

EVENT

HOSPITALITY & ENTERTAINMENT

WHISTLEBLOWER PROTECTION POLICY

1. COMMITMENT TO ETHICAL BEHAVIOUR

Event Hospitality & Entertainment Limited (EVENT) is committed to a culture of high corporate compliance and high ethical behaviour. The ethical values of the company are illustrated to all employees in the *EVENT Code of Ethics and Business Conduct*. This code outlines that EVENT believes in the strong ethical values of integrity and business honesty.

2. STATEMENT OF SUPPORT TO WHISTLEBLOWERS

EVENT is committed to the aims and objectives of an effective Whistleblower protection policy.

EVENT recognises the value of transparency and accountability in its administrative and management practices, and supports the making of disclosures.

EVENT does not tolerate the taking of reprisals against those who come forward to disclose such conduct.

3. AVENUES TO DISCLOSE CONDUCT

This Policy contains two Parts under which you may make a disclosure:

- (a) Part 1 contains the mandatory requirements prescribed by the *Corporations Act 2001* (Cth) (**Corporations Act**) and applies to disclosures about matters referred to in paragraph 2.1 of Part 1 (**Corporations Act Disclosures**); and
- (b) Part 2 applies to disclosures about matters that are not Corporations Act Disclosures (**Other Disclosures**).

Part 1 refers to the procedures, and uses the terminology, contained in the legislation. Part 2 adopts different procedures and uses some different terminology.

This Policy does not relate to personal work-related grievances – subject to the exceptions set out in Section 2.2 of Part 1 below – which should be dealt with in accordance with the relevant policy for employment related concerns.

4. OTHER

Any breach of this Policy may result in disciplinary action, up to and including termination of employment.

The content of this Policy may be reviewed from time to time by the EVENT Company Secretary. In particular, the Company Secretary may have regard to complaints, reports and



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EVENT HOSPITALITY & ENTERTAINMENT LIMITED – WHISTLEBLOWER PROTECTION POLICY

recommendations made regarding compliance with this Policy, including the investigations undertaken and the impact on whistleblowers personally. Any amendments to the Policy shall be approved by the EVENT Audit and Risk Committee.

This Policy is not a term of any contract, including any contract of employment. This Policy may be varied by EVENT from time to time, in its absolute discretion.

Part 1: Disclosures Protected by Legislation

1. AIM

The Corporations Act and the *Tax Administration Act 1953* (Cth) provide for protections for eligible whistleblowers (**Statutory Whistleblower Protection Scheme**).

The purpose of this Part is to set out:

- (a) information about the types of disclosures that qualify for protection under the Statutory Whistleblower Protection Scheme;
- (b) information about the protections available to whistleblowers, including protections under the Statutory Whistleblower Protection Scheme;
- (c) information about to whom disclosures that qualify for protection under the Statutory Whistleblower Protection Scheme may be made, and how they may be made;
- (d) information about how EVENT will support whistleblowers under the Statutory Whistleblower Protection Scheme and protect them from detriment;
- (e) information about how EVENT will investigate disclosures that qualify for protection under the Statutory Whistleblower Protection Scheme;
- (f) information about how EVENT will ensure fair treatment of employees of who are mentioned in disclosures that qualify for protection, or to whom such disclosures relate under the Statutory Whistleblower Protection Scheme; and
- (g) information about how this policy is to be made available to officers and employees of EVENT.

2. SCOPE OF THE WHISTLEBLOWER PROTECTION SCHEME

2.1 What disclosures are protected?

The following are the primary types of disclosures that 'qualify' for protection under the Statutory Whistleblower Protection Scheme:

- (a) disclosures by an 'eligible whistleblower' to Australian Securities and Investments Commission (**ASIC**), Australian Prudential Regulation Authority (**APRA**), the Commissioner of Taxation, a prescribed Commonwealth authority or a legal practitioner; or
- (b) disclosures by an 'eligible whistleblower' to an 'eligible recipient',
if:
 - (c) the discloser has 'reasonable grounds';
 - (d) to 'suspect';
 - (e) that the disclosed information:
 - (i) concerns misconduct or an improper state of affairs or circumstances in relation to EVENT or one of its related bodies corporate; or

- (ii) indicates that EVENT, a related body corporate or one of its or their officers or employees has engaged in conduct that constitutes an offence against the Corporations Act or other specified financial services legislation, an offence against other Commonwealth legislation that is punishable by imprisonment for 12 months or more or represents a danger to the public or the financial system.

