



Policy Name	AHA Whistleblower Policy
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1. Purpose

- 1.1. Animal Health Australia ("the AHA") is committed to a culture of ethical, transparent and accountable conduct consistent with best-practice standards for not-for-profit (NFP) organisations. This policy provides a safe, secure and accessible mechanism for disclosers to report misconduct, illegal activity or an improper state of affairs without fear of reprisals.
- 1.2. The purpose of this policy is to:
 - Establish clear processes for reporting wrongdoing.
 - Ensure disclosers understand their rights and protections under Whistleblower Laws.
 - Ensure AHA meets its legal obligations under the Corporations Act 2001 and good governance principles.
 - Promote a culture where people feel confident to speak up.
 - Ensure disclosures are dealt with appropriately and on a timely basis.

2. Commencement

- 2.1. This Policy commences operation from 26 March 2026 and replaces all previous AHA Whistleblower policies (whether written or not).

3. Scope and Application

- 3.1. This policy applies to the following persons who make a disclosure in accordance with this policy (who are each a Discloser):
 - Current or former employees (full-time, part-time, casual, fixed-term);
 - Current and former directors and officers;
 - Current and former contractors, consultants, suppliers and volunteers;
 - Associates and representatives acting on behalf of AHA;
 - Spouses, dependants and relatives of any of the above.
- 3.2. Each of these persons is an eligible whistleblower and may make a protected disclosure.
- 3.3. The policy does not form part of any contract of employment or contract for services.

4. Types of Disclosures Protected by Whistleblower Laws

- 4.1. A disclosure is protected by Whistleblower Laws if:
 - the disclosure relates to Protected Matters;
 - the information is disclosed by a Discloser identified in section 3; and

- the disclosure is made to one of the persons identified in section 8.
- 4.2. All of the above 3 conditions must be satisfied for a disclosure to be protected by Whistleblower Laws.

5. Protected Matters (What can be reported)

- 5.1. The types of disclosures which are protected are those where the Discloser has reasonable grounds to suspect that the information disclosed concerns misconduct, or an improper state of affairs or circumstances, in relation to AHA.
- 5.2. The discloser can still qualify for protection under Whistleblower Laws even if their disclosure turns out to be incorrect, provided the disclosure is made honestly and on reasonable grounds.
- 5.3. Protected Matters may include actual or suspected:
- Illegal conduct, such as theft, dealing in, or use of illicit drugs, violence or threatened violence and criminal damage against property;
 - Fraud, money laundering or misappropriation of funds;
 - Offering or accepting a bribe;
 - Misuse of AHA funds or resources.
 - Serious breaches of AHA policy or Codes.
 - Significant risks to public health, safety, the environment, or the financial system.
 - Failure to comply with, or breach of, legal or regulatory requirements; and
 - Engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made, or planning to make, a disclosure.
 - Deliberate concealment of any of the above.

6. Work Related Grievances

- 6.1. The disclosure of information related to a personal work-related grievance is ***not generally protected*** by Whistleblower Laws.
- 6.2. A personal grievance *may still* be protected if:
- it includes information about misconduct; or
 - the discloser suffers detriment for making the disclosure; or
 - legal advice is sought about whistleblower protections.
- 6.3. Personal work-related grievances should be made pursuant to the AHA's Grievance and Complaints Policy.

7. Who May Make Disclosures about Protected Matters?

- 7.1. Each person named in the Scope under clause 3 may make a protected disclosure.
- 7.2. Anonymity

There is no requirement for a Discloser to identify themselves to be protected by Whistleblower Laws. That is, protected disclosures may be made anonymously. A person may choose to remain anonymous while making a disclosure over the course of the investigation and after the investigation is finalised.

A Discloser may refuse to answer questions if they feel that the answer could reveal their identity at any time.

8. Who can a Protected Matter be Disclosed To?

- 8.1. In order to be protected by Whistleblower Laws, the disclosure of a Protected Matter must be made to:
- 8.2. Internal Whistleblowing Officers (in order of escalation):
- a) Chief Executive Officer (CEO)
 - b) Chair of the AHA Board (if the CEO is implicated or insufficiently independent)
- 8.3. The role of the Whistleblowing Officers is to receive reports regarding a Protected Matter.
- 8.4. The Whistleblowing Officers can be contacted at:
- ceo@animalhealthaustralia.com.au or
chair@animalhealthaustralia.com.au
- 8.5. External Eligible Recipients include:
- a) ASIC or APRA or any other Commonwealth body that is prescribed by the Whistleblower Laws (which may include the ATO with respect to taxation matters);
 - b) a legal practitioner for the purposes of obtaining legal advice or representation in relation to Whistleblower Laws;
 - c) an auditor or member of an audit team conducting an audit on AHA or its related bodies corporate; or
 - d) an actuary of AHA.
- 8.6. Public Interest & Emergency Disclosures
- Disclosures to journalists or parliamentarians are protected only if strict statutory criteria are met (e.g., prior reporting to ASIC/APRA, written notice, imminent danger). Disclosers are strongly encouraged to obtain independent legal advice before using this pathway.

