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SPEAKING UP! POLICY

PURPOSE

MaxiTRANS is committed to ethical standards of behaviour, so the Speaking Up! Policy has been adopted to:

- Promote an honest, transparent and ethical culture at MaxiTRANS.
- Encourage the prompt reporting of unlawful, unethical or corrupt behaviour at MaxiTRANS.
- Explain how you can “Speak Up” about such conduct and what protections are available to those who do.
- Explain how MaxiTRANS will respond to any report made under this policy.

If you have seen or suspect something at MaxiTRANS which doesn't “seem right”, we want to hear from you!

SCOPE

This Policy applies to all those involved in the conduct of MaxiTRANS’ business and to all of its brands and operations in every location.

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PART A - AUSTRALIA

IF YOU ARE BASED IN NEW ZEALAND GO TO PART B

A: What to “Speak Up” about?

MaxiTRANS wants everyone to feel safe, supported and encouraged to “Speak Up” about Potential Wrongdoing. In this context, Potential Wrongdoing means:

1. Any misconduct or an improper state of affairs or circumstances in relation to MaxiTRANS;
2. Information that MaxiTRANS or any officer or employee of MaxiTRANS or a related body corporate has engaged in conduct that:
 - a. contravenes or constitutes an offence against certain legislation (e.g. the Corporations Act);
 - b. represents a danger to the public or the financial system; or
 - c. constitutes an offence against any law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more.

Examples of Potential Wrongdoing include:

- Breach of laws or regulations
- Fraud or mismanagement of MaxiTRANS’ finances
- Bribery or corruption
- Anti-competitive behaviour
- Any breach of the ASX Listing Rules
- Unauthorised access to or use of MaxiTRANS’ confidential information
- Concealing any of the above or other Potential Wrongdoing

Any personal employment-related grievance is **not** covered by this Policy.¹ Employment-related grievances should be notified and will be addressed via the dispute resolution procedures of any applicable industrial instrument (for example, any enterprise agreement applicable to any group of employees in Australia) and/or the MaxiTRANS Conflict Resolution Procedure.

B: Who should Speak Up?

MaxiTRANS encourages any person who is aware of Potential Wrongdoing in connection with MaxiTRANS to “Speak Up” by making a report under this Policy (**Report**). This includes anyone who is, or has been, an

¹ An employment-related concern should be reported under this policy if it (a) concerns any detriment or reprisal, or a threat made, to a MaxiTRANS employee who made, or was considering making, or was suspected to have made or been considering making, a Report under this policy, or (b) in Australia, concerns either (i) a work related concern that extends beyond the Discloser personally and which has significant implications for MaxiTRANS or (ii) a disclosure to a legal practitioner for the purposes of obtaining legal advice or representation in relation to the operation of the law about whistleblowers.

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employee, director, officer, contractor, supplier, associate or consultant of MaxiTRANS, or a relative or spouse of any of these (called in this Policy **Disclosers**).

C: Who can you Speak Up to?

You are encouraged to “Speak Up” to FairCall, an independent service run by KPMG which is available in multiple languages and can be contacted as follows:

- **By phone (toll free): Dial 1800 500 965 within Australia**
- **By email: faircall@kpmg.com.au**

A Report can also be made to:

- MaxiTRANS’ General Counsel; or
- Any of the people or regulators described in Attachment A.

If you want to remain anonymous, you are encouraged to report to FairCall.

D: What to do when Speaking Up

When making a Report:

- A Discloser should provide as much information as possible, including details of the Potential Wrongdoing, people involved, dates, locations and any other evidence of which you are aware. Physical evidence, if any, can be provided too (e.g. emails).
- FairCall (or other person receiving your Report) will seek the Discloser’s consent (i) before requesting any personal details (such as a name) and (ii) consent to disclose personal information for purposes associated with discharging this Policy (including any investigation into a Report) or satisfying MaxiTRANS’ obligations at law in connection with a Report.

A REPORT UNDER THIS POLICY CAN BE MADE ANONYMOUSLY so you do not have to agree to provide your name (and an anonymous Discloser is still entitled to protections available under law if a Protected Disclosure is made).

A Discloser must have reasonable grounds to suspect that the information being disclosed is true or likely to be true, but you will not be penalised if it turns out to be incorrect or cannot be substantiated.

