

Whistleblower Policy

1. Purpose

Locality Planning Energy (LPE) is committed to maintaining a high standard of integrity, investor confidence and good corporate governance. This Whistleblower Protection Policy forms part of LPE's risk management strategy and is a key document in the Ethical Policy suite.

2. What does this Policy do?

A person may have concerns about conduct within LPE which they consider to be potentially illegal, unethical or improper, but they may feel reluctant to raise these concerns because of the potential for adverse repercussions. The aim of this Policy is to encourage people to raise concerns via a mechanism that is objective, confidential, independent and provides them with protection from reprisal. Please note, that under this Policy people:

- Are encouraged to report their concerns, either openly or anonymously.
- They will be afforded confidentiality unless they indicate (or the law requires) otherwise.
- Their concerns will be properly investigated with the objective of determining the truth and correcting any wrongdoing where possible.
- They will be advised, to the extent practicable, of the outcome of the investigation.
- As long as there is a basis for their concerns, and that they have acted in good faith and without malicious intent, they will not be adversely affected because of their action in reporting their concerns.

3. Who does this Policy apply to?

This Policy applies to:

- Current and former LPE employees.
- Officers (including Directors) of LPE.
- Contractors.
- Suppliers.
- Unpaid workers.
- Relatives and dependents of any of the individuals detailed above.

4. Policy on Whistleblowing

All LPE employees have a responsibility to help detect, prevent, and report instances of suspicious activity or wrongdoing. These instances are referred to as a Reportable Matter. Employees are encouraged to raise concerns about any relevant issue or suspicion as early as possible with their immediate manager. Serious matters will be escalated to senior management.

LPE is committed to ensuring that all employees have a safe, reliable, and confidential mechanism through which they can report any Reportable Matters. Employees should report a Reportable Matter under this Policy if they:

- Have previously reported a Reportable Matter and they were not satisfied with the response to the report.
- Feel unable to raise the Reportable Matter with their manager, either because their manager is the subject of the report or because they have another reason to believe that their manager is unlikely to deal with the report properly.

5. Whistleblower Investigations Officer

LPE's HR officer is appointed as a Whistleblower Investigations Officer (WIO) with powers and duties consistent with the Australian Standard on Whistleblower Protection Programs.

6. What is a 'Reportable Matter'?

A Reportable Matter is any actual or suspected concern involving the following conduct, or the deliberate cover-up of such conduct:

- Financial irregularity.
- Corrupt conduct.
- Criminal conduct.
- Failure to comply with any legal or regulatory obligation.
- Unfair or unethical dealing with a customer.
- Unethical or other serious improper conduct, including breaches of LPE policies.
- Misconduct, or an improper situation or circumstances.
- Danger to the public; and
- Offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more.

7. How to Report

Any report under this Policy can be made via any of the following, noting it may depend on the matter and the person who is the subject of the matter:

- The relevant departmental manager.
- The Head of Risk and Compliance.
- LPE's HR officer (WIO).
- LPE's independent Auditors.
- The CEO.
- The COO.
- The Chairman.

- Via LPE's secure and anonymous Whistleblower email address, hr@localityenergy.com.au (which is monitored by LPE's HR officer).

A person may bypass someone in the above list if that person is the subject of the report or if the Whistleblower has reason to believe that the individual is unlikely to deal with the report appropriately. Reports can be submitted anonymously if this is preferred, however this may impact the capacity of LPE to investigate the matter properly and to communicate progress about the report.

Nothing in this Policy should be taken as restricting a Whistleblower from reporting any matter or providing any information to a regulator, LPE's auditor or a member of the risk and compliance team or any other person in accordance with any relevant law, regulation, or other requirement.

8. Action required when a report is made

The person to whom a report is made under this Policy must do the following:

- Ensure that the matter is properly investigated by the person nominated (who in this instance is the HR officer).
- Give particulars of the report that has been submitted to the CEO, the COO and LPE's Chairman (if applicable and the report does not involve these individuals).

9. Investigation Process

Investigation processes will vary depending on the precise nature of the conduct being investigated. The objective of the investigation is to determine whether the concerns can be substantiated, with a view to rectifying any wrongdoing that is discovered to the extent possible. The investigation will be independent, objective, thorough and fair. The investigation will be compliant with the principles set out in the Australian Standard on Whistleblower Protection Programs.

10. Communication

The WIO will keep the employee informed of the outcome of the investigation arising from the report, subject to considerations of the privacy of anyone who is the subject of the Reportable Matter and normal confidentiality requirements. Where practicable, the employee will be provided with initial feedback within a week of making the report, and any further feedback on a fortnightly basis as the matter progresses.

11. Protection

The person to whom a report is made under this Policy may, by agreement, disclose the identity of the Whistleblower to the WIO, but will otherwise keep the Whistleblower's identity confidential. They will ensure that all files relating to the report are kept secure, and that information received is held in confidence and is only disclosed to a person not connected with the investigation if:

- The Whistleblower has been consulted and consents to the disclosure; or
- It is required or permissible by law; and

- It is possible that someone might deduce the Whistleblowers identity without there having been a breach of confidentiality, if the nature of the report points to one individual having made it, or otherwise as a consequence of the nature of the investigatory process.

LPE recognises that “Whistleblowing” can be a very stressful and difficult thing to do. Provided that the Whistleblower is acting in good faith and that they have not themselves engaged in serious misconduct or illegal conduct, to the maximum extent possible they will not be subject to disciplinary action by LPE in relation to any Reportable Matters. LPE will safeguard interests, having regard to this Policy, the Australian Standard on Whistleblower Protection Programs, and any other applicable policies and laws.

LPE will take whatever action is possible consistent with this Policy to make sure that the Whistleblower is not personally disadvantaged for making a report, whether by dismissal, demotion, any form of harassment, discrimination, or any form of current or future bias. If the Whistleblower believes they have been the subject of any such action as a consequence of making a report, and the matter cannot be resolved by management, the matter will be referred to LPE’s Chairman.

Any person found in breach of the provisions in this Policy will be subject to disciplinary procedures, up to and including the termination of employment or engagement with LPE.

12. False Reporting

A false report of a Reportable Matter could have significant effects on LPE’s reputation and the reputations of other staff members and could also cause considerable waste of time and effort. Any deliberately false reporting of a Reportable Matter, whether under this Policy or otherwise, will be treated as a serious disciplinary matter.

13. Records

LPE’s HR officer will maintain a record of all whistleblowing incidents and actions taken under this Policy, so that the Policy can be periodically reviewed.

14. Questions

Any questions about this Policy or Whistleblower protection issues should be directed to LPE’s HR officer or the Head of Risk and Compliance.

15. Review

LPE Policies are subject to annual reviews, as well as review in accordance with applicable legislative and internal changes and/or requirements.