9. How to Make a Disclosure

- 9.1. A Discloser may submit a report and any relevant documentation on any protected matter directly to a Whistleblowing Officer as identified in section 8.

10. What Happens After a Report is Made?

- 10.1. Unless the Whistleblowing Officer considers the report to be vexatious or frivolous, the relevant matters will be investigated in accordance with the investigation proceedings outlined in clause 14. If no action is to be taken, the Whistleblowing Officer will inform the person who raised the concern or made the allegations and an explanation as to why no further action will be taken. This outcome will be documented.

11. Confidentiality

- 11.1. Where a disclosure is protected by Whistleblower Laws, the Laws prohibit persons from disclosing the identity of a Discloser or disclosing information that is likely to lead to the identification of the Discloser.
- 11.2. Persons may only disclose the identity of a Discloser with the Discloser's consent or to ASIC, APRA, the AFP or a legal practitioner for the purposes of obtaining legal advice about the Whistleblower Laws.
- 11.3. Persons may also disclose the existence of the Protected Matters (without disclosing the identity of the Discloser) to the extent necessary for the matters to be investigated, provided all reasonable steps are taken to reduce the risk that the Discloser's identity can be discovered.
- 11.4. These disclosures may include disclosures to:
- a) the CEO, Chair of the AHA Board, the Chair of the Audit and Risk Committee or the Chair of the People, Culture and Performance Committee;
 - b) delegates to HR or other managers to make inquiries or to conduct investigations or order external investigations as is deemed appropriate; and
 - c) disclosures to respondents to complaints to ensure that the person/s against whom allegations are made are given the opportunity to respond to any allegations.
- 11.5. If a Discloser does not consent to the limited sharing within AHA of their identity and the information provided by them as needed, this may limit AHA's ability to progress their report and to take any action in relation to their disclosure.

- 11.6. Any breach of these confidentiality protections is illegal and attract significant fines for both individuals and companies.

12. Immunity For Discloser

- 12.1. If a Discloser makes a disclosure protected by Whistleblower Laws, the Discloser cannot be subject to any civil or criminal liability for making the disclosure and cannot be subject to any contractual breach or other civil claim on the basis of the disclosure.
- 12.2. No administrative action (e.g. disciplinary action) can be taken against a person for making a disclosure protected by Whistleblower Laws.
- 12.3. No contract of employment or contract for services can be terminated on the basis that a protected disclosure constitutes a breach of contract.

13. Victimisation Prohibited

- 13.1. Whistleblower Laws prohibit any person or company from:
- a) engaging in any conduct that causes detriment to any person because that person (or another person) made a disclosure, proposes to make or could make a disclosure about a Protected Matter pursuant to Whistleblower Laws; or
 - b) carrying out any threats to cause detriment to any person (whether express or implied threats) because that person (or another person) made a disclosure, proposes to make or could make a disclosure about a Protected Matter pursuant to Whistleblower Laws.
- 13.2. Examples of detrimental conduct include:
- a) dismissing an employee
 - b) injuring an employee in his or her employment
 - c) altering an employee's position or duties to their disadvantage
 - d) discrimination between employees
 - e) harassment or intimidation of a person
 - f) harm or injury to a person, including psychological harm
 - g) damage to a person's property or reputation
 - h) damage to a person's business or financial position
- 13.3. Examples of conduct that is not detrimental in breach of Whistleblower Laws include:
- a) administrative action that is reasonable for the purpose of protecting a Discloser from detriment

- b) managing a Discloser's unsatisfactory work performance if the action is in line with AHA's performance management framework.
- 13.4. Where a person or company engages in breaches of these protections, significant fines apply and persons who are adversely affected may obtain compensation orders from a Court in relation to any detriment caused.
- 13.5. Compensation and other remedies are also available to a Discloser if AHA fails to take reasonable precautions and exercise due diligence to prevent detrimental conduct from occurring.
- 13.6. Persons who have their contracts terminated in contravention of these protections may also have their contracts reinstated by a Court.
- 13.7. If a person believes they have been subject to any prohibited detrimental conduct they may seek legal advice about these matters.

