

WHISTLEBLOWER POLICY

This Policy sets out how CIMIC Group Limited and entities it controls (the **Group**) manage whistleblower disclosures. It forms part of the Group's whistleblowing management system and is to be read in conjunction with the *CIMIC Complaints and Investigation Procedure (Procedure)*.

The Policy is available to all officers and employees via the CIMIC intranet and Group Governance System.

The **objectives** of this Policy are to provide clarity on how we support Whistleblowers so they:

- Know how to raise concerns and are aware of their rights and obligations, including the right to remain anonymous; and
- Feel safe in speaking up and raising concerns, free from detriment, retaliation or victimization.

The Group is committed to complying with applicable laws for protection of Whistleblowers.

1. Who is a Whistleblower?

For the purpose of this Policy, a **Whistleblower** is a current or former:

- Director, Manager or Employee; or
- Contractor, consultant, supplier, service provider or associate (or their employees or subcontractors); or
- Any relative, dependent or spouse of any individual referred to above,

who makes or attempts to make a disclosure, on reasonable grounds, about:

- conduct that is contrary to the *CIMIC Code of Conduct* or the *CIMIC Workplace Behaviour Policy*;
- an improper state of affairs; or
- a breach of the legislation set out in the *Corporations Act 2001 (Cth) (Act)*.

Personal work-related grievances may not be protected pursuant to this Policy.

2. Making a Disclosure

The Policy applies where the **Whistleblower** makes the disclosure to an **Eligible Recipient**.

An Eligible Recipient includes:

- A person authorised by the Group to receive disclosures;
- An officer, senior manager, auditor or actuary of the Group; and
- The CIMIC confidential third-party whistleblowing service (**Ethics Line**).

A disclosure may also be protected under the Act if:

- made to certain regulators or legal practitioners in the circumstances stated in the Act; or
- if it is a 'public interest disclosure' or 'emergency disclosure' made to journalists or parliamentarians, in certain circumstances where previous disclosure has been made to prescribed government bodies and as stated in the Act. Whistleblowers should contact an independent legal adviser before making a 'public interest disclosure' or an 'emergency disclosure'.

3. Confidentiality, Anonymity and Personal Information

The identity of the Whistleblower (or information disclosed that could lead to their identification), will be treated strictly confidentially and will not be shared unless:

- The Whistleblower has provided prior consent (in writing wherever possible or required); or

- We are compelled by law or certain government authorities to do so; or
- We consider it appropriate to make a disclosure to a regulator under legislation.

We will comply with all requests for anonymity (subject to legal requirements) and make best endeavours to investigate the disclosure. Factual circumstances or personal characteristics can sometimes reveal the identity of a whistleblower despite best efforts of those investigating a report to keep the identity of the whistleblower confidential. There may also be practical limitations on what can be investigated if a Whistleblower does not agree to share their disclosure or identity.

A whistleblower who wishes to remain anonymous may wish to adopt a pseudonym for the purpose of the disclosure. They can also refuse to answer questions they feel could reveal their identity at any time, including during the course of an investigation or a follow-up conversation.

CIMIC will collect, use, store, transfer and process a whistleblower's personal data in accordance with the [CIMIC Privacy Policy](#) and any other relevant policies and procedures relating to data protection in place from time to time.

4. Investigation

Whistleblower disclosures will be referred to the Business Conduct Representative in CIMIC or the respective Operating Company to perform a preliminary review of the allegations raised and commission an appropriate investigation.

All investigations will be conducted in accordance with the procedures set out in the *Procedure* ensuring that the discloser will be kept informed, their details will be kept confidential and investigations will be documented, and the outcome communicated to the discloser.

5. Workplace Protection Officer (WPO)

The Business Conduct Representative must inform the Workplace Protection Officer (WPO) of the matter. The WPO is responsible for safe guarding the interests of the Whistleblower by:

- Protecting the Whistleblower from retaliation;
- Maintaining the confidentiality of the Whistleblower; and
- Reviewing and considering any complaints of retaliation or any concerns that the disclosure has not been dealt with in accordance with this Policy.