As noted below, it does not apply to personal work-related grievances though, unless an exception applies.

2.2 Personal work-related grievances

A disclosure does not qualify for protection under the Statutory Whistleblower Protection Scheme to the extent that the information discloses concerns a personal work-related grievance of the eligible whistleblower unless:

- (a) it concerns conduct, or alleged conduct, referred to in paragraph 2.1(e)(ii) of this Policy;
- (b) it concerns a contravention, or an alleged contravention, of clause 3.3 of this Statutory Whistleblower Protection Scheme (Victimisation); or
- (c) it has significant implications for EVENT, or another regulated entity, beyond the whistleblower.

For the purposes of the Statutory Whistleblower Protection Scheme, a disclosure is a '*personal work-related grievance*' if:

- (a) the information concerns a grievance about any matter in relation to the eligible whistleblower's employment, or former employment, having (or tending to have) implications for the eligible whistleblower personally; and
- (b) the information:
 - (i) does not have significant implications for EVENT, or another regulated entity, that do not relate to the discloser; and
 - (ii) does not concern conduct, or alleged conduct, referred to in paragraph 2.1(e)(ii) of this Policy.

2.3 Public interest disclosures

There is an additional category of disclosures called 'public interest disclosures' that qualify for protection under the Statutory Whistleblower Protection Scheme. These can only be made to journalists and members of Parliament but only if the eligible whistleblower complies with strict requirements, including:

- (a) the eligible whistleblower has made a qualifying disclosure to ASIC, APRA, or a prescribed Commonwealth authority;
- (b) at least 90 days has passed since the qualifying disclosure was made;
- (c) the eligible whistleblower has reasonable grounds to believe that action has not been taken in relation to the qualifying disclosure and that making a public interest disclosure would be in the public interest;

- (d) prior to making the public interest disclosure, notice is given to the body that received the qualifying disclosure (that is, ASIC, APRA, or a prescribed Commonwealth authority); and
- (e) no more information is disclosed than necessary to inform the journalist or member of Parliament of the alleged misconduct or improper state of affairs or circumstances, or other conduct falling within the scope of the Whistleblower Protection Scheme.

2.4 Emergency Disclosures

There is also an additional category of disclosures called 'emergency disclosures' that qualify for protection under the Statutory Whistleblower Protection Scheme. These can only be made to journalists and members of Parliament and only if the discloser complies with the following strict requirements, including:

- (a) the eligible whistleblower has made a qualifying disclosure to ASIC, APRA or a prescribed Commonwealth authority;
- (b) the eligible whistleblower has reasonable grounds to believe that information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment; and
- (c) prior to making the emergency disclosure, notice is given to the body that received the qualifying disclosure (that is, ASIC, APRA, or a prescribed Commonwealth authority); and
- (d) no more information is disclosed than necessary to inform the journalist or member of Parliament of the substantial and imminent danger.

2.5 Who is an 'eligible whistleblower'?

The following persons are capable of being 'eligible whistleblowers' under the Statutory Whistleblower Protection Scheme:

- (a) any officer of EVENT;
- (b) any employee of EVENT; and
- (c) any person who supplied goods or services to EVENT or its employees;

This concept of 'eligible whistleblowers' extends to any persons who previously held any of the above positions or functions. It also extends to family members of these persons including relatives and dependants.

2.6 Who is an 'eligible recipient' within EVENT?

Under the Statutory Whistleblower Protection Scheme, an 'eligible recipient' will be:

- (a) any of EVENT's officers or senior managers;
- (b) EVENT's auditors or actuaries; or
- (c) any person authorised by EVENT to receive qualifying disclosures.

