
 - Phone: 1300 30 45 50 (in Australia) OR +61 3 9811 3275 – Overseas (reverse charges)
 - Email: avi@stipline.com.au
 - Web: avi.stiplinereport.com
 - Post: AVI, c/o Stopline, Locked Bag 8, Hawthorn, Vic, Australia 3122
 - Fax: AVI, c/o Stopline +61 3 9882 4480
 - APP: Smart phone APP (free download from the Apple iTunes store & Google Play)
- You may make an anonymous disclosure at any time, including outside of business hours.

6.2 Process for making a report externally

You may also report a Disclosable Matter to the ASIC, APRA, or another Commonwealth body prescribed by regulation. This report will also qualify for whistleblower protection under the Corporations Act.

You may report a Disclosable Matter to a lawyer for the purpose of obtaining legal advice or representation relating to the operation of the whistleblower provisions in the Corporations Act. This report is protected even if the lawyer concludes that it does not relate to a Disclosable Matter.

6.3 Public interest or emergency disclosure

Alternatively, there are some circumstances where you can make a disclosure to an external agency or body.

You may report a Disclosable Matter to a member of parliament or a journalist, in circumstances where a disclosure constitutes a “public interest” disclosure or an “emergency” disclosure.

To make a **public interest disclosure**, you must:

- have previously reported the Disclosable Matter to a regulator specified above in 6.1 and at least 90 days must have passed since that previous report;
- after that 90-day period, give the regulator who received that previous report a written notice that:
 - includes sufficient information to identify your previous report; and
 - states that you intend to make a public interest disclosure;
- have reasonable grounds to believe that action is not being, or has not been, taken to address the matters relating to the previous report;
- have reasonable grounds to believe that making a further report to a member of parliament or journalist would be in the public interest; and
- disclose information to the member of parliament or a journalist only to the extent necessary to inform him or her of the Disclosable Matter.

To make an **emergency disclosure**, you must:

- have reasonable grounds to believe that the Disclosable Matter concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment;
- have previously reported the Disclosable Matter to a regulator specified above in clause 6.1 above, and you must also subsequently give it a written notice that:
 - includes sufficient information to identify your previous report; and
 - states that you intend to make an emergency disclosure; and
- disclose information to the member of parliament or a journalist only to the extent necessary to inform him or her of the substantial and imminent danger.

It is important for you to understand the above criteria for making a public interest disclosure or an emergency disclosure.

You should contact an independent lawyer before making a public interest disclosure or an emergency disclosure.

6.4 Confidentiality of your report

All information disclosed in your report, including your identity (where you choose to disclose this), will remain confidential to the extent required by law. However, where necessary, your identity may be disclosed:

- to ASIC, APRA or the AFP or (for tax-related disclosures) to the ATO; and
- to a lawyer for the purpose of obtaining legal advice or representation.

AVI will maintain confidentiality of any report and will take all reasonable steps to reduce the risk of disclosure of your identity during the course of any investigation, to the fullest extent possible.

6.5 Handling and investigating a report of a Disclosable Matter

If you report a Disclosable Matter under clause 6.1, to a person who works in AVI, you will be notified within 24 hours that your report has been received.

You should not attempt to investigate any Disclosable Matter yourself.

AVI will need to assess your report to determine whether:

- It qualifies for protection; and
- A formal, in-depth investigation is required.

We will respond to any report of a Disclosable Matter in an appropriate manner in accordance with our obligations under the Corporations Act.

Whilst our process and timing may vary depending on the nature of the Disclosable Matter, these are the key steps generally involved if we determine it appropriate to investigate a report of a Disclosable Matter:

- Within a reasonable period after receiving your report, we may:
 - Conduct an internal investigation into the substance of your report; or
 - Appoint an external investigator, or have AVI legal counsel appoint an external investigator, to determine whether there is evidence to support the matters raised in your report.
- We may also take such other steps as we consider reasonably appropriate to properly assess your report and to determine appropriate outcomes.
- You may be asked to provide additional information to assist any assessment or investigation of your report, including a description of the facts and circumstances of the misconduct or improper state of affairs or circumstances. If you have made an anonymous disclosure, it is important for you to check back in (for example via an anonymous email address or account) for this reason.
- We will decide what steps should be taken to address any verified misconduct or improper state of affairs or circumstances.
- At appropriate time/s, you will receive feedback on the progress or outcome of the assessment or investigation (subject to privacy and confidentiality restrictions). Again, if you have made an anonymous disclosure you should check back in on any email address or account.
- Without your consent, we cannot disclose information that is likely to lead to the identification of you as part of our investigation process, unless:
 - the information does not include your identity;