6. How are Whistleblowers protected?

Whistleblowers have statutory protections under the Act in addition to the protections provided by the Group under this Policy. Protections under the Act may include identity protection, protection from detrimental acts or omissions, compensation and remedies and liability protections.

The Group will ensure fair treatment of Whistleblowers and does not condone any form of reprisal (disciplinary or retaliatory) being taken against anyone for raising or helping to address a concern. The Group will take all reasonable steps to protect Whistleblowers from such retaliation.

Whistleblowers will not be personally disadvantaged as a result of reporting. Examples of disadvantage include dismissal, demotion, harassment, discrimination, interference with their role or bias.

Whistleblowers who feel they have been disadvantaged as result of reporting should approach the WPO.

Any person who participates in any reprisal against a Whistleblower will be subject to disciplinary action, which may result in termination of employment or reference to an external authority.

The Group retains the right to manage personal work-related grievances with a Whistleblower. These are matters that arise in the ordinary course of their employment or engagement (i.e. a separate or unrelated performance or misconduct issue).

7. False reporting

While whistleblowers who raise concerns in accordance with this Policy will have the benefit of the protections in this Policy, deliberate false reporting will not be tolerated and any person found to have made a deliberate false report will be subject to disciplinary action.

8. Workplace Protection Officer Contact Details

Whistleblowers who feel they have been disadvantaged as a result of reporting should approach the WPO or delegate within an Operating Company:

Operating Company	Name	Role	Email
WPO CIMIC	Andrew Nolan	Chief People and Administration Officer	Andrew.Nolan@cimic.com.au

Key contacts can also be found on the CIMIC Group Intranet home page, under 'Group Code of Conduct'.

9. ETHICS LINE

The Ethics Line is administered by an external provider to provide an independent, free and safe avenue for reporting 24 hours, 7 days per week.

Operating Company	Telephone*	Free call	Email Address
CIMIC Group Limited, Leighton Properties, Devine, Pacific Partnerships and EIC Activities	+61 3 9811 3260	1300 815 612**	cimicgroup@stopline.com.au
Thiess	+61 3 9811 3261	1300 844 377**	thiess@stopline.com.au
CPB Contractors	+61 3 9811 3262	1300 817 574**	contractors@stopline.com.au
Leighton Asia, India and Offshore (LAIO)	+61 3 9811 3263	N/A	laio@stopline.com.au
Sedgman	+61 3 9811 3265	1300 627 951**	Sedgman@STOPline.com.au
UGL	+61 3 9811 3266	1300 413 999	ugl@STOPline.com.au

* A reverse call charge can be made by calling through the local country telephone operator. If located outside of Australia, employees should use this number and reverse the charges.

** Australia only. Some overseas Operating Companies have local free-call numbers.

All Group employees can also contact the Ethics Line via Online Disclosure Form, Post or App – STOP247. For details please visit <http://cimic.stoplinereport.com/>.

10. Monitoring and Reporting

CIMIC's objective is to implement and maintain an effective whistleblowing management system based on the principles of trust, impartiality and protection that provides for the receiving, assessing and addressing of reports of wrongdoing, as well as the concluding of whistleblower cases. CIMIC is committed to the monitoring and continual improvement of its whistleblowing management system.

The Operating Company Reportable Conduct Groups must prepare reports for the CIMIC Reportable Conduct Group on a quarterly basis and the CIMIC Reportable Conduct Group prepares a consolidated report for the CIMIC Ethics, Compliance and Sustainability Committee on a quarterly basis.

Policy Information

Owner:	Group General Counsel, CIMIC
Approved by:	Executive Chairman and Chief Executive Officer, CIMIC
Effective date:	GGs published 20 December 2019 as amended 26 October 2023

Note: CIMIC Group policies and procedures may be amended from time to time.