For the purposes of this Statutory Whistleblower Protection Scheme, the following people are authorised to receive qualifying disclosures:

- (a) David Stone - EVENT Company Secretary on (02) 9373 6609 or by e-mail on David_Stone@evt.com; or
- (b) Anny Cheung - EVENT Legal Counsel on (02) 9373 6637 or by e-mail on Anny_Cheung@evt.com.

Where the qualifying disclosure is about either of these people, the eligible recipient will be Mathew Duff, Director of Commercial, on (02) 9373 6701 or by email on Mathew_Duff@evt.com.

KPMG FairCall is also authorised to receive qualifying disclosures. KPMG FairCall can be contacted as follows:

- (c) By telephone: 1800 500 965 (Australia), 0800 100 526 (New Zealand) or 0800 181 3622 (Germany);
- (d) By email: faircall@kpmg.com.au;
- (e) Online at <http://faircall.kpmg.com.au/> (Australia and New Zealand) or <http://www.thornhill.co.za/kpmgethicslinereport> (Germany);
- (f) By mail addressed to The FairCall Manager, KPMG Forensic, PO Box H67, Australia Square, Sydney NSW 1213, Australia; or
- (g) By fax: +61 2 9335 7466.

This service is provided by KPMG Australia. This service is an independently monitored, external, anonymous service for you to report concerns of possible fraudulent or unethical behaviour to EVENT Hospitality & Entertainment Limited. Where KPMG Australia collects personal information as part of this service, it is provided in accordance with KPMG Australia's Privacy Statement, which is available at <http://www.kpmg.com/au/faircallprivacy>.

3. PROTECTIONS

3.1 Confidentiality

Strict confidentiality obligations apply in respect of any disclosures that qualify for protection under the Statutory Whistleblower Protection Scheme.

Unless the eligible whistleblower consents, their identity or any information that may lead to the disclosure of their identity must not be disclosed by the eligible recipient to any other person (subject to the exceptions set out below).

To avoid inadvertent breaches of confidentiality obligations under the Statutory Whistleblower Protection Scheme, eligible whistleblowers are encouraged to consent to their identity being disclosed (if they feel comfortable to do so). Being able to share an eligible whistleblower's identity will also assist in an efficient investigation of the matters that an eligible whistleblower discloses.

However, under the Statutory Whistleblower Protection Scheme:

- (a) anonymous disclosures are still capable of being protected (though it may be difficult to investigate these disclosures effectively);
- (b) if a discloser does not consent to their identity being disclosed to any other persons, it will still be lawful to:
 - (i) disclose their identity to:
 - (A) ASIC, APRA, the Australian Federal Police or the Commissioner of Taxation;
 - (B) a legal practitioner for the purposes of obtaining advice about the disclosure; or
 - (C) to a body prescribed by the regulations,
 - (ii) disclose information that may lead to the identification of the individual if this is reasonably necessary for the purpose of investigating the qualifying disclosure.

3.2 EVENT cannot pursue action against the discloser

EVENT will be prohibited from pursuing any civil, criminal, administrative or contractual action against an eligible whistleblower in relation to any protected disclosure that they make.

3.3 Victimization - Detriments and threats of detriment prohibited

The Statutory Whistleblower Protection Scheme makes it unlawful for:

- (a) a person to engage in conduct against another person that causes or will cause a detriment:
 - (i) in circumstances where the person believes or suspects that the other person or a third person made, may have made, proposes to make or could make a qualifying disclosure; and
 - (ii) if the belief held by that person is the reason or part of the reason for their conduct.

Threats of detriments will also be unlawful if:

- (a) the person making the threat intended to cause fear that a detriment would be carried out or was reckless as to whether the person against who it was directed would fear the threatened detriment being carried out; and
- (b) the threat was made because the person makes or may make a qualifying disclosure.

