

Speak Up Policy

1. INTRODUCTION

Bingo Industries Limited (and its subsidiaries) (“**Bingo**”) is committed to a culture of corporate compliance and high standards of ethical behaviour. Bingo’s ethical values and expected standards of conduct are set out in our Code of Conduct, the Discrimination, Harassment and Bullying Policy and the Grievance Policy and can be used to guide the way we behave with others, whether that be our colleagues, our customers or our suppliers.

The Speak Up Policy (“**Policy**”) complements the above codes and policies and deals with the reporting of any actual or suspected wrongdoing or any other issues that may be affecting your work or that may affect Bingo, its employees, customers or suppliers. Bingo recognises the importance of ensuring a safe, supportive and confidential environment where people feel confident to ‘speak up’ about wrongdoing and feel supported throughout the process. This Policy establishes the minimum requirements for how Bingo will foster and encourage a safe and confidential culture of speaking up whilst ensuring there are protections and protocols in place to support those who elect to seek protection as a result of speaking up under this policy.

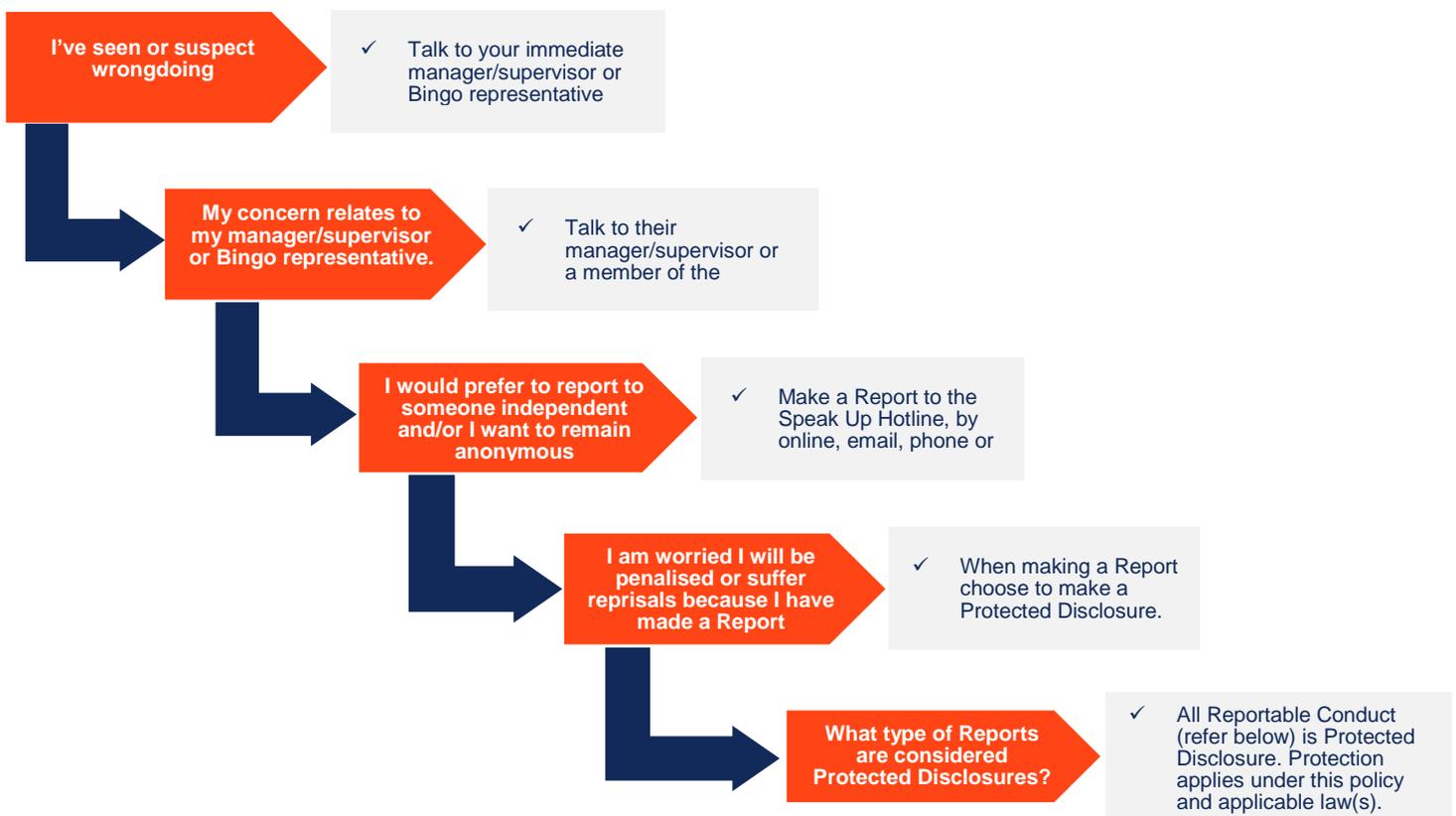
2. APPLICATION

This Policy applies to all current and former (including family members and dependents of):