A person must not make a false or malicious Report – knowingly making a false or malicious Report is a breach of the MaxiTRANS Code of Conduct and for a MaxiTRANS employee or officer may result in disciplinary action (up to and including termination of employment).

E: How MaxiTRANS will respond

All Reports will be received and treated sensitively and seriously, and will be dealt with, and if necessary, investigated, promptly, fairly and objectively.

Following a Report, either internally or externally, the following will occur:

- i. The completed Fair Call report and/or other information provided as the Report will be sent to the MaxiTRANS General Counsel (**GC**).

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- ii. The GC will review the information received and commence an investigation in accordance with the Procedure.

If the GC is the subject of any Report, MaxiTRANS' Managing Director will assume the GC's responsibilities under this section and Schedule 2 (and for the purposes of that Report, under the Policy generally).

All people (including a Discloser, even if anonymity has been requested) must keep the Report and any investigative process confidential at all times and not discuss the matter with any unauthorised persons. Information provided by a Discloser when making a Report and provided by any person in the course of an investigation may be disclosed by MaxiTRANS in certain circumstances as outlined in the Procedure.

F: Protection for those who "Speak Up"

Confidentiality

Where the Discloser has not elected anonymity, information about a Discloser's identity or information that is likely to lead to the identification of the Discloser will be kept confidential at all times, except to the extent that the Discloser has consented otherwise or any of the exceptions outlined in the Procedure apply.

Protection

MaxiTRANS directs its employees, officers, contractors or agents to refrain from subjecting a Discloser to any form of actual or threatened retaliatory action, victimisation, discrimination, harassment, or prejudice, because they have made a Report, considered making a Report or participated in any subsequent investigation (**Reprisal**), even if the Discloser is implicated in the Potential Wrongdoing.

An employee or officer of MaxiTRANS who engages in or facilitates any form of Reprisal against a Discloser, or discourages the making of, or refuses to accept or action, any Report, will be subject to appropriate disciplinary action which may include suspension or termination of employment.

If you make a Protected Disclosure, certain protections apply at law: *for further information on Protected Disclosures, read Attachment A.*

Support

A Discloser may access the Employee Assistance Program (EAP) provided by independent counselling service, Converge, which is accessible at any time by telephoning 1300 687 327.

Other support may include, at MaxiTRANS' discretion:

- Monitoring and managing the behaviour of other employees;
- Relocating employees (which may include the person or persons alleged to have been involved in the Potential Wrongdoing) to a different division, group or office;
- Offering a leave of absence or flexible workplace arrangements while a Report is investigated;
- Rectifying any detriment that a Discloser has suffered; or
- Providing an ongoing internal support person.

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MaxiTRANS will seek to support any person who Speaks Up but it will not be possible to provide every Discloser with the same type and level of support (because for example, MaxiTRANS itself could not offer flexible workplace arrangements to a supplier or to an anonymous Discloser as their identity is unknown).

G: Fair treatment of others

MaxiTRANS will ensure fair treatment of, and provide support to, any person who is implicated in or the subject matter of a Report and anyone conducting or assisting in an investigation by:

- directing its employees, officers, contractors or agents to refrain from subjecting any person to any form of actual or threatened retaliatory action, victimisation, discrimination, harassment, or prejudice, because a person is implicated in or the subject matter of any Report (or has been a witness to any Potential Wrongdoing, or has conducted or assisted with, any investigation). An employee or officer of MaxiTRANS who breaches this prohibition will be subject to appropriate disciplinary action up to and including suspension or termination of employment.
- Instructing the investigator to investigate without any pre-determined outcome in mind and to remove unconscious bias from the investigation process.
- Unless there are confidentiality or other reasons not to do so, any person who is implicated in or the subject matter of a Report will be informed of any allegations made against them and offered the opportunity to respond (however they are not obliged to do so).
- **Any persons implicated in a Report or involved in investigation of a Report may access MaxiTRANS' Employee Assistance Program provided by independent counselling service, Converge, which is accessible at any time by telephoning 1300 687 327.**

H: Disclosure

Information about a Discloser's identity or information that is likely to lead to the identification of the Discloser may be disclosed in the following circumstances:

- to the extent that the Discloser has consented to any disclosure;
- as may be allowed or required by law or is made to a legal practitioner for the purpose of obtaining legal advice or representation;
- to ASIC, APRA or a member of the Australian Federal Police;
- to a Commonwealth, State or Territory authority for the purpose of assisting the authority in the performance of its functions or duties; and
- in the case of information that is likely to lead to the identification of the Discloser, if it is reasonably necessary to disclose that information for the purposes of an investigation, but all reasonable steps will be taken to prevent any person figuring out the identity of the Discloser.