14. Investigations

- 14.1. AHA will refer Protected Matters to its Whistleblowing Officer for investigation to determine whether misconduct or some other improper state of affairs exists.
- 14.2. The Whistleblowing Officer will investigate the relevant matters in a manner compliant with the confidentiality obligations outlined in Section 11 of this policy.
- 14.3. The Whistleblowing Officer may alternatively:
- a) appoint an appropriately qualified and impartial person or entity to investigate the relevant matters; or
 - b) refer Protected Matters directly to ASIC, APRA or the Australian Federal Police.
- 14.4. Whilst every investigation process will differ according to the relevant circumstances, the Whistleblowing Officer will ordinarily ensure that appropriate enquiries are made to determine whether:
- a) the disclosure qualifies for protection;
 - b) the allegations are substantiated; and
 - c) responsive action needs to be taken in order to address any established misconduct or other improper state of affairs.
- 14.5. The timeframe for conducting investigations will differ depending on the complexity of a disclosure and the amount of information provided, however, all disclosures will be investigated sensitively, objectively and as promptly as is reasonably practicable.

- 14.6. The Discloser will be provided with regular updates, assuming the Discloser can be contacted. The frequency and timeframe of updates may vary depending on the nature of the disclosure. Key updates will ordinarily include (but are not necessarily limited to):
- a) that the disclosure has been received;
 - b) when the investigation processes has begun; and
 - c) when the investigation process has concluded.
- 14.7. AHA will aim to ensure the fair treatment of people mentioned in a disclosure. This includes:
- a) Respondents being informed of allegations where appropriate;
 - b) Respondents being given the opportunity to respond;
 - c) Investigations are fair and unbiased;
 - d) Confidentiality protections extend to all involved parties.

15. Supporting Whistleblowers, Providing Fair Treatment and Protection from Detriment

- 15.1. AHA intends to support Disclosers making disclosures about Protected Matters and to put in place procedures to promote fair treatment of Disclosers and protect them from detriment.
- 15.2. This can be achieved by:
- handling disclosures confidentially, where practical and appropriate in the circumstances;
 - ensuring each disclosure is assessed and is subject of an assessment and investigation (if the disclosure qualifies as a Protected Matter);
 - ensuring secure record keeping processes that restrict information to disclosures about Protected Matters to those persons who may receive such information pursuant to this policy;
 - ensuring the Discloser's personal information is redacted and where possible, ensuring the Discloser is referred to in a gender-neutral context, unless the Discloser consents to having their identity disclosed;
 - Providing access to EAP counselling services to all Disclosers. These services may be accessed by contacting Assure Programs 1800 808 374. .
 - Investigating all complaints in accordance with the procedures outlined in this policy.
 - Implementing investigation processes which are procedurally fair to both Disclosers and respondents to allegations.

- In circumstances where a Discloser consents, having an appropriate senior manager or human resources officer monitor the Discloser's treatment in the workplace for relevant periods to ensure no victimisation takes place.
- Where practicable, allowing the Discloser to perform their duties from another location, reassign the Discloser to another role at the same level, make other modifications to the Discloser's workplace or the way they perform their duties to assist in protecting the Discloser from detrimental acts;
- Ensuring all Disclosers are aware of the process for lodging complaints if they believe their identity has been improperly disclosed or if they believe that they have been subject to improper victimisation in breach of this policy;
- Communicating this policy to AHA employees and officers.
- Taking appropriate disciplinary action against any employees or contractors that breach the victimisation or confidentiality provisions of the Whistleblower Laws.

15.3. AHA will look for ways to support all Disclosers who raise a concern, but it will not be able to provide non-employees with the same type and level of support that it provides to its employees. Where this policy cannot be applied to non-employees, AHA will still seek to offer as much support as reasonably practicable.

16. Access to this Policy

- 16.1. This policy will be made available to all AHA employees and officers by the following means:
- On implementation, the policy will be communicated to all employees and officers at an all staff meeting;
 - It will be uploaded to Employment Hero for all employees to consent to having read, understood and will adhere to.
 - It will be uploaded to the policy tab on AHA's SharePoint.
 - It will be disclosed to employees on commencement of employment.
 - To ensure persons outside AHA can access the policy, the policy will also be published on AHA's website.

17. Breaches of this Policy

17.1. All employees and contractors of AHA are required to comply with this policy at all times as well as with Whistleblower Laws.



17.2. Non-compliance with this policy or Whistleblower Laws may result in disciplinary action up to and including termination of employment or termination of a contractor's services.

17.3. Breaches will be managed under AHA's Disciplinary Policy and Procedure.

18. Variations

AHA reserves the right to vary, replace, or terminate this policy at any time.