WHISTLEBLOWER POLICY
Submission Process

Eligibility

Are you an eligible Whistleblower? (see point 1 of Policy)

Do you have, on reasonable grounds, Reportable Conduct to report? (see point 2 of Policy)

Are you an eligible Whistleblower?

Yes

Yes

No?

Do you have, on reasonable grounds, Reportable Conduct to report?

Yes

No?

Report the conduct to an Eligible Recipient (see point 5 of Policy)

I want to remain Anonymous – can I? (see point 3 of Policy)

Yes.

Who do I Report to?

An MP or a Journalist (If Relevant Authority has not acted on report within 90 days, then a Public Interest or Emergency Disclosure may be made see point 6 of Policy)

A Relevant Authority (e.g. ASIC / APRA)

A BDI ‘Officer’ e.g. Whistleblower Protection Officer (WPO) - r.sharps@blackdog.com.au, m.spencer@blackdog.com.au. A member of the Executive, Operational Leadership Team or the Board of Directors.

BDI Auditor (EY)

Investigation & Findings

How and if the Reportable Conduct is Investigated will be determined by the WPO (see point 10 of Policy)

If an investigation is warranted, a report of findings will be prepared (see point 11 of Policy)

The Findings report will include:
- The allegations
- All relevant findings
- Conclusions reached
- Recommendations to address any wrongdoing or other matters arising.

Whistleblowers, in relation to Reportable Conduct, will not be subject to disciplinary action or detriment. This does not include being granted immunity for any misconduct a Whistleblower has engaged in. (see point 4 in Policy)