

Purpose	<p>BPP Institute is committed to the highest standards of conduct and ethical behaviour in all of our business activities and to promoting and supporting a culture of honest and ethical behaviour, corporate compliance and good corporate governance.</p> <p>“Whistleblowing” refers to the act of raising concerns about suspected unethical, illegal, fraudulent or undesirable conduct within our business and BPP Institute is committed to providing protections and measures so that those individuals who make a report may do so confidentially and without fear of reprisal, intimidation or disadvantage.</p> <p>This policy will be made available to officers and employees of BPP Institute via the BPP Institute intranet and on the BPP Institute website.</p>
Scope	<p>This policy applies to all staff, including directors and officers of BPP Institute.</p>
Policy Principles	<p>1. Introduction</p> <p>1.1. This policy relates to the reporting of suspected illegal, unethical, corrupt, fraudulent or undesirable conduct or any breach of BPP Institute’s Code of Conduct.</p> <p>1.2. BPP Institute’s employees, directors and officers who have reasonable grounds to suspect that potential misconduct has occurred within BPP Institute should make a report. Others who may disclose a reportable conduct include former BPP Institute employees, contractors, suppliers (including employees of suppliers), associates, agents, and relatives of such individuals described above. BPP Institute will consider disciplinary action, which may include termination of employment or service engagement if any employee or contractor has caused detriment to another because they have or wish to make a disclosure in accordance with this policy.</p> <p>2. Reportable Conduct</p> <p>2.1. Whistleblowers may make a report under this policy if there is a reasonable ground to suspect a BPP Institute Director, officer, employee, contractor, supplier, agent or any other person with business dealings with BPP Institute has engaged in conduct (Reportable Conduct) which:</p> <p>a. is dishonest, fraudulent or corrupt, including bribery or other activity in breach of the Anti-Corruption, Bribery and Fraud Prevention Policy;</p>

	<ul style="list-style-type: none">b. is an illegal activity (such as theft, violence, harassment or intimidation, criminal damage to property or other breaches of state or federal law);c. is unethical or in breach of BPP Institute’s policies (such as breaches of privacy or confidentiality, dishonestly altering company records or data, obtaining unauthorised or inappropriate personal benefit, adopting questionable accounting practices or wilfully breaching Staff Code of Conduct, Student Code of Conduct or other policies or procedures);d. is potentially damaging to BPP Institute, its employees or a third party; such as unsafe work practices, environmental damage, health risks or abuse of BPP Institute resources or property;e. may cause financial loss to BPP Institute or damage its reputation or be otherwise detrimental to BPP Institute’s interest; orf. involves any other kind of potential misconduct or an improper state of affairs or circumstances or which attracts ‘whistleblower’ protection under the laws of Australia. <p>2.2. Potential misconduct under the scope of Reportable Conduct generally does not include personal work-related grievances.</p> <p>2.3. Reports must be based on reasonable grounds that the information disclosed is true.</p> <p>2.4. There will not be negative consequences if the information turns out to be incorrect, but the whistleblower must not lodge a report based on information they know is inaccurate and misleading.</p> <p>2.5. Wilfully making a false report is considered a serious matter and may result in disciplinary action.</p> <p>3. Personal Work-related Grievances</p> <p>3.1. Personal work-related grievances are not within the scope of this policy and should be raised with the relevant Direct Managers, HR Officer, or the Chief Executive Officer (CEO) in line with the Staff Grievance Policy.</p> <p>3.2. Personal work-related grievances are issues in relation to employment with BPP Institute that have personal implications. Examples of personal work-related grievances include:</p> <ul style="list-style-type: none">a. Conflict(s) with another employee;b. Decision(s) relating to employment status or condition; orc. Decision(s) relating to the termination employment.
--	--

4. Reporting

4.1. For the purpose of this policy and to ensure escalation and timely investigation, reports may be lodged to any one of the following Protected Disclosure Officers if the whistleblower becomes aware of any issue or behaviour which is considered to be Reportable Conduct:

Dr Peter Cartwright, Chief Executive Officer	peter.cartwright@cic.vic.edu.au
Richard Hockney, Chair BPP Institute Board of Directors	richard@rhandassociates.com.au

4.2. Reports may also be posted to c/- Level 4, 108 Lonsdale Street, Melbourne VIC 3000, Australia (marked to the attention of one of the Protected Disclosure Officers).

4.3. While it is BPP Institute's preference that the whistleblower raises reports with the Protected Disclosure Officers, it is important to note that under the Corporations Act 2001 (Cth) (Corporations Act), the whistleblower may also raise the matter with an "officer" or "senior manager" of the company. These are defined in the Corporations Act as "a director, or a senior manager in the company who makes, or participates in making decisions that affect the whole or a substantial part of the business of the company, or who has the capacity to affect significantly the company's financial standing".

5. Anonymous Reports

5.1. Anonymous reports are acceptable under this policy if the whistleblower does not wish to disclose their identity. However, anonymous reports have limitations that may inhibit finding a resolution.

5.2. Proper and appropriate investigations cannot occur due to an inability to gather additional information and this impacts the company's ability to report back on progress and the outcome. As a result, BPP Institute cannot guarantee anonymity in all cases.

