

Whistleblower Procedure

Purpose

This Procedure supports the South Australian Cricket Association Limited's (**SACA**) Whistleblower Policy by setting out how you can make a disclosure or report of Improper Conduct and what will occur once a report is made. It explains the process for submitting a concern, how SACA will receive a disclosure or report and the steps involved in assessing, investigating, and managing the matter.

The identity of an eligible whistleblower and the contents of any disclosure or report will remain confidential, in accordance with applicable legislation.

SACA is committed to handling disclosures or reports promptly, fairly and confidentially, in accordance with legal and ethical standards. This procedure is designed to provide clarity and reassurance so that you can speak up without fear of detriment or reprisal, knowing that concerns will be addressed appropriately and with integrity.

Improper Conduct

This procedure applies to disclosures or reports of actual or reasonably suspected misconduct or an improper state of affairs (**Improper Conduct**) relating to, involving or within SACA, or other protected whistleblower disclosures under the *Corporations Act 2001 (Cth)*, made to an eligible report recipient.

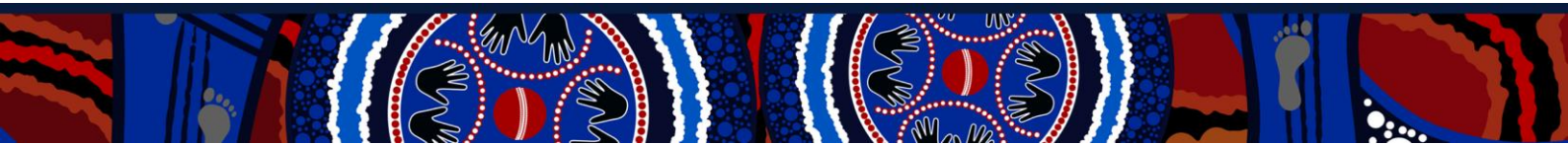
The SACA Whistleblower Policy sets out examples of Improper Conduct by way of guidance.

How can I speak up?

You can make a whistleblower disclosure or report in a way that feels safe and appropriate for you. This may include making a disclosure or report of Improper Conduct:

- to a SACA leader, SACA Chief Executive Officer (**CEO**), a member of the SACA Executive Leadership Team (**ELT**) or a SACA director or officer;
- to SACA's external auditors (as notified in SACA's annual financial reports from time to time);
- by contacting the Cricket Integrity Hotline on 1300 FAIR GAME (1300 3247 4263) (an externally monitored hotline); or
- to any other person(s) authorised by SACA to receive disclosures or reports under this policy (as notified by SACA from time to time).

A disclosure or report may be made verbally or in writing.



It is important to understand that not all reports or disclosures will be ‘protected disclosures’ qualifying for whistleblower protections under the *Corporations Act 2001* (Cth). If unsure, we recommend seeking independent legal advice.

Making a disclosure or report

When making a disclosure or report, you should have knowledge of, or objectively reasonable grounds to suspect, Improper Conduct in relation to SACA. Your disclosure may still qualify for whistleblower protections even if it turns out to be inaccurate.

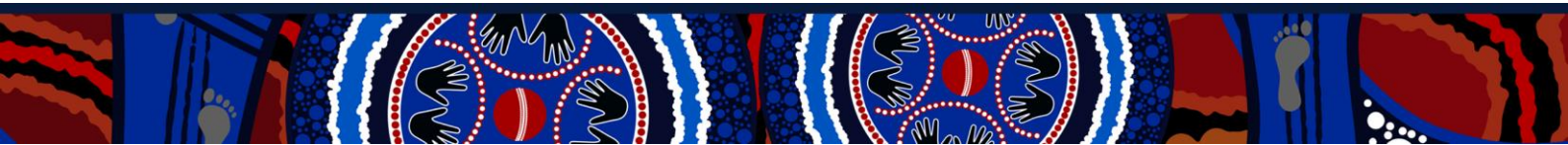
When making a disclosure or report under the SACA Whistleblower Policy and this procedure, you should:

- state that you are making a whistleblower disclosure or report;
- identify your status as an eligible whistleblower (e.g. are you a current or former SACA employee or other SACA personnel or a SACA contractor etc within the scope of the SACA Whistleblower Policy);
- clearly describe the Improper Conduct you are concerned about and provide as much detail as possible to enable proper assessment and any appropriate investigation, including:
 - date, time and location;
 - name(s) of person(s) involved, titles/roles and their department/team;
 - your relationship with the person(s) involved;
 - the general nature of your concern;
 - how and when you became aware of the issue;
 - possible witnesses; and
 - any other information you have to support your disclosure or report.

It is important that you carefully note and keep records of all of the relevant details available at the time (for example, what happened, when and where it occurred, who was involved and identify anyone who may have witnessed the behaviour being reported).

When your disclosure or report is received by SACA (however reported), the information provided will be held securely, with access limited to only those individuals who need it to assess and conduct any investigation of the disclosure / report (whether internal or external) and to support and protect you.

In some circumstances, SACA may need to disclose information to appropriate regulatory authorities, law enforcement bodies or other persons it considers necessary for the purposes of conducting an investigation.



Confidentiality and identity protection

You may choose to make a confidential disclosure or report and remain anonymous or partially anonymous (for example, by using a pseudonym so your identity is not known to others), and we will respect that choice.

There is no requirement to identify yourself at any stage during the reporting or investigation process. You may also refuse to answer questions that you feel may reveal your identity.

Anonymous or partially anonymous disclosures will be accepted, however anonymity may, in some circumstances, limit aspects of the investigation process or the provision of support. Sufficient information must still be provided to allow the matter to be properly investigated.