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ATTACHMENT A – AUSTRALIA

Certain legislative protections are available if a Protected Disclosure is made. In this context, **Protected Disclosure** means anyone who is, or has been, an employee, director, officer, contractor, supplier, associate or consultant of MaxiTRANS, or a relative or spouse of any of those persons doing any of the following:

1. Making a report to an “Eligible Recipient” about any of the following:
 - a. Information about misconduct, or an improper state of affairs or circumstances in relation to MaxiTRANS or any of its related body corporate; or
 - b. Information that MaxiTRANS or any of its related body corporate, or any officer or employee of MaxiTRANS or a related body corporate respectively, has engaged in conduct that:
 - i. contravenes or constitutes an offence against certain legislation (e.g. the Corporations Act);
 - ii. represents a danger to the public or the financial system; or
 - iii. constitutes an offence against any law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more.

Eligible Recipient means:

- A person authorised by MaxiTRANS to receive disclosures under the Speaking Up Policy.
 - An officer or senior manager of MaxiTRANS or its related body corporate.
 - An auditor, or a member of an audit team conducting an audit, of MaxiTRANS or of a related body corporate.
 - An actuary of MaxiTRANS or of a related body corporate.
 - ASIC or APRA.
 - A legal practitioner for the purpose of obtaining legal advice or legal representation.
2. Making a “public interest” disclosure of any of the information referred to in paragraph 1 above to a member of any Parliament or a journalist if the following circumstances ALL apply:
 - c. you previously made a report to MaxiTRANS consistent with the Speaking Up policy; AND
 - d. at least 90 days has passed since you made that report; AND
 - e. you do not have reasonable grounds to believe that action is being, or has been, taken to address the matters to which the previous disclosure related; AND
 - f. you have reasonable grounds to believe that making a further disclosure is in the public interest; AND
 - g. at the end of the 90 day period, you gave written notice to MaxiTRANS which included sufficient information to identify the previous disclosure that was made, and stated that you intend to make a public interest disclosure; AND
 - h. the extent of the information disclosed in the public interest disclosure was no greater than is necessary to inform the member of Parliament or journalist about the wrongdoing.
 3. Making an “emergency” disclosure of any of the information referred to in paragraph 1 above to a member of any Parliament or journalist if the following circumstances ALL apply:

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- a. you previously made a report to MaxiTRANS consistent with the Speaking Up policy;
AND
- b. you have reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment; AND
- c. you gave written notice to MaxiTRANS which included sufficient information to identify the previous disclosure that was made, and stated that you intent to make an emergency disclosure; AND
- d. the extent of the information disclosed in the public interest disclosure was no greater than is necessary to inform the member of Parliament or Journalist about the substantial and imminent danger.

The protections available under legislation include:

- You cannot be subjected to any civil, criminal or administrative liability (including disciplinary action) for making the disclosure;
- A contractual or other remedy may not be enforced or exercised against on you the basis of the Protected Disclosure; and
- In some circumstances (e.g. if the disclosure has been made to a regulator), the information you provide is not admissible in evidence against you in criminal proceedings or in proceedings for imposing a penalty, other than proceedings in respect of the falsity of the information.
- Additional remedies under legislation including compensation for loss, damage or injury as a result of detrimental conduct or injunctions / court orders.

You may wish to seek your own independent legal advice before making a Protected Disclosure.

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PART B – NEW ZEALAND

IF YOU ARE BASED IN AUSTRALIA GO TO PART A

A: What to “Speak Up” about?

MaxiTRANS wants everyone to feel safe, supported and encouraged to “Speak Up” about Potential Wrongdoing. In this context, Potential Wrongdoing means:

1. Any Serious Wrongdoing in or by MaxiTRANS
2. Unlawful, corrupt or irregular use of public money or resources;
3. Conduct that poses a serious risk to public health, safety, the environment or the maintenance of law; or
4. Any criminal offence.