2.1 directors, officers, employees, agents, contractors and subcontractors of Bingo, whether full-time, part-time or casual, at any level of seniority wherever employed (collectively referred to as “**Employee**” for the purpose of this Policy); and

2.2 suppliers and their employees (“**Supplier**”) that provide goods or services to Bingo.

3. RAISING A CONCERN



Employees who suspect any wrongdoing or any other issue that may be threatening their safety or wellbeing at work, or that may be negatively impacting Bingo, its employees, customers or suppliers are encouraged to raise the issue as soon as possible.

Where practicable, you are encouraged to approach your immediate manager/supervisor in the first instance (Employee) or Bingo representative (Suppliers) as this provides a logical option to discuss your concerns and for Bingo to take management action where appropriate.

Alternatively, if the concern involves your immediate manager/supervisor (or primary point of contact), you are encouraged to raise your concerns to either the manager/supervisor one level above or the People and Culture team.

If you choose to raise a concern, but feel that it is not appropriate to raise the issue to:

- your immediate manager/supervisor (or primary point of contact);
- the manager/supervisor one level above or the People and Culture team; or
- you have concerns for your wellbeing or fears of reprisal as a result of raising a concern,

you may make a Report through to an Eligible Recipient, including Bingo's 'Speak Up' Hotline. If the nature of your concern relates solely to a grievance or performance issue, you are encouraged to follow Bingo's formal complaint management/grievance procedure, provided in Bingo's Grievance Policy, a copy of which can be found at: <https://www.bingoindustries.com.au/sustainability/governance>

What is a 'Report'?

A **Report** is a disclosure made by any Employee or Supplier, whether protected or not, through one of the Speak Up Reporting Channels set out in this Policy. A Report can be general in nature or can be a protected disclosure (refer below).

What is 'Reportable Conduct'?

Reportable Conduct is any conduct (e.g. issue or wrongdoing) which could be considered to be:

- 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 bribery;
- Financial irregularities;
- Failure to comply with, or breach of, legal or regulatory requirements;
- A breach of an internal policy;
- An activity that endangers health, safety or the environment;
- 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 be planning to make, a disclosure; and/or
- An offence against, or a contravention of, a provision of certain legislation contained in Appendix A.

How do I 'Speak Up'?

Bingo has a number of Eligible Recipients to whom a person speaking up (Whistleblower) may make a Report to. These Eligible Recipients include:

- Bingo's external Speak Up Hotline provider, Core Integrity Pty Ltd;
- The Chief People and Culture Officer;
- The Whistleblower Investigations Officer (WIO);
- The Whistleblower Protection Officer (WPO);
- A member of the Executive Committee; or
- A Board Member of Bingo.

Bingo's Speak Up Hotline is an externally managed and independent hotline service provided by our integrity partners, Core Integrity Pty Ltd ("Core Integrity").

Core Integrity are experienced in the management of Speak Up reports and treat all matters in the strictest of confidence and adhere to the procedures outlined in this Policy.

Of the list of Eligible Recipients, we encourage you to utilise the Speak Up Hotline to ensure your Report is received and actioned in a timely manner and to ensure you receive a consistent experience.

The channels through which you can make a Report to Bingo's Speak Up Hotline include:

Speak Up Hotline Channel	Details
Web & Online (URL)	https://qrs.ly/BingoSpeakUp
Web & Online (QR Code)	
Email	speakup@coreintegrity.com.au
Phone	1800 324 775
Mail	Speak Up P.O. Box 895 Darlinghurst NSW 1300

What happens when I make a Report?

When making a Report under this Policy, you will be requested to provide as much information as possible about the issue being raised. Information such as dates, times, location, individuals involved, other witnesses, physical evidence (e.g. documents, images) and any other general information may be sought.

This information is important as it enables Bingo to properly assess the concerns being raised and decide on the appropriate course of action to be taken.

