Whistleblower Policy

25 June 2026

Public

TasNetworks acknowledges the palawa (Tasmanian Aboriginal community) as the original owners and custodians of lutruwita (Tasmania). TasNetworks, acknowledges the palawa have maintained their spiritual and cultural connection to the land and water. We pay respect to Elders past and present and all Aboriginal and Torres Strait Islander peoples

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1 Policy overview

TasNetworks is committed to the highest standard of conduct and to facilitating the disclosure of improper conduct.

We recognise that a key part of this commitment is to provide a means for employees and others to report their concerns with confidence and without fear of repercussions.

TasNetworks has obligations under the under the *Public Interest Disclosure Act 2002* (Tas) (**PID Act**), the *Corporations Act 2001* (Cth) (**Corporations Act**) and the *Tax Administration Act 1953* (Cth) (**Tax Act**). This policy describes the protections available to Eligible Whistleblowers under the different legislations, the processes to be followed and the support offered by TasNetworks.

2 Who does this Policy apply to?

This policy applies to all TasNetworks' officers, leaders and team members. It also applies to other persons able to make disclosures under the PID Act, Corporations Act and Tax Act (for example, relatives of an employee, or TasNetworks' contractors).

Persons covered by this policy are requested to comply with this policy as a lawful and reasonable direction, noting that this policy is not contractual in nature, is not incorporated into any employment or other contract and does not have contractual force.

This policy applies to TasNetworks and its subsidiaries. Reference to TasNetworks in this policy includes a reference to its subsidiaries.

3 The Policy

3.1 Purpose

The purpose of this policy is to outline TasNetworks' approach to disclosures made under the PID Act, the Corporations Act and the Tax Act. TasNetworks recognises the importance of robust whistleblower processes in order to:

- provide protection to disclosers;
- improve whistleblowing culture and increase transparency;
- encourage disclosure of wrongdoing; and
- deter wrongdoing, promoting stronger compliance and an ethical culture.

The State regime (under the PID Act) and the Federal regime (under the Corporations Act and Tax Act) operate separately, but in some circumstances, they may overlap due to the types of disclosures being capable of protection under both regimes.

TasNetworks will monitor the operation and interaction of the two regimes and amend this policy where applicable, as further guidance becomes available from State and Federal authorities.

3.2 State regime

A disclosure made under the PID Act will be managed by TasNetworks in accordance with **Annexure A** of this policy. Refer to Annexure A for details of who is eligible to make a disclosure and the types of disclosures that are protected.

3.3 Federal regime

A disclosure made under the Corporations Act or Tax Act will be managed in accordance with **Annexure B** of this policy. Refer to Annexure B for details of who is eligible to make a disclosure and the types of disclosures that are protected.

3.4 Dual application

Where a disclosure is to be managed under both the Federal and State regimes, to the extent of any inconsistency between the Federal and State legislative regimes, the Lead Counsel – Company and Compliance will advise as to the operation of both legislative regimes.

4 Disclosures under the Policy

4.1 Independent Reporting Service

TasNetworks is committed to the appropriate investigation of matters raised by Whistleblowers.

TasNetworks has an independent reporting service available to Whistleblowers through Deloitte, accessed via email, phone, online, post or fax. Unless advised otherwise by the whistleblower, the independent reporting service will keep the whistleblower's identity anonymous. Whistleblowers who choose to contact the service **by phone, email or online are advised to do sousing a non-TasNetworks device**. This is because whilst every care is taken to protect the anonymity of users of this service, information may be indirectly retained on TasNetworks' servers.

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This independent service can be accessed through the following means:

Email: TasNetworks@deloitte.com.au

Phone: 1800 929 090

Online: www.tasnetworks.deloitte.com.au

Post: TasNetworks Independent Whistleblower Reporting Service
Reply Paid 12628 A'Beckett Street
Victoria 8006

Fax: +61 2 9255 8328

4.2 Assistance

TasNetworks encourages anyone who is aware of any wrongdoing at TasNetworks to speak up.