Examples of Potential Wrongdoing include:

- Breach of laws or regulations
- Fraud or mismanagement of MaxiTRANS’ finances
- Bribery or corruption
- Anti-competitive behaviour
- Any breach of the ASX Listing Rules
- Unauthorised access to or use of MaxiTRANS’ confidential information
- Concealing any of the above or other Potential Wrongdoing

Any personal employment-related grievance is **not** covered by this Policy.² Employment grievances should be notified and will be addressed via the dispute resolution procedures of any applicable industrial instrument and/or the MaxiTRANS Conflict Resolution Procedure.

B: Who should Speak Up?

MaxiTRANS encourages any person who is aware of Potential Wrongdoing in connection with MaxiTRANS to “Speak Up” by making a report under this Policy (**Report**). This includes a current or former employee of MaxiTRANS (which includes homeworkers (as defined by section 5 of the Employment Relations Act 2000), contractors, people seconded to MaxiTRANS or volunteers) (called in this Policy **Disclosers**)

C: Who can you Speak Up to?

You are encouraged to “Speak Up” to FairCall, an independent service run by KPMG which is available in multiple languages and can be contacted by:

² An employment-related concern should be reported under this policy if it (a) concerns any detriment or reprisal, or a threat made, to a MaxiTRANS employee who made, or was considering making, or was suspected to have made or been considering making, a Report under this policy, or (b) in Australia, concerns either (i) a work related concern that extends beyond the Discloser personally and which has significant implications for MaxiTRANS or (ii) a disclosure to a legal practitioner for the purposes of obtaining legal advice or representation in relation to the operation of the law about whistleblowers.

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- **By phone (toll free): Dial 0800 100 526**
- **By email: faircall@kpmg.com.au**

A Report can also be made to:

- MaxiTRANS' General Counsel; or
- Any of the people or regulators described in Attachment A.

D: What to do when Speaking Up

When making a Report:

- A Discloser should provide as much information as possible, including details of the Potential Wrongdoing, people involved, dates, locations and any other evidence of which you are aware. Physical evidence, if any, can be provided too (e.g. emails).
- FairCall (or other person receiving your Report) will seek the Discloser's consent (i) before requesting any personal details (such as a name) and (ii) consent to disclose personal information for purposes associated with discharging this Policy (including any investigation into a Report) or satisfying MaxiTRANS' obligations at law in connection with a Report.

A REPORT UNDER THIS POLICY CAN BE MADE ANONYMOUSLY so you do not have to agree to provide your name (and an anonymous Discloser is still entitled to protections available under law if a Protected Disclosure is made).

A Discloser must have reasonable grounds to suspect that the information being disclosed is true or likely to be true, but you will not be penalised if it turns out to be incorrect or cannot be substantiated.

A person must not make a false or malicious Report – knowingly making a false or malicious Report is a breach of the MaxiTRANS Code of Conduct and for a MaxiTRANS employee or officer may result in disciplinary action (up to and including termination of employment).

E: How MaxiTRANS will respond

All Reports will be received and treated sensitively and seriously, and will be dealt with, and if necessary, investigated, promptly, fairly and objectively.

Following a Report, either internally or externally, the following will occur:

- i. The completed Fair Call report and/or other information provided as the Report will be sent to the MaxiTRANS General Counsel (**GC**).
- ii. The GC will review the information received and commence an investigation in accordance with the Procedure.

If the GC is the subject of any Report, MaxiTRANS' Managing Director will assume the GC's responsibilities under this section and Schedule 2 (and for the purposes of that Report, under the Policy generally).

All people (including a Discloser, even if anonymity has been requested) must keep the Report and any investigative process confidential at all times and refrain from discussing the matter with any unauthorised persons. Information provided by a Discloser when making a Report and provided by any

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person in the course of an investigation may be disclosed by MaxiTRANS in certain circumstances as outlined in the Procedure.

F: Protection for those who “Speak Up”

Confidentiality

Where the Discloser has not elected anonymity, information about a Discloser’s identity or information that is likely to lead to the identification of the Discloser will be kept confidential at all times, except to the extent that the Discloser has consented otherwise or any of the exceptions outlined in the Procedure apply.

Protection

MaxiTRANS directs its employees, officers, contractors or agents to refrain from subjecting a Discloser to any form of actual or threatened retaliatory action, victimisation, discrimination, harassment, or prejudice, because they have made a Report, considered making a Report or participated in any subsequent investigation (**Reprisal**), even if the Discloser is implicated in the Potential Wrongdoing.