The meaning of 'detriment' is very broad and includes:

- (a) dismissing an employee;
- (b) injuring an employee in their employment;
- (c) altering an employee's position or duties to their disadvantage;
- (d) discriminating between an employee and other employees;
- (e) harassing or intimidating a person;

- (f) harming or injuring a person;
- (g) damaging a person's property, reputation, business or financial position; and
- (h) any other damage to a person.

3.4 Court orders

Courts are given broad scope to make orders remedying a detriment or threatened detriment under the Statutory Whistleblower Protection Scheme. These include to order injunctions, compensation orders (including against individual employees and their employers), reinstatements, exemplary damages, and the making of apologies. Civil and criminal sanctions also apply to breaches of the Statutory Whistleblower Protection Scheme.

3.5 Are there any other protections that are available?

Amongst other things, disclosures may also amount to the exercise of a workplace right by either an EVENT employee or contractor. EVENT and its employees are prohibited under the *Fair Work Act 2009* (Cth) from taking adverse action against employees or contractors because they exercised or propose to exercise any workplace rights.

4. RESPONSIBILITIES

It is the responsibility of all EVENT personnel to be aware of and understand the scope of the Statutory Whistleblower Protection Scheme and the protections that are afforded to eligible whistleblowers, and to comply with the Statutory Whistleblower Protection Scheme's requirements.

5. SUPPORT, INVESTIGATIONS

Whenever an eligible disclosure under the Statutory Whistleblower Protection Scheme is made, EVENT will reiterate the requirements of this Part to any person against whom a disclosure may be made or with whom the eligible whistleblower may work directly to seek to ensure that the protections afforded under the Statutory Whistleblower Protection Scheme are not undermined. Disciplinary action up to and including dismissal may be taken against any person who causes or threatens to cause any detriment against a whistleblower.

In addition, EVENT's Employee Assistant Program (**EAP**) will be available to all whistleblowers and other employees affected by the disclosure should they require that support. If you wish to speak to a counsellor on a confidential basis, please approach your Manager, General Manager or Area Manager for them to provide you with details of the EAP. If you do not feel comfortable approaching the managers, please contact David Phillips, Group Risk Manager on 0418 453 730 or by e-mail on David_Phillips@evt.com and he will arrange access for the EAP.

At the same time, it is crucial that due process be observed before any action is taken against a person against whom a disclosure is made. Such action will only occur where there is cogent evidence of the alleged misconduct, improper state of affairs or circumstances or other conduct falling within the scope of this Part.

Eligible disclosures under the Statutory Whistleblower Protection Scheme will often be investigated internally by EVENT. However, it may sometimes be appropriate for investigations to be carried out externally on behalf of EVENT. Whether an investigation will be carried out externally will depend on the seriousness of the allegations and who they relate to.

6. VEXATIOUS DISCLOSURES

A discloser will only be protected under the Statutory Whistleblower Protection Scheme if they have **objectively reasonable** grounds to suspect that the information that they disclose concerns misconduct or an improper state of affairs or circumstances or other conduct falling within the scope of this Part.

The protections under the Statutory Whistleblower Protection Scheme will not extend to vexatious complaints. If any investigation of a disclosure demonstrates that it was not made on objectively reasonable grounds, it will not be protected.

Depending on the circumstances, it may be appropriate for EVENT to take disciplinary action against any person who does not have reasonable grounds for their disclosure. Such action may include the termination of employment.

7. OTHER MATTERS

This Part is not intended to go beyond the legislation, it is not a term of any contract, including any contract of employment and does not impose any contractual duties, implied or otherwise, on EVENT.

Part 2: Other Disclosures

1. OBJECTIVE OF THIS PART

This Part establishes a system for the reporting of “Reportable Conduct” (“**Report**”) that falls outside Part 1 which relates to Corporations Act Disclosures.

This Part applies to all of EVENT's subsidiaries (including foreign subsidiaries to the extent that it is not inconsistent with local laws).

The system encourages employees to report their concerns preferably openly, but if necessary enables disclosures to be made anonymously to an EVENT Incident Manager or using the KPMG FairCall Service (see section 3 below).