Any information provided in a Report (including the Reporter's details) may be used by Bingo in consideration of an investigation or some other action except in certain circumstances such as a whistleblower report (Protected Disclosure) where the person speaking up (i.e. a Whistleblower) has not specifically consented to the information (including the Reporter's details) being used.

How is my Report protected?

If you make any Report under this Policy you will have your details, and the information you provide, treated in the strictest of confidence. If you are seeking to have your Report protected under this Policy (i.e. as a 'Whistleblower') you must have reasonable grounds to believe the Report and information supplied is true and have made your Report to an Eligible Recipient.

Bingo is committed to ensuring that a person who makes a Report is provided support and protection from personal or financial disadvantage as a result of making a Report in good faith. Bingo will not tolerate any form of retaliation against Employees or Suppliers who make a Report in good faith under this Policy.

If you have chosen to make a protected disclosure Report, or are entitled to Whistleblower protection, and believe you have been subjected to any form of reprisal or adverse action as a result of making a Report, you should notify Bingo's Whistleblower Protection Officer (**WPO**) (refer below).

Can I remain anonymous?

You can choose to remain anonymous when making a Report.

When making a Report, your identity and the information you provide in your Report will not be disclosed unless you consent to the disclosure of that information or if Bingo has been compelled or permitted by law, regulatory obligations or broader external requirements to disclose the information.

It is important to remember that anonymous Reports can, at times, be more difficult to investigate and if you choose to remain completely anonymous and do not provide any contact information, the WPO and/or Whistleblower Investigations Officer (**WIO**) may be unable to make contact with you to ask further questions about your Report or provide you with any updates on the investigation or provide you with feedback on the Report.

Should you wish to remain anonymous, you are encouraged to submit your Report via Core Integrity's online and secure reporting channel (web link and/or QR code) referred to in [How do I 'Speak Up'?](#) above.

If you submit a Report via our secure online reporting channel, and elect to remain anonymous, you can still receive updates on your Report, communicate with those who may be reviewing or investigating your issue, provide more information and check on the status of your Report by submitting a Report via the online reporting platform.

To ensure you are notified of any changes to your Report, including new comments from those reviewing or investigating your issue, you are encouraged to provide your email address within the secure platform. Your email address will not be visible or accessible to anyone from Bingo or the independent third party, Core Integrity, and it will be deleted from the secure reporting channel at the completion of dealing with your issue.

If you wish to remain anonymous, you should remove all identifying metadata from any supporting documentation that you upload to the platform, this could include names of files, author details and other information.

4. INVESTIGATION

Stage One

Once a Report has been received and assessed, Bingo will determine the appropriate action required. Examples of actions could include:

- the Report is forwarded for an investigation to take place;
- the Report is recorded for information purposes; or
- no further action is taken.

If a Report you submitted is recommended for information purposes or for no further action, where practicable you will be contacted and advised of the determination.

Stage Two

If a Report you submitted is recommended for an investigation to take place, an assessment will be made by the WIO (who may be the General Counsel or Chief People and Culture Officer in certain circumstances), or in the event of a Protected Disclosure, the WPO.

The Report will be assigned to an appropriate investigator either internally or externally for further action. All investigations will be conducted in a manner that is fair, confidential, objective (without bias) and timely.

Stage Three

At the conclusion of an investigation, you may be informed of the outcome of the investigation by Bingo.

Relevant Authorities

Bingo may in certain circumstances, whether required by law or if it deems it appropriate, inform the relevant authority of any contents of a Report made.

5. ROLES AND RESPONSIBILITIES

Whistleblower Protection Officer (WPO)

The WPO is a senior employee appointed by Bingo to, as far as is reasonably practicable, protect persons who seek, or are entitled to, protection when making a Report and is accountable for the provisions of this Policy. The WPO role is performed by Bingo's Internal Audit and Risk Manager. In respect of Protected Disclosures, the WPO will:

- Receive a Protected Disclosure from the Speak Up Hotline, an Employee or Supplier;
- Provide assistance and support to a person speaking up who is seeking protection before, during or after they make a Report (disclosure) in respect of this Policy or are entitled to protection in terms of law;
- Enable the investigation of Reportable Conduct; and
- Maintain the confidentiality, privacy and anonymity (as required) of the person speaking up.

