

Approved by: Aaron Hair
Position: Director
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Reviewed: 07/04/2026

Signature: 

ETHOS BUILDING PTY LTD

WHISTLEBLOWER POLICY

Ethos Building & Restoration
ABN 49 615 519 812

National Support Centre
13/75 Lorimer Street, Docklands VIC 3008

Contact
enquiries@ethosbuilding.com.au
24/7 National Support: 1300 238 467





1. PURPOSE

Ethos Building Pty Ltd is committed to maintaining high standards of ethical behaviour, integrity, and compliance with all applicable Commonwealth, State and Territory laws across Australia.

This policy provides a framework for:

- Reporting misconduct and disclosable matters
- Protecting whistleblowers
- Ensuring fair and confidential investigation processes
- Supporting individuals involved in disclosures

This policy will be communicated to officers and employees and made readily accessible to relevant stakeholders.

2. APPLICATION

This policy applies to:

- All employees, officers, and directors
- Contractors and suppliers (and their employees)
- Associates and relatives/dependents of the above

3. ELIGIBLE WHISTLEBLOWERS

Eligible whistleblowers include current and former:

- Employees and officers of Ethos Building Pty Ltd
- Individuals who supply goods or services to Ethos Building Pty Ltd (and their employees)
- Associates of Ethos Building Pty Ltd; and
- Relatives, dependents or spouses of any of the above persons.

4. REPORTING CHANNELS

Disclosures can be made to eligible recipients using any of the following channels.

Eligible recipients are authorised to receive whistleblower disclosures and must handle them in accordance with this policy.

Internal

- Managing Director
- National Operations Manager

External

- Contact email listed in Section 20
- 1300 238 467 (request to speak with the Managing Director or National Operations Manager)
- By mail to: 13/75 Lorimer Street, Docklands VIC 3008 (marked “Confidential – Whistleblower”)
- Online reporting form (Director Feedback Form – [Click here](#))

Regulators

- ASIC
- Australian Taxation Office
- Relevant workplace safety authorities
- Law enforcement agencies and other prescribed regulators

Disclosures may be made anonymously. Where a disclosure is made anonymously, Ethos will, where possible, maintain a mechanism for ongoing communication.

5. DISCLOSABLE MATTERS

A disclosable matter is information where there are reasonable grounds to suspect misconduct or an improper state of affairs.

A whistleblower does not need to prove the allegations, only to have reasonable grounds to suspect misconduct.

Examples include:

- Fraud, corruption, or bribery
- Financial misconduct or misappropriation
- Breaches of Corporations Act or taxation laws
- Serious breaches of workplace laws
- Unsafe work practices or WHS breaches
- Conduct posing risk to public safety or the environment
- Building and construction non-compliance (including breaches of applicable laws, codes, licensing or regulatory requirements)

Personal Work-Related Grievances

Personal grievances are generally not covered unless they involve:

- Victimisation
- Systemic issues

- Breaches of employment or safety laws

6. PROTECTION FROM DETRIMENT

Ethos strictly prohibits victimisation.

Detrimental conduct includes:

- Dismissal or demotion
- Harassment or discrimination
- Damage to reputation or finances

Disciplinary action will be taken against any person engaging in victimisation.

7. SUPPORT FOR WHISTLEBLOWERS

Support measures include:

- Option to have a support person
- Regular check-ins during and after investigation

Ethos is committed to psychological safety and fair treatment.

8. INVESTIGATION PROCESS

Ethos will assess and investigate disclosures in a fair, confidential and timely manner.

Initial Handling

- Disclosures will be received by an eligible recipient and acknowledged where contact details are available.
- Disclosures may be made anonymously and will be assessed on the information provided.

Assessment and Referral

- The eligible recipient will assess the disclosure and determine the appropriate course of action.
- Where required, the matter will be referred to an appropriately authorised person or external provider to conduct or assist with the investigation.

Investigation

Investigations may include:

- Obtaining further information from the whistleblower (where possible)
- Identifying and interviewing relevant witnesses
- Reviewing relevant documents, records and communications
- Assessing the substance of the allegations

Investigations will be conducted by persons who are independent and free from any actual or perceived conflict of interest.

Confidentiality and Identity

- The identity of the whistleblower will be kept confidential in accordance with applicable law.
- Where a whistleblower has consented, their identity may be disclosed to persons involved in the investigation on a need-to-know basis.
- If a whistleblower remains anonymous, Ethos will continue the investigation to the extent reasonably practicable.

Outcome

- Findings will be documented and appropriate actions will be taken based on the outcome of the investigation.
- Where appropriate and lawful, the whistleblower will be informed of the outcome.

Ongoing Support and Records

- Records of disclosures and investigations will be securely maintained and accessible only to authorised personnel.
- Where appropriate, Ethos may provide ongoing support to individuals involved in the process.

9. CONFIDENTIALITY & PRIVACY

Ethos will:

- Protect the identity of whistleblowers in accordance with applicable law
- Store records securely
- Comply with Privacy Act 1988 (Cth) and Australian Privacy Principles

Information will only be shared on a need-to-know basis.

10. CASE MANAGEMENT & INVESTIGATION PRINCIPLES

All disclosures will be:

- Logged securely
- Assessed based on risk and severity
- Assigned appropriately

Investigations will be conducted in accordance with:

- Procedural fairness
- Confidentiality
- Timeliness

Investigators must not have any actual or perceived conflict of interest.

11. REPORTING & CONTINUOUS IMPROVEMENT

Ethos will:

- Maintain anonymised metrics
- Report trends to management
- Implement corrective actions

12. ACCESSIBILITY & SPEAK-UP CULTURE

Ethos promotes a culture where individuals feel safe and supported to speak up about concerns.

This includes encouraging open communication, ensuring accessible reporting channels, and reinforcing that disclosures will be taken seriously and handled appropriately.

13. RECORD KEEPING

Records will be securely stored and retained appropriately.

14. CONTACTS

Managing Director
Ethos Building Pty Ltd
aaron.hair@ethosbuilding.com.au

National Operations Manager
Ethos Building Pty Ltd
scott.adderley@ethosbuilding.com.au