This Part also provides the guidelines for the support and protection of individuals making Reports, and further establishes a system for the matters disclosed to be investigated, and rectifying action to be taken.

2. REPORTABLE CONDUCT

Under this Part, “**Reportable Conduct**” is conduct by a person or persons connected with an EVENT Group entity which, in the view of a whistleblower acting in good faith, is:

- (a) dishonest;
- (b) fraudulent;
- (c) corrupt;
- (d) illegal (including theft, drug sale/use, violence or threatened violence and criminal damage against property);
- (e) discriminatory;
- (f) sexual harassment;
- (g) failure to comply with any obligation under state legislation or local authority by-laws or any Commonwealth legislation that is not covered by Part 1;
- (h) unethical (i.e. including a breach of the EVENT Code of Ethics and Business Conduct);
- (i) other serious improper conduct (including gross mismanagement, serious and substantial waste or repeated breaches of administrative procedures);
- (j) an unsafe work-practice;
- (k) not in compliance with EVENT policies;
- (l) any other conduct which may cause financial or non-financial loss to EVENT or the consolidated entity or be otherwise detrimental to the interests of EVENT or the consolidated entity, or any of its employees; or
- (m) deliberate concealment of the above.

For the purpose of this Part a “whistleblower” is a person, being a director, manager, employee or contractor of EVENT or a subsidiary of EVENT, where the person is apprehensive about raising his/her concern because of the fear of possible adverse repercussions to him/her in relation to Reportable Conduct and who makes a Report under this Part.

This Part and the procedures outlined within this Part are not designed to deal with personal work-related grievances or Corporations Act Disclosures.

Any report treated in accordance with this Part must be for one of Reportable Conduct as outlined above. All general employment complaints or grievances will be forwarded to the respective manager to address.

EVENT has complete discretion to deal with a disclosure under this Part as it sees appropriate.

Any Corporations Act Disclosures should be dealt in accordance with Part 1 of this Policy.

3. REPORTING PROCEDURES

3.1 Any person who has reasonable grounds to suspect that Reportable Conduct has occurred is encouraged to report that suspicion in one of the following ways.

(a) By contacting either of the **two EVENT Incident Managers**, being;

(i) David Stone - EVENT Company Secretary on (02) 9373 6609 or by e-mail on David_Stone@evt.com; or

(ii) Anny Chung - EVENT Legal Counsel on (02) 9373 6637 or by e-mail on Anny_Cheung@evt.com.

(b) Where the Report is about an EVENT Incident Manager, the Report should be made to Mathew Duff, Director of Commercial, on (02) 9373 6701 or by email on Mathew_Duff@evt.com. In that case, references to the "EVENT Incident Manager" in this Policy are to that person.

3.2 Subject to the requirements of section 4.1 below (Receiving and Accepting a Report), all Reports received and accepted by an EVENT Incident Manager under this Part will immediately be discussed with the EVENT Chief Executive Officer (Ms Jane Hastings), unless the Report concerns the EVENT Chief Executive Officer in which case the Report will be discussed with the EVENT Chairman (Mr Alan Rydge) and / or the Lead Independent Director (Mr Peter Coates), as appropriate. The EVENT Chief Executive Officer (or Chairman and Lead Independent Director, as appropriate) will then ensure that the EVENT Group responds appropriately to the Report in accordance with Section 4 below.

3.3 EVENT would prefer that whistleblowers make a Report openly and disclose their identity. However, under this Part whistleblowers can make a Report anonymously.

3.4 The whistleblower can make Reports in writing either by:

(a) post marked as follows:

Private and Confidential – to be opened by addressee only
David Stone or Anny Cheung
GPO Box 1609
SYDNEY NSW 2001

or

(e) e-mailing alert@evt.com.

Reports made by post, email or using the Alert Line will generally be reviewed once a week by one or both of the EVENT Incident Managers, so there may be a delay in responding to you.