- we remove all information relating to your identity or other information that is likely to lead to the identification of you (for example, your name, position title and other identifying details); and
- it is reasonably necessary for investigating the issues raised in your report.
- We may not be able to undertake a comprehensive investigation if we are not able to contact you (for example, if the report is made anonymously and you have refused to provide, or have not provided, a means of contacting you).
- We will provide you with regular updates if you can be contacted (including through anonymous channels). The frequency and timeframe may vary depending on the nature of your report.
- The method for documenting and reporting the findings from an investigation will depend on the nature of the report. Those findings will be documented and reported to those responsible for oversight of this policy. In doing so, we will preserve confidentiality by taking measures described in clause 7.3.
- At the end of the investigation, a report can be made available to you unless circumstances are such that it may not be appropriate to provide details of the outcome to you.

7 WHISTLEBLOWER PROTECTION

We are committed to protecting and supporting whistleblowers who report a Disclosable Matter according to this policy.

To qualify for whistleblower protection under the Corporations Act (or, where relevant, the *Taxation Administration Act 1953* (Cth)), your report must be made directly to a person specified above in clause 6.1.

As noted above, you may also report a Disclosable Matter to the ASIC, APRA, or another Commonwealth body prescribed by regulation. This report will also qualify for whistleblower protection under the Corporations Act.

You may report a Disclosable Matter to a lawyer for the purpose of obtaining legal advice or representation relating to the operation of the whistleblower provisions in the Corporations Act. This report is protected even if the lawyer concludes that it does not relate to a Disclosable Matter.

The following protections are available to whistleblowers:

- Protection from detrimental acts or omissions
- Identity protection (confidentiality);
- Compensation and other remedies; and
- Civil, criminal and administrative liability protection.

Those protections apply not only to internal disclosures, but to disclosure to lawyers, regulatory and other external bodies, and public interest and emergency disclosures described in clause 6.2.

You can still qualify for protection even if your disclosure turns out to be about matters which cannot be substantiated.

7.1 Protection from detrimental acts or omissions

If you report a Disclosable Matter under this policy, there are legal protections for protecting you (or any other person) from detriment in relation to your report

A Whistleblower Protection Officer may be appointed to assist you with any Reportable Disclosure, including to take reasonable steps to ensure that you are not subject to any detrimental conduct as a result of making your report.

A person cannot engage in conduct that causes detriment to you (or another person), in relation to your report, if:

- The person believes or suspects that you (or another person) made, may have made, proposes to make or could make a report that qualifies for protection; and
- The belief or suspicion is the reason, or part of the reason, for the conduct.

A person cannot make a threat to cause detriment to you (or another person) in relation to your report. A threat may be express or implied, or conditional or unconditional. If you or another person have or has been threatened, it is not a requirement for you or the other person to actually fear that the threat will be carried out.

In this Policy, **Detrimental Conduct** includes the following (even if done unintentionally):

- action causing injury, harm, loss or damage (including psychological harm);
- damaging a person's property, reputation, business or financial position or causing any other damage to a person;
- intimidation, bullying or harassment;
- discrimination or other adverse treatment in relation to the Whistleblower's employment, career, profession, trade or business, including dismissal, demotion or the taking of other disciplinary action;
- current or future bias;
- action that constitutes the making of a threat to cause any such Detrimental Action to another person; or
- any conduct which incites others to subject the Whistleblower to any of the above conduct.

Examples of actions that are not Detrimental Conduct include:

- managing your unsatisfactory work performance, if the action is in line with AVI's performance management framework;
- administrative action that is reasonable for the purposes of protecting you from Detrimental Conduct (or threats of Detrimental Conduct) because of the disclosure.

AVI will take all reasonable steps to protect Whistleblowers from detriment by:

- assigning a Whistleblower Protection Officer to you (where possible) to monitor your well-being while any disclosable matter is being investigated.
- carrying out an assessment of the likely risk of Detrimental Conduct following receipt of a disclosure;
- making support services (including counselling or other professional or legal services) available to whistleblowers (and other AVI Personnel);
- where practicable and subject to confidentiality obligations, consulting with whistleblowers (and other AVI Personnel) as to any measures that might be taken to minimise and manage stress, time or performance impacts, or other challenges resulting from the disclosure or its investigation;
- taking other administrative action that is reasonable for the purpose of protecting whistleblowers (and other AVI Personnel) from detriment (including, for example, moving

a whistleblower who has made a disclosure about their immediate work area to another area to prevent them from detriment, temporarily reassigning an individual with another role at the same level or making other modifications to an individual's workplace or the way they perform their work duties);

- encouraging the reporting of any instances of Detrimental Conduct and implementing actions that may be taken in response (including, for example, ensuring that complaints are investigated as a separate matter by an individual who is not involved in handling or investigating the disclosure); and
- where Detrimental Conduct is found to have occurred, taking immediate steps to address the detriment (including by, for example, taking disciplinary action, permitting an extended period of leave, offering counselling or other professional or legal services and/or offering compensation or other remedies).