For those people to whom this policy applies, TasNetworks recognises that the overlapping Federal and State regimes may be difficult to navigate. TasNetworks will support any concerned potential whistleblower to navigate the whistleblower process. If you have any concerns or are unclear about the processes or protections available, you are encouraged to contact one of the following people for a confidential conversation:

- Lead Counsel – Company and Compliance: Madeline.Sheehan@tasnetworks.com.au; Mob: 0456 912 941; or
- Special Counsel – Corporate Services: Michael.Howarth@tasnetworks.com.au; Mob: 0429 940 898

The following people are authorised recipients under the Federal and State regimes:

- Executive Governance: Chantal.Hopwood@tasnetworks.com.au; Mob: 0400 827 037
- Executive People & Stakeholder: Renee.Anderson@tasnetworks.com.au; Mob: 0415 063 485
- Head of Digital: Hayley.Sheppard@tasnetworks.com.au; Mob: 0402 551 661
- Head of Asset Management: Josh.Cunningham@tasnetworks.com.au; Mob: 0438 516 407

If a disclosure is made, the following people will support administratively unless implicated in the disclosure:

- Head of Business Governance: Chris.Noye@tasnetworks.com.au; Mob: 0417 399 009
- Lead Counsel – Company and Compliance: Madeline.Sheehan@tasnetworks.com.au; Mob: 0456 912 941

4.3 Disclosure content

A disclosure should include as much detail as possible to allow a thorough assessment and, where appropriate, investigation. Where applicable, this includes:

- Time, date and location of the incident or issue
- Names of involved parties and any witnesses
- Evidence, or information about potential evidence which can support the disclosure
- Reprisal concerns (if any)

4.4 Care when making a disclosure

A disclosure that is made in good faith but that ultimately turns out to be incorrect can still qualify for protections and will be supported.

Individuals are responsible for ensuring that they do not knowingly make a false report and are required to act honestly with reasonable belief about the content of the report.

In cases where disclosers have some information but not all of the details, they are encouraged to report the issue and will not face disciplinary action where the disclosure is provided in good faith, but the allegation turns out to be unsubstantiated.

5 Roles and responsibilities

TasNetworks Board: has responsibility for approving this policy, and ensuring any organisational risks highlighted by any disclosures are addressed and mitigated by TasNetworks.

Public Interest Disclosure (PID) Officers and Principal Officer: the Executive Governance, Executive People & Stakeholder, Head of Digital, and Head of Asset Management are Public Interest Disclosure Officers under the PID Act. The CEO is the Principal Officer under the PID Act.

Federal Eligible Recipients: all officers and senior managers (which will include TasNetworks' directors, CEO and Executives) are eligible recipients of disclosures under the Federal regime. Under s 1317AAC of the *Corporations Act 2001* (Cth), the Head of Digital and Head of Asset Management are authorised to receive disclosures under the Federal Scheme.

6 References

- *TasNetworks Code of Conduct*
- *Public Interest Disclosure Act 2002* (Tas)
- *Corporations Act 2001* (Cth)
- *Tax Administration Act 1953* (Cth)
- *TasNetworks' PID Act Model Procedures*
- *ASIC Regulatory Guide 270 – Whistleblower Policies*

7 Compliance

All TasNetworks Officers, Leaders, Team Members and others to which this policy applies are responsible for complying with this policy. Any breaches of this policy will be treated seriously and may result in disciplinary action.

8 Distribution

All Officers, Leaders and Team Members will have access to this policy and underpinning policies on The Zone. This policy will also be published on TasNetworks' external website.

The policy has been reviewed by the TasNetworks Board and Leadership Team prior to publication, to ensure awareness of the obligations in relation to whistleblowing and receipt of disclosures.

Periodic training will be conducted to ensure ongoing awareness of the whistleblowing process.

9 Administration of this Policy

The Corporations Act contains certain requirements for whistleblower policies. TasNetworks considers that this policy complies with those requirements.

This policy is administered by the Executive Governance and will be reviewed at least every two years or when there is a significant change to the business or law which may impact this policy.

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6.0	Version for Board approval	K Bradshaw / M Chan	TasNetworks Board	28/11/2019
7.0	Periodic update	M Sheehan	TasNetworks Board	03/2022
7.1	Draft review to update PID Officers, clarify purpose,	H Craig	TasNetworks Board	11/2023

	incorporate additional details for contacting independent hotline, removal of TasNetworks hotline information and include section on care with making a report.			
8.0	Version for Endorsement (ARCC) and Approval (Board)	H Craig	Audit Risk and Compliance Committee (Endorsed) TasNetworks Board (Approved)	14/12/2023
9.0	Update regarding the use of TasNetworks Devices	H Craig	TasNetworks Board	31/05/2024
9.1	Updates to PID Officers and further information on details required to assess claims	C Noye M Sheehan	TasNetworks Board	02/04/2026
9.2	Update to clarify support for all parties	M Sheehan	TasNetworks Board	30 July 2026

Annexure A – Whistleblower protections under the PID Act

Overview

Disclosures under the State regime may be made by:

- Public officers, being the members, officers and employees of TasNetworks; and
- Contractors, being an entity who has entered into a goods or services contract with TasNetworks, or any employee or subcontractor of that contractor.