Note that Reports received by the EVENT Incident Managers by post or email and Accepted in accordance with section 4.1 below will immediately be discussed with the EVENT Chief Executive Officer, unless the Report concerns the EVENT Chief Executive Officer, in which case the Report will be discussed with the Chairman or Lead Independent Director as set out in section 3.2 above.

Whistleblowers should be aware that it will be more difficult to investigate and take action in relation to Reportable Conduct that is made anonymously and maintaining the anonymity of the whistleblower's identity may be difficult where the nature of the Reportable Conduct points to a particular individual or individuals having made it or where some disclosure is necessary as part of the investigation process.

Posters detailing how employees can report incidents of concern will generally be displayed on the staff noticeboard at every cinema, hotel or office that EVENT or one of its subsidiaries operates from.

3.5 Reports can also be made by using the **KPMG FairCall** whistleblowing service. KPMG FairCall can be contacted as follows:

- (a) By telephone: 1800 500 965 (Australia), 0800 100 526 (New Zealand) or 0800 181 3622 (Germany);
- (b) By email: faircall@kpmg.com.au;
- (c) Online at <http://faircall.kpmg.com.au/> (Australia and New Zealand) or <http://www.thornhill.co.za/kpmgethicslinereport> (Germany);
- (d) By mail addressed to The FairCall Manager, KPMG Forensic, PO Box H67, Australia Square, Sydney NSW 1213, Australia; or
- (e) By fax: +61 2 9335 7466.

This service is provided by KPMG Australia. This service is an independently monitored, external, anonymous service for you to report concerns of possible fraudulent or unethical behaviour to EVENT Hospitality & Entertainment Limited. If your matter does not relate to such issues please contact the EVENT Incident Managers or report the matter in accordance with sections 3.1(a) or 3.3 respectively.

Where KPMG Australia collects personal information as part of this service, it is provided in accordance with KPMG Australia's Privacy Statement, which is available at <http://www.kpmg.com/au/faircallprivacy>.

4. PROCEDURES FOLLOWING DISCLOSURE

The following process will generally be followed in relation to suspected Reportable Conduct:

4.1 Receiving and Accepting a Report

On receiving a Report, the relevant EVENT Incident Manager will decide whether to accept the Report and whether the Report is about Reportable Conduct for the purposes of this Policy.

Subject to what is said about Corporations Act Disclosures below, the EVENT Incident Manager may decline to accept a Report if they consider that:

- (a) the alleged conduct is not Reportable Conduct under this Part;
- (b) the Report is not made in good faith or is frivolous, vexatious or malicious;
- (c) the Report is made anonymously and there is insufficient information to allow the EVENT Incident Manager to investigate the matter;
- (d) the subject matter of the Report has been satisfactorily dealt with or resolved previously through the procedures set out in this Policy (unless another alleged incident has occurred since);
- (e) the subject matter of the Report has been satisfactorily dealt with or resolved through another grievance, reporting, complaint or claims procedure. The EVENT Incident Manager will decline to accept a Report if the Report is in effect an 'appeal' from a decision already made by EVENT under another grievance, reporting, complaint or claims procedure; or
- (f) some other more appropriate grievance, reporting, complaint or claims procedure in relation to the subject matter of the Report is available to the whistleblower – for example, the matter should be reported through the occupational health and safety reporting mechanisms or other grievance procedures.

4.2 Investigations

Where the EVENT Incident Manager has accepted a Report under this Policy and considers the subject matter is significant, the EVENT Incident Manager will generally conduct an investigation.

However, the EVENT Incident Manager has the discretion to determine that – in all the circumstances - it is not appropriate or necessary to conduct an investigation.

The object of any investigation is to collate information relating to the allegation as quickly as possible, to consider the information collected and to draw conclusions based on the evidence in a manner that is objective and impartial.

The EVENT Incident Manager will determine the appropriate method for any investigation to occur. In appropriate cases, and on a basis that appropriately protects confidentiality, this may involve:

- (a) The EVENT Chief Executive Officer (or Chairman and / or Lead Independent Director).
- (b) The Group Internal Audit Manager, based on information provided by the EVENT Incident Manager.
- (c) An appropriate external investigator such as lawyers or accountants.