Anonymous reports may also be made via the Cricket Integrity Hotline.

Should you choose to remain anonymous, you can still obtain updates, or report concerns about detrimental conduct or reprisal through the channels listed above for making disclosures or reports.

Initial review and assessment

Reports or disclosures will initially be directed to the SACA Chief Business Officer (unless involved, in which case an alternative and appropriate member of the ELT will be substituted).

Once you make a disclosure or report and it is received by SACA:

- it will be acknowledged promptly, and, if your identity is disclosed (rather than remaining anonymous), we will check on your wellbeing and put in place any appropriate measures to support you;
- an initial review and assessment will be undertaken to determine if your disclosure or report is within the scope of, and qualifies for protection under, the SACA Whistleblower Policy;
- we will assess if an investigation is feasible, warranted and appropriate (including assessing whether there is sufficient information to undertake an investigation);
- if an investigation is to be pursued, we will determine the appropriate investigation process (including its nature, scope, conduct and timeframes and any advice required) and appoint either an internal or external investigator (or investigators), as appropriate for the circumstances;
- we will take all reasonable steps to maintain your confidentiality as the whistleblower and regarding the subject(s) of the report or disclosure; and
- we will keep you informed, where possible and if your identity is disclosed.

If/where an investigation is to be conducted, the investigative steps required may vary depending on the nature of the disclosure or report.



Investigation and management

Investigations will generally involve evidence gathering, analysis, documentation and reporting. It may be necessary and appropriate to interview witnesses or individuals involved in the report or disclosure of alleged Improper Conduct. Where this occurs, the investigator(s) will not share your identity without your consent, and all reasonable steps will be taken to protect the confidentiality of your identity and reduce the risk that information enabling identification is disclosed.

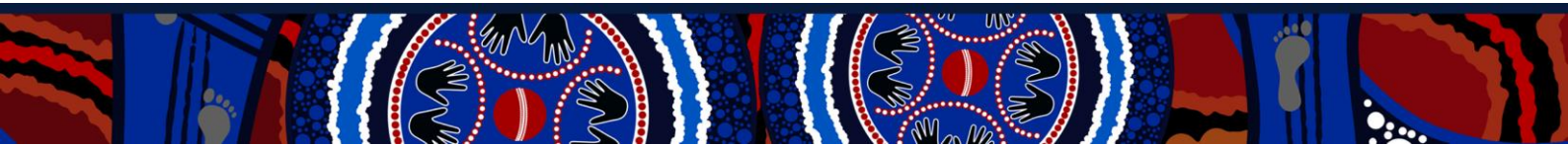
The appointed investigator(s), whether internal or external, will conduct a fair and objective investigation, without bias, as quickly and efficiently as feasible, while affording procedural fairness and natural justice. Investigator(s) may consult with legal advisers (internal or external) and/or certain members of the ELT or CEO, where appropriate, on a confidential 'need to know' basis.

The appointed investigator(s) will:

- review the information you have provided and gather any additional information;
- inform any person(s) who are the subject of the disclosure/report of the allegations made against them (within any confidentiality constraints) and provide them with an opportunity to respond;
- keep records of all information gathered and steps or actions taken and store those records securely;
- take all reasonable steps to protect your identity as the whistleblower (for example, by using gender neutral language and redacting or avoiding disclosure of identifying details);
- provide you with status updates at regular or agreed intervals, subject to privacy, confidentiality or other legal obligations (if your identity is disclosed); and
- prepare a report on investigation outcomes as soon as reasonably practicable, including:
 - findings of fact;
 - a determination as to whether the disclosure / report has been substantiated; and
 - recommendation(s) for appropriate actions or response(s),

which will be stored securely, to preserve confidentiality.

During and pending any investigation, we will take steps to avoid or prevent harm to you as the whistleblower. This may include measures such as a change of location, suspension of alleged perpetrator or reallocation of duties.



Outcomes

Any investigation report will be provided to the SACA Chief Business Officer (or their alternate) who may inform the CEO, Board and relevant members of the ELT, subject to confidentiality constraints. The Chief Business Officer (or alternate) may also seek legal advice from SACA Legal Counsel and/or external advisers.

If issues are identified and established, SACA will take appropriate action. Outcomes may range from informal measures, such as requiring an explanation, informal resolution, documentation, monitoring, or remedial steps, to formal disciplinary action for breaches of the Code of Conduct or other internal policies (including under the SACA Employee Misconduct Procedure, if/where applicable), up to and including suspension or termination of employment or other relevant engagement or contractual arrangement. Where a suspected or actual breach of law is found, the matter may be referred to the appropriate legal authority or regulator.

You will receive a final status update as to the outcome(s) of your disclosure or report (if your identity has been disclosed and you have provided your contact details). Depending on circumstances and legal obligations, the level of detail provided regarding the investigation and its outcomes may be limited.

Support

SACA will seek to maintain contact with you and provide access to support once you make a disclosure or report (if your identity is disclosed and your contact details are supplied), including, for example:

- access to our Employee Assistance Program (EAP) (if/where you are a SACA employee);
- referral to other support options or resources to assist in maintaining wellbeing;
- a dedicated support person to assist throughout the process;
- status and progress updates, where feasible and appropriate; and/or
- assistance in addressing any detrimental conduct you report.

This support can also extend to individuals involved in, or the subject of, an investigation.

If you are not current SACA personnel, we may still be able to offer certain support, although this may differ from what is provided to current SACA personnel for practical reasons.