If you believe you have suffered detriment as a result of making a Disclosable Report or in association with any Disclosable Report, you should notify your WPO or the CEO or Stopline immediately, as it will assist AVI to better protect you to the extent possible. All reports of detrimental treatment will be treated confidentially.

If a person (whether the Whistleblower or not) believes on reasonable grounds that the Whistleblower has been, or is likely to be, subjected to Detrimental Conduct, he or she or they should report this to the WPO, who will investigate, or arrange an investigation into, the matter.

7.2 What are the consequences of Detrimental Conduct?

An employee who is found to have subjected or threatens to subject a Whistleblower to Detrimental Conduct will be subject to disciplinary action in accordance with AVI's disciplinary procedures (which may include termination of employment) and may be subject to prosecution under legislation including the Corporations Act for civil and criminal penalties. See further below at clause 8.3.

AVI may terminate the contract or engagement of non-employees or take other corrective action.

7.3 Identity protection (confidentiality of disclosures)

Your report can be made anonymously and still be protected under the Corporations Act.

You can choose to remain anonymous while making a report, over the course of the investigation and after the investigation is finalised. You can refuse to answer questions that you feel could reveal your identity at any time, including during follow-up conversations. If you wish to remain anonymous, you should maintain ongoing two-way communication with AVI, so that AVI can ask follow-up questions or provide feedback.

All information provided by a Whistleblower will be treated as confidential and maintained securely.

The identity of a Whistleblower will be kept confidential, unless any of the following apply:

- they consent to this information being disclosed;
- **AVI** needs to disclose this information to obtain legal advice or representation;
- **AVI** is required to do so by law (for example where **AVI** needs to disclose this information to an external regulator or **AVI** is ordered to do so by a court);
- The information is provided to APRA, ASIC or a member of the police; or
- **AVI** needs to disclose the information to prevent a serious and imminent threat to life, health or property.

Information contained in a Whistleblowers report, can be disclosed with or without the Whistleblower's consent if:

- The information does not include your identity;
- All reasonable steps have been taken to ensure that the Whistleblower's identity is not disclosed; and
- It is reasonably necessary for investigating the issues raised in your report.

It is unlawful for a person to disclose your identity or information that is likely to lead to identification of you, except in accordance with clause 8.2 above.

If any Personnel receives information about a Disclosable Matter, and does not keep that information confidential or discloses any information that is likely to lead to the Whistleblower being identified (except in the circumstances permitted above):

- If they are **AVI** employees – they will be subject to disciplinary action, which may include a formal written warning, or termination of employment with **AVI**;
- If they are not a **AVI** employee – **AVI** may take other corrective action; and
- They may be subject to criminal and civil penalties, including substantial fines and / or jail.

This applies even if they did not receive the disclosure but received the information indirectly.

Measures that AVI will take to protect your identity may include the following:

- **AVI** will ensure that files and records relating to disclosures are kept confidential and stored securely;
- redacting identifying personal information of the whistleblower in written material;
- referring to the whistleblower in a gender-neutral context; and
- where practicable, consulting with the whistleblower in relation to measures that might be taken in order to maintain confidentiality and other identifying information; and
- ensuring that AVI Personnel likely to be involved in the handling and investigation of a Disclosable Matter are trained in accordance with the requirements of confidentiality / anonymity.

7.4 What support and protections are provided to Whistleblowers?

Part of the role of the WPO is to safeguard the interests of Whistleblowers, to assist them to understand the process and the available protections and to ensure the integrity of the whistleblowing mechanism. Whistleblowers who are an employee or officer of **AVI**:

- are entitled to support through the WPO;
- may explore options such as taking leave, relocation to another area of business, or a secondment arrangement while the concern is being investigated.

Employees will not be subject to disciplinary action for making a disclosure of Reportable Conduct under this policy on reasonable grounds. They may, however, still be subject to disciplinary action for misconduct that is identified as a result of the disclosure, however **AVI** may take the disclosure into account, as well as any immunity provided for in the Corporations Act or other legislation (see further at clause 8.2 below when determining the nature of any disciplinary action).