4.3 Reporting

At the conclusion of their investigations, the Group Internal Audit Manager or the external investigator (if they are involved) may prepare a report of the findings to the EVENT Incident Manager and EVENT Chief Executive Officer (or Chairman and / or Lead Independent Director).

4.4 Actions Taken

Subject to any statutory confidentiality limitations, at the conclusion of the investigation the relevant EVENT Incident Manager will notify and may prepare a report to the EVENT Board.

Where the final report indicates that the Reportable Conduct has occurred, the final report will include recommendations for steps to be taken to prevent the conduct from occurring in the future, as well as any action that should be taken to remedy any harm or loss arising from the conduct including disciplinary proceedings against the person responsible for the conduct and the referral of the matter to appropriate authorities as is deemed necessary.

4.5 Communications to the Whistleblower

Unless it is inappropriate to do so, the relevant EVENT Incident Manager will ensure that the whistleblower is kept informed of the outcomes of the investigation of his/her allegations, subject to the considerations of privacy of those against whom allegations are made and any other issues of confidentiality.

4.6 Reports made using the KPMG FairCall service

Calls to KPMG's FairCall service will be answered by a trained forensic professional who will interview the caller and obtain all relevant information. KPMG FairCall may decline to accept a Report consistent with the criteria set out in section 4.1 above. KPMG FairCall will then prepare a confidential call Report which is provided to the relevant EVENT Incident Manager for further action to be taken in accordance with this Policy.

4.7 General

Depending on the circumstances, it may be appropriate to depart from the process outlined above.

5. PROTECTION OF THE WHISTLEBLOWER

5.1 General

Wherever possible, EVENT recognises that maintaining appropriate confidentiality is important in ensuring that potential whistleblowers come forward and disclose their knowledge or suspicions about Reportable Conduct in an open and timely manner and without fear of reprisals being made against them.

EVENT will take all reasonable steps to protect the identity of the whistleblower if that is practicable, and will adhere to any statutory requirements in respect of the confidentiality of disclosures made.

However, maintaining confidentiality of the identity of the whistleblower may be difficult where the nature of the Report points to one particular individual having made it or due to the inherent nature of the investigation process. The EVENT Incident Manager may need to discuss with the whistleblower the possibility that other staff may deduce his or her identity without the EVENT Incident Manager having told the individual of the whistleblower's identity.

Where the identity of the whistleblower is to be disclosed, the whistleblower should, where practicable, be informed of this in advance.

The EVENT Incident Manager must ensure that all documentation and information relating to the Report is kept secure.

In appropriate cases, disclosure of the whistleblower or the allegation made by them may be unavoidable, such as if court proceedings result from a disclosure pursuant to this Policy or if the proper investigation of the Report requires such disclosure.

5.2 Reprisals

EVENT will not tolerate any victimisation of a person because they have made a report under this Policy.

However, you will need to appreciate that a complaint is a serious matter and can have serious consequences for the person or persons who are subject to the complaint.

Accordingly, if EVENT concludes that a report is false, vexatious or malicious, then EVENT may consider disciplinary action against the person making the complaint. See **7. FALSE ALLEGATIONS** below.

6. WHISTLEBLOWER'S LIABILITY

A whistleblower remains liable for his or her own conduct that may constitute Reportable Conduct. EVENT has no power to offer any person immunity against prosecution in the criminal jurisdiction, nor does EVENT have any authority to reduce the penalty applicable if the conduct disclosed is criminal.

7. FALSE ALLEGATIONS

EVENT is committed to the protection of genuine whistleblowers against reprisals. However, where it is shown that a person purporting to be a whistleblower has knowingly made a false report, or not made a Report in good faith, of Reportable Conduct (whether accepted as a Report under this Policy or not), then that conduct itself will be considered a serious matter and may render the person concerned subject to disciplinary proceedings (which may include termination of employment).