Disclosures may be made relating to:

- "improper conduct" by another public officer or TasNetworks; or
- "detrimental action" by another public officer or TasNetworks against a person in reprisal for making a protected disclosure under the State regime.

"Improper conduct" means serious or significant illegal or unlawful activity, corrupt conduct, maladministration, professional misconduct, waste of public resources, conduct constituting a danger to public health and/or safety or a danger to the environment or a breach of the code of conduct.

"Detrimental action" means action causing injury, loss or damage, intimidation or harassment, discrimination, disadvantage or adverse treatment in relation to employment, career, profession, trade or business (including taking disciplinary action) and threats of detrimental action.

A public officer may make a complaint about TasNetworks or another public officer; and a contractor may only make a complaint about TasNetworks.

The disclosure cannot be about conduct that is more than three years old.

A disclosure that meets the above requirements and is made to an eligible person as described in section 3 (Annexure A) below will be a "protected disclosure".

Protections available

Detrimental action protections

The State regime prohibits detrimental action (as defined in section 1 (Annexure A) above) from being taken (or threatening or inciting such action) against a person in reprisal for a making or intending to make a protected disclosure (or on the basis of a belief of such disclosure).

A person who makes a protected disclosure is protected from any civil, criminal or administrative liability for making the disclosure. This immunity does not apply to any improper conduct of the person that is the subject of the disclosure.

The courts are able to make a wide variety of preventative and compensatory orders if detrimental action is established.

Identity protection (confidentiality)

The State regime requires that information in respect of a protected disclosure must not be disclosed (including the identity of the discloser), with limited exceptions.

How disclosures may be made, and to whom

Generally

A disclosure made by a public officer under the State Regime may be made to:

- the Ombudsman;
- the Tasmanian Integrity Commission; or

- TasNetworks, via the Principal Officer (the CEO) or the delegated Public Interest Disclosure Officers (the Executive Governance, Executive People and Stakeholder, Head of Asset Management and Head of Digital).

A disclosure made by a contractor under the State Regime may be made to the:

- Ombudsman; or
- Tasmanian Integrity Commission.

At TasNetworks

As noted in this policy, the Executive Governance, Executive People and Stakeholder, Head of Asset Management and Head of Digital are eligible recipients of disclosures under both the Federal and State regimes, so TasNetworks encourages disclosures being made to these officers to ensure appropriate support is provided across the State and Federal regimes.

TasNetworks also maintains a Whistleblower hotline via which disclosures can be made (see section 4.1 of this policy).

Disclosures can be made via any method of communication (for example, email, phone, post or in person), and may be made anonymously.

A disclosure must be made directly to one of the eligible persons listed above to quality for protection.

Support available to Whistleblowers

TasNetworks supports all whistleblowers by:

- providing confidential and accessible methods to make disclosures, including anonymously;
- providing support to navigate the dual Federal and State whistleblower regimes;
- treating all disclosures strictly in confidence;
- protecting people who seek access to the whistleblower framework from victimisation and other detrimental action;
- assigning a dedicated welfare manager to support the discloser;
- promptly reviewing and investigating all disclosures; and
- complying with all requirements of the State regime.

Support available to those impacted by a disclosure

TasNetworks is committed to supporting the wellbeing of people who are the subject of disclosures. A dedicated welfare manager will be assigned to a person who is the subject of an investigation when they are advised of the disclosure.

Support available to those involved in investigations

TasNetworks recognises that people involved in an investigation may also require support throughout the investigation. Where appropriate, a welfare manager will be appointed to any person who is involved in an investigation, such as a witness.

Investigation of disclosures and procedural fairness

TasNetworks is required to have extensive procedures available for management and investigation of disclosures under the State regime. TasNetworks has adopted the model procedures issued by the Ombudsman. Those procedures are available on the Zone and on TasNetworks' external website.

Annexure B – Whistleblower protections under the Corporations Act and Tax Act

Overview

Eligible Whistleblowers

"Eligible Whistleblowers" under the Federal regime include:

- Officers and employees of TasNetworks;
- Goods and service providers to TasNetworks and their employees;
- Associates of TasNetworks (which includes the directors and company secretary of TasNetworks, as well as TasNetworks' subsidiaries); and
- A relative or dependant of any of the above.