5.3. Anonymous reports will be handled consistent with the law and reporting requirements, and the identity of the individual making the claim will be kept confidential to the extent practicable and permitted by law.

6. Investigation

- 6.1. All reports received under this policy will be treated seriously and sensitively. BPP Institute will investigate all matters reported under this policy as soon as practicable after the report has been received.
- 6.2. The Protected Disclosure Officer may investigate the matter directly or may appoint an internal or external Investigation Officer as appropriate, subject to the approval of the CEO.
- 6.3. The investigation will be conducted in an objective and fair manner, and otherwise as is reasonable and appropriate having regard to the nature of the Reportable Conduct and the circumstances surrounding the matter.
- 6.4. In general, as soon as practicable upon receipt of the report, the Protected Disclosure Officer or an Investigation Officer will contact the whistleblower to discuss the investigation process including who may be contacted or other such matters as are relevant to the investigation.
- 6.5. When a report is submitted anonymously, BPP Institute will conduct the investigation and its enquiries based on the information provided to it. Unless there are confidentiality or other reasons not to do so, individuals to whom the disclosure relates will be informed of the allegations at an appropriate time and will be given a chance to respond to the allegations made against them.
- 6.6. Where BPP Institute considers it appropriate to do so, BPP Institute will provide feedback to the whistleblower regarding the progress of the investigation and/or the outcome, subject to considerations of the privacy of those against whom allegations are made.
- 6.7. Where an investigation substantiates a breach of BPP Institute's Staff Code of Conduct, or other internal policies or procedures, appropriate disciplinary action may be taken. This may include, but is not limited to, final written warning, terminating or suspending the employment or engagement of the individual(s) involved in the Reportable Conduct. If the investigation finds that there has been a suspected or actual unlawful act, BPP Institute may refer the matter to the relevant legal authority.

7. Protection of Whistleblowers

- 7.1. BPP Institute is committed to protecting and respecting the rights of persons who make reports, ensuring confidentiality in respect of all matters raised under this policy and ensuring those who make a report are treated fairly and do not suffer a detriment.

	<p>7.2. Protection of identity and confidentiality</p> <p>a. Subject to compliance with legal requirements, upon receiving a report under this policy, BPP Institute will only share the person's identity as a whistleblower or information which is likely to reveal their identity if:</p> <ul style="list-style-type: none">i. Consent is given by the person making the report;ii. the allegation or concern is reported to the Australian Securities and Investments Commission (ASIC), the Australian Prudential Regulation Authority (APRA), the Tax Commissioner or the Australian Federal Police; oriii. the concern is raised with a lawyer for the purpose of obtaining legal advice or representation. <p>7.3. Protection against detrimental conduct</p> <p>a. BPP Institute is committed to ensuring confidentiality and that those who make a report are treated fairly and do not suffer detriment. Detrimental treatment includes dismissal, demotion, harassment, discrimination, disciplinary action, bias, threats or other unfavourable treatment connected with making a report.</p> <p>b. If a whistleblower is subjected to detrimental treatment as a result of making a report under this policy, the whistleblower should inform a Protected Disclosure Officer or a senior manager immediately, or raise it in accordance with Section 4 of this policy.</p> <p>7.4. Protection of files and records</p> <p>a. All files and records created from an investigation will be retained securely.</p> <p>b. Unauthorised release of information to someone not involved in the investigation (other than the senior managers or directors who need to know to take appropriate action, or for corporate governance reasons) without consent as a whistleblower will be a breach of this policy.</p> <p>c. Whistleblowers are assured that unauthorised release of information in breach of this policy will be regarded seriously and will be dealt with under BPP Institute's disciplinary procedures.</p> <p>d. The Corporations Act also gives special protection to disclosures about breaches of the Act, provided certain conditions are met. Refer to Appendix A for further details.</p> <p>e. The Taxation Administration Act 1953 (Cth) also gives special protection to disclosures about breaches of any Australian tax</p>
--	--

	<p>law, provided certain conditions are met. Refer to Appendix B for further details.</p> <p>8. Duties of employees in relation to reportable conduct</p> <p>8.1. BPP Institute expects that all employees and contractors who become aware of actual, suspected or potential cases of Reportable Conduct will make a report under this policy or under other applicable company policies.</p> <p>9. Reporting</p> <p>9.1. The CEO report annually to the Board of Directors on the number and type of whistleblower incident reports received.</p> <p>9.2. The CEO will report any disclosure of a serious nature to the Board of Directors.</p> <p>9.3. These reports will be made on a “no names” basis, maintaining the confidentiality of matters raised under this policy.</p> <p>Any information that might lead to the disclosure of the identity of the whistleblower will also be excluded from these reports.</p>
Related Documents	<p>Anti-corruption, Bribery and Fraud Prevention Policy Staff Code of Conduct Policy Staff Grievance Policy</p>
<i>For Administrative Use Only</i>	
Responsible Officer	Chief Executive Officer
Contact Officer/s	Chief Executive Officer
Approved by	Board of Directors
Definitions	See BPP Institute`s Glossary of Terms and Acronyms

<i>Version History</i>		
Version No.	Approval Date	Amendment/s
1.	May 2025	First iteration <ul style="list-style-type: none"> • For BPP Institute