If any Whistleblower considers that the person to whom they made a disclosure of Reportable Conduct has not dealt with the report appropriately, or at all, they may raise a concern in writing with the Whistleblower Protection Officer (where a WPO has been appointed) or to the CEO or to the Chair of the Board AVI.

8 PROTECTIONS AVAILABLE TO DISCLOSERS AT LAW

8.1 Compensation and other remedies

You (or any other employee or person) may also be able to seek compensation and other remedies through the courts in circumstances including the following:

- For suffering loss, damage or injury because you reported a Disclosable Matter under this policy;
- If you are subject to detrimental conduct as a result of making a Reportable Disclosure, you may seek remedies under the Whistleblower Protection legislation including reinstatement, compensation, an order prohibiting the detrimental conduct and/or an apology; and
- Where AVI fails to take reasonable precautions and exercise due diligence to prevent the Detrimental Conduct.

You may seek independent legal advice on compensation or other remedies that may be available.

8.2 Immunity

If Whistleblowers make a protected disclosure under the Whistleblower Protection Laws, these laws provide that:

- they cannot be subject to any civil, criminal or administrative liability, for making a protected disclosure;
- they may be subject to civil, criminal or administrative liability for misconduct that is revealed by their disclosure;

however, if the disclosure is made to ASIC, APRA or the Commissioner of Taxation, or is an Emergency Disclosure as permitted under the *Corporations Act*, the information is not admissible in evidence against the Whistleblower in criminal proceedings, or in proceedings for the imposition of a penalty, except for proceedings in respect of providing false information.

8.3 Penalties and other consequences of engaging in detrimental conduct

In addition to the potential disciplinary action outlined above in clause 7.2, an individual who engages in detrimental conduct against a whistleblower may be subject to:

- An order from a Court that any compensation payable to a Whistleblower be paid personally by the individual engaging in the detrimental conduct;
- Civil and criminal penalties which may be up to \$10 million and/or two years prison; and
- A Whistleblower may also have other protections under the Fair Work Act.

9 ENSURING FAIR TREATMENT OF INDIVIDUALS IDENTIFIED IN ANY DISCLOSURE

Measures that we will take to ensure fair treatment of our employees or any individuals who may be identified in a report of a Disclosable Matter under this policy, or who are the subject of any such report, may include the following:

- Disclosures will be handled confidentially, when it is practicable and appropriate for the circumstances;
- Each disclosure will be assessed and may be the subject of an investigation;
- The investigation will determine if there is enough evidence to substantiate or refute the matters reported;

- When an investigation needs to be undertaken, the process will be objective, fair and independent;
- An employee who is the subject of a disclosure will be advised about the subject matter of the disclosure as and when required by principles of natural justice and procedural fairness and prior to any actions being taken; and
- An employee who is the subject of a disclosure may contact AVIs EAP service

10 RESPONSIBILITIES

10.1 CEO and Board Directors

- ensure as far as is reasonably practicable that the workplace is free from unethical behaviour
- address all complaints promptly, confidentially and in accordance with the Policy and Procedure
- appoint an Investigator where appropriate to investigate complaints
- review the Investigator's report and recommendations
- make determinations regarding appropriate actions following an investigation
- review appeals from complainants and respondents
- review and authorise this Policy and Procedure and any amendments at the sole discretion of AVI
- authorise termination of employment where appropriate

10.2 People and Culture

- provide advice and guidance on all relevant policies & procedures to complainants, respondents and managers
- address all complaints promptly, confidentially and in accordance with the Policy and Procedure
- conduct investigations where required
- appoint an Investigator where appropriate to investigate complaints
- co-ordinate the investigation process
- review the Investigator's report and recommendations
- support managers in all steps of the procedure

10.3 Manager

- ensure as far as is reasonably practicable that the workplace is free from unethical behaviour
- address all complaints promptly, confidentially and in accordance with the Policy
- provide advice to complainants about the complaint's procedure
- ensure that complainants, respondents or witnesses are not subject to victimisation
- support the complainants, respondents & witnesses in all steps of the complaints process
- implement and review the strategies and action taken as part of the resolution process

10.4 Employees

- apply AVI's Code of Conduct and values in everyday work
- behave in an appropriate manner to avoid adversely affecting others
- report incidents, or encourage others to report incidents, in good faith, and in a timely manner
- maintain confidentiality of issues subject to complaint
- refrain from victimising complainants, respondents or witnesses
- co-operate fully and in good faith with investigations and the resolution process

11 RELATED DOCUMENTS

- Code of Conduct
- Bullying, Harassment and Anti-Discrimination Policy
- Gender Equality Policy
- Mobile Devices Policy
- Privacy Policy
- PSEAH Policy
- Social Media Policy