Disclosable matters

A disclosure made by an Eligible Whistleblower qualifies for protection under the Federal regime if the disclosure is made in accordance with section 3 (Annexure B) below, and the disclosure contains information that the Eligible Whistleblower has reasonable grounds to suspect indicates one of the following matters:

- Misconduct or improper state of affairs or circumstances (including in relation to tax affairs). Misconduct includes fraud, negligence, default, breach of trust and breach of duty;
- Conduct that constitutes an offence against, or in contravention of, any of the following: *Corporations Act 2001* (Cth), *Australian Securities and Investments Commission Act 2001* (Cth), *Banking Act 1959* (Cth*), Financial Sector (Collection of Data)* Act 2001 (Cth), *Insurance Act 1973* (Cth), *Life Insurance Act 1995* (Cth), *National Consumer Credit Protection Act 2009* (Cth), *Superannuation Industry (Supervision) Act 1993* (Cth);
- Conduct that constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of twelve months or more; or
- Conduct that represents a danger to the public or the financial system.

The conduct does not need to be contrary to a particular law to be protected.

Disclosures that do not fit within the definitions above are not covered and protected under the Federal regime.

Examples of disclosure of conduct at TasNetworks that are likely to qualify for protection under this regime include:

- Offering or accepting a bribe;
- Fraud or misappropriation of funds;
- Engaging in detrimental conduct against someone who has made a whistleblower disclosure; and
- Illegal conduct such as theft, illicit drug use, violence or criminal damage.

Disclosures that relate to personal work-related grievances do not qualify for protection. Examples include:

- interpersonal conflict at work;
- a decision about promotion; and
- a decision to suspend or terminate employment, or other disciplinary action.

These matters do not, of themselves, qualify for protection. However, a personal work-related grievance may still qualify for protection to the extent it includes information about a disclosable matter (for example, the grievance also involves fraud or other misconduct).

A disclosure that ultimately turns out to be incorrect can still qualify for protection.

Protections available

Detrimental action protections

The Federal regime prevents:

- any victimisation or detrimental action (for example, termination of employment, demotion or harassment) by a person against another person on the basis of a belief that the person has accessed or intends to access the whistleblower protections in the Federal regime; and
- any action (for example, via civil, criminal or administrative action) being taken against an Eligible Whistleblower for making a disclosure that qualifies for protection. This protection does not apply to any conduct of the discloser which is a part of the disclosed conduct (for example, if the discloser has engaged in misconduct).
- The courts are able to make a wide range of orders in the event that any of the conduct described above is established, including orders for compensation (if a discloser suffers loss, damage or injury because of a disclosure and TasNetworks failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct), injunction (to prevent the conduct), reinstatement (in relation to termination of employment) and an apology.

Identity protection (confidentiality)

The Federal regime also requires that the identity of the Eligible Whistleblower is protected, subject to limited exceptions (including with the consent of the Eligible Whistleblower).

TasNetworks takes these protections seriously and will take all reasonable steps to ensure these protections are available to any Eligible Whistleblower. The protections apply not only to internal disclosures, but to all methods of disclosure referred to in section 3 (Annexure B) below. It is illegal for a person to identify a discloser, or to disclose information that is likely to lead to the identification of the discloser, unless limited exceptions apply (for example, with the consent of the discloser).

How disclosures may be made, and to whom

Generally

A disclosure under the Federal regime may be made to:

- the Australian Securities and Investments Commission, the Australian Prudential Regulation Authority or other Federal authority that may be designated under the legislation. Each of these entities publishes information on how disclosures may be made to them;
- an officer or senior manager of TasNetworks (including TasNetworks' directors and ELT members); and
- TasNetworks' internal or external auditor. Currently, TasNetworks uses KPMG as its internal auditor.

There are other eligible recipients under the Tax Act specifically in respect of tax-related disclosures.

The Federal regime provides for:

- disclosures to also be made to a member of Federal or State parliament or a journalist in certain circumstances. You are encouraged to look at the criteria for making such a disclosure before taking this step; and
- disclosures to be made to a legal advisor for the purpose of getting legal advice in relation to whistleblower protection.

