GERARD LIGHTING

Whistleblower Protection Policy

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1 Introduction

Gerard Lighting's Code of Conduct and policies have been developed to ensure high standards of conduct and ethical behaviour. This Whistleblower Protection Policy has been developed to ensure that Gerard Lighting employees can raise concerns regarding actual or suspected contravention of our policies and legal obligations without fear of reprisal or feeling threatened by doing so.

This Policy aims to:

- encourage people to report an issue if they genuinely believe someone has contravened our Code of Conduct, policies or the law;
- outline how Gerard Lighting will properly deal with all reported misconduct or unethical behaviour; and
- assist in ensuring that serious misconduct or unethical behaviour is identified and dealt with appropriately.

2 What to Report

All employees are encouraged to report any matters that they honestly believe contravene the Code of Conduct, policies or the law. For the purposes of making a report under this Policy, matters may include any actual or suspected:

- conduct or practices which are illegal;
- breach of any of policies;
- corrupt activities;
- theft, fraud or misappropriation;
- significant mismanagement or waste of funds or resources;
- abuse of authority;
- serious harm to public health, safety or environment or the health and safety of any employee; or
- any action taken against, or harm suffered by an employee as a result of making report under this Policy.

3 How to Report

If you become aware of any matter you genuinely think contravenes Code of Conduct, polices or the law, then you should:

- take the matter up with you immediate supervisor or manager; OR
- eport it to the Company Secretary.

4 Investigation

We will investigate all reported concerns appropriately and will, where applicable, provide feedback regarding the investigation's outcome. We will take the necessary course of action in response to a report and if no action is taken we will give you an explanation.

Your identity and the fact that you have made a report and the contents of the report will be kept confidential and no details of your participation in this process will be included in your personnel file or performance review. The report will not be disclosed to anyone except those that are actively involved in investigating the matters raised in the report.

5 Protection

You will not be discriminated against or disadvantaged in your employment with Gerard Lighting for making a genuine report in accordance with this Policy, nor will you receive reprisals due to your actions in making a report. Gerard Lighting will take all reasonable steps to ensure that adequate and appropriate protection is being provided for those who, in good faith, make a report.

This protection applies if the matter is proven or not, regardless of whether it is reported to an external authority, provided it is not malicious, deliberately misleading or frivolous (in which case you could be the subject of disciplinary action).