Details of Bingo's WPO are:

Position: Internal Audit and Risk Manager
Email: speakupWPO@bingoindustries.com.au

Whistleblower Investigation Officer (WIO)

The WIO is responsible for leading, coordinating or overseeing the investigation of Protected Disclosers made under this Policy.

The WIO can elect to appoint another party, either from within Bingo or external to it, to undertake an investigation on their behalf under this Policy and is to ensure that the investigation is conducted in a fair, confidential, objective (without bias) and timely manner.

Whistleblower (Protected Disclosure) Reports will be assessed by the WIO who will review the Report and decide on the appropriate next steps.

The WIO may be assisted, as required, in determining what the appropriate next steps should be.

Details of Bingo's WIO are:

Position: General Counsel
Email: speakup@bingoindustries.com.au

Employee Assistance Program (EAP)

When you make a Report under this Policy, the WPO is responsible for overseeing your protection. If you experience any issues as a result making a Report, you should in the first instance contact the WPO.

If you are an Employee seeking general welfare support or counselling, you should contact Bingo's Employee Assistance Program (EAP).

This is a free and confidential service provided by an independent and external provider, **Drake Workwise**:

Contact no: 1300 135 600
Website: www.drakeworkwise.com.au

6. COMMUNICATIONS WITH THE REPORTER

Where practicable, Bingo will endeavor to keep you informed of the outcomes, if any, of Reports made, subject to the considerations of privacy of those against whom allegations are made and any other factors that may limit the amount of information that can be provided to you.

Formal updates and communications will be entered into Core Integrity's secure, online reporting platform where you are able to receive updates and communicate with Bingo on your Report, should you choose. If you are choosing to make an anonymous Report, and you wish to utilise the online and secure platform, you are encouraged to supply your email address in order to receive notifications of updates and changes on your Report. This email address will not be visible or accessible by Bingo or Core Integrity.

7. FURTHER INFORMATION AND ADVICE

For further information, refer to other related Bingo policies or contact the Chief People and Culture Officer.

8. GLOSSARY OF TERMS

Term	Definition
Eligible Recipient	Eligible Recipients include: <ul style="list-style-type: none"> • Bingo's external Speak Up Hotline provider, Core Integrity Pty Ltd; • The Chief People and Culture Officer; • The Whistleblower Investigations Officer (WIO); • The Whistleblower Protection Officer (WPO); • A member of the Executive Committee; or • A Board Member of Bingo.
Report	A report is a disclosure made by a Whistleblower to an Eligible Recipient.
Reportable Conduct (wrongdoing)	Reportable Conduct is any conduct (e.g. issue or wrongdoing) which could be considered to be: <ul style="list-style-type: none"> • 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 bribery; • Financial irregularities; • Failure to comply with, or breach of, legal or regulatory requirements; • A breach of an internal policy; • An activity that endangers health, safety or the environment; • 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 be planning to make, a disclosure; • Prescribed as Reportable Conduct by regulations made for the purposes of Section 1317AA(5) of the Corporations Act 2001; and/or • An offence against, or a contravention of, a provision of the following legislation: <ul style="list-style-type: none"> ○ the Corporations Act 2001; ○ the ASIC Act 2001; ○ the Banking Act 1959; ○ the Financial Sector (Collection of Data) Act 2001; ○ the Insurance Act 1973; ○ the Life Insurance Act 1995; ○ the National Consumer Credit Protection Act 2009; ○ the Superannuation Industry (Supervision) Act 1993; and/or ○ an instrument made under the abovementioned legislation.
Whistleblower	Any current or former (or family member or dependent of) a: <ol style="list-style-type: none"> 1. Employee; 2. Supplier, who: <ul style="list-style-type: none"> • Makes a Report relating to any Reportable Conduct; • Makes the Report to an Eligible Recipient; and • Has reasonable grounds to suspect that the Reportable Conduct has taken place.
Whistleblower Investigations Officer (WIO)	A senior member of Bingo who is responsible for assessing, leading, coordinating or overseeing the investigation of protected Whistleblower disclosures in a fair, confidential, objective (without bias) and timely manner. For the purposes of this Policy, the WIO is the General Counsel.
Whistleblower Protection Officer (WPO)	A senior member of Bingo who is responsible, as far as is reasonably practicable, to protect Whistleblowers and is accountable for the provisions of this Policy. For the purposes of this Policy, the WPO is the Internal Audit and Risk Manager.

9. RELATED DOCUMENTS

- Code of Conduct
- Discrimination, Harassment and Bullying Policy
- Grievance Policy