At TasNetworks

TasNetworks encourages disclosures to be made to a TasNetworks officer or senior manager in the first instance (being one of TasNetworks' directors or ELT members). A disclosure can be made confidentially and directly to any such individual, in person, by phone or email. As noted in section 4.2 of this policy, the Executive Governance, and Executive People and Stakeholder , Head of Asset Management and Head of Digital are eligible recipients of disclosures under both the Federal and State regimes, so TasNetworks encourages disclosures being made to these officers to ensure appropriate support is provided across the State and Federal regimes.

TasNetworks also maintains a Whistleblower hotline via which disclosures can be made (see section 4.1 of this policy).

Disclosures can be made at any time (including after hours) and may be made anonymously if necessary. Anonymous disclosures are still protected under the Corporations Act. Anonymity is protected while making a disclosure, over the course of the investigation and after the investigation is finalised. A disclosure must be made directly to one of the eligible persons to quality for protection.

Support available to Whistleblowers

TasNetworks supports all Eligible Whistleblowers by:

- providing confidential and accessible methods to make disclosures, including anonymously;
- providing support to navigate the dual Federal and State whistleblower regimes;
- treating all disclosures strictly in confidence. Any disclosure made to TasNetworks will:
    - be treated in confidence by the TasNetworks recipient (for example, by redacting documentation and gender neutral references);
    - be investigated by the Executive Governance and Legal Services (or other person in consultation with the discloser, if appropriate);
    - be treated securely, by securely storing all relevant documentation and having restrictions placed on information management and file retention; and
    - facilitate anonymous disclosure and ongoing communication, if preferred by the discloser; and
- protecting people who seek access to the whistleblower framework from victimisation and other detrimental action, including by:
    - maintaining confidentiality;
    - providing a dedicated welfare manager to the discloser, and providing regular updates regarding investigation of the disclosure (if the discloser is able to be contacted, including by anonymous channels);
    - conducting a risk assessment to ensure the work environment is suitable and safe for the discloser on an ongoing basis;
    - providing all reasonably necessary support services to the discloser (for example, TasNetworks' employee assistance services or other external counselling if appropriate). Independent legal advice is also available to any potential discloser, and in appropriate circumstances this cost may be met by TasNetworks; and
    - promptly investigating and addressing any reported incidents of detrimental action against the discloser;
- promptly reviewing and investigating all disclosures; and
- complying with all requirements of the Federal regime.

Support available to those impacted by a disclosure

TasNetworks is committed to supporting the wellbeing of people who are the subject of disclosures. A dedicated welfare manager will be assigned to a person who is the subject of an investigation when they are advised of the disclosure.

Support available to those involved in investigations

TasNetworks recognises that people involved in an investigation may also require support throughout the investigation. Where appropriate, a welfare manager will be appointed to any person who is involved in an investigation, such as a witness.

Investigation of disclosures and procedural fairness

Process

The key steps that will be taken in response to any disclosure are:

1. Assess the disclosure and consider application of the Federal and State regimes – this is a preliminary assessment step to give the discloser clarity as to the application of the whistleblower regimes.
2. If the Federal regime is determined to apply to the disclosure, then:
    a. Consider reporting requirements (for example, to external authorities).
    b. Appoint welfare managers for the discloser, person/s who are subject to the disclosure and anyone implicated by the investigation (if required).
    c. Consider the scope of investigation required.
    d. Advise the Audit, Risk and Compliance Committee.
    e. Conduct investigation (as appropriate, and with due consideration to confidentiality and procedural fairness).
    f. Report outcomes to the discloser and the Audit, Risk and Compliance Committee, including a copy of the investigation report into the matter (where a formal investigation is conducted), while ensuring that confidentiality is maintained.
3. If the Federal regime does not apply to the disclosure, the matter may still be referred to investigation or other action under TasNetworks' existing organisational processes.

The extent of each action and timeframes in which they will be conducted depend on the nature and scope of the disclosure made. However, in relation to timeframes:

- (step 1) the assessment of application of the whistleblower protections will be advised to the discloser within 45 days of the disclosure being made (consistent with the State regime); and
- (step 2(e)) formal investigations will usually be conducted within 90 days of the disclosure being made.

Procedural fairness

TasNetworks acknowledges that any persons who are the subject of a disclosure are entitled to procedural fairness in the course of any investigation and any subsequent actions (if any). Such procedural fairness includes:

- treating the disclosure and any investigation confidentially;
- an objective, fair and independent investigation process, and regular updates regarding the progress of investigation;
- being afforded the opportunity to reply to any allegations or proposed adverse findings, and have sufficient information provided to understand those allegations or findings and be able to respond; and
- access to TasNetworks' employee assistance services.



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