An employee or officer of MaxiTRANS who engages in or facilitates any form of Reprisal against a Discloser, or discourages the making of, or refuses to accept or action, any Report, will be subject to appropriate disciplinary action which may include but is not limited to suspension or termination of employment.

If you make a Protected Disclosure, certain protections apply at law: *for further information on Protected Disclosures, read Attachment A.*

Support

A Discloser may access the Employee Assistance Program (EAP) provided by independent counselling service, Converge, which is accessible at any time by telephoning 0800 100 526.

Other support may include, at MaxiTRANS’ discretion:

- Monitoring and managing the behaviour of other employees;
- Relocating employees (which may include the person or persons alleged to have been involved in the Potential Wrongdoing) to a different division, group or office;
- Offering a leave of absence or flexible workplace arrangements while a Report is investigated;
- Rectifying any detriment that a Discloser has suffered; or
- Providing an ongoing internal support person.

MaxiTRANS will seek to support any person who Speaks Up but it will not be possible to provide every Discloser with the same type and level of support (because for example, MaxiTRANS itself could not offer flexible workplace arrangements to a supplier or to an anonymous Discloser as their identity is unknown).

G: Fair treatment of others

MaxiTRANS will ensure fair treatment of, and provide support to, any person who is implicated in or the subject matter of a Report and anyone conducting or assisting in an investigation by:

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- directing its employees, officers, contractors or agents to refrain from subjecting any person to any form of actual or threatened retaliatory action, victimisation, discrimination, harassment, or prejudice, because a person is implicated in or the subject matter of any Report (or has been a witness to any Potential Wrongdoing, or has conducted or assisted with, any investigation). An employee or officer of MaxiTRANS who breaches this prohibition will be subject to appropriate disciplinary action up to and including suspension or termination of employment.
- instructing the appointed investigator to investigate without any pre-determined outcome in mind and to remove unconscious bias from the investigation process.
- Unless there are confidentiality or other reasons not to do so, any person who is implicated in or the subject matter of a Report will be informed of any allegations made against them and offered the opportunity to respond (however they are not obligated to do so).
- **Any persons implicated in a Report or involved in investigation of a Report may access MaxiTRANS' Employee Assistance Program provided by independent counselling service, Converge, which is accessible at any time by telephoning 1300 687 327.**

H: Disclosure

Information about a Discloser's identity or information that is likely to lead to the identification of the Discloser may be disclosed in the following circumstances:

- to the extent that the Discloser has consented to any disclosure; and
- if disclosure is essential for the effective investigation of the Report, to prevent serious risk to public health and safety or the environment, or to comply with the principles of natural justice.

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ANNEXURE A – NEW ZEALAND

Any current or former employee of MaxiTRANS which includes homeworkers (as defined by section 5 of the *Employment Relations Act 2000* (NZ)), contractors, people seconded to MaxiTRANS or volunteers doing any of the following:

1. Making a report in accordance with the Speaking Up policy about any of the following:
 - a. Serious Wrongdoing in MaxiTRANS;
 - b. Conduct that poses a serious risk to public health, safety, the environment; or
 - c. Conduct that seriously risks the maintenance of the law, including the right to a fair trial, and the prevention, investigation and detection of offences; or
 - d. Any criminal offence.
2. Making a report of any of the matters referred to in paragraphs (2)(a)(i) to (iv) above to MaxiTRANS' Managing Director (or his delegate for this purpose, MaxiTRANS' General Counsel) if you believe on reasonable grounds that (i) the person you're required to report the wrongdoing to in accordance with the Speaking Up Policy is or may be involved in the wrongdoing, or (ii) it's not appropriate to report the wrongdoing to that person because of their relationship or association with the alleged wrongdoer.
3. Making a report of any of the matters referred to in paragraphs (2)(a)(i) to (iv) above to an Appropriate Authority if you reasonably believe:
 - a. That MaxiTRANS' Managing Director is or may be involved in the serious wrongdoing; and
 - b. It is justified because of the urgency of the matter to which the disclosure relates, or some other exceptional circumstances; or
 - c. You've already made the disclosure within MaxiTRANS, but there's been no action or recommended action within 20 working days.

Appropriate Authority includes:

- The Ombudsman
- The Commissioner of Police
- The Controller and Auditor-General
- The Director of the Serious Fraud Office
- The Inspector-General of Intelligence and Security
- The Parliamentary Commissioner for the Environment
- The Independent Police Conduct Authority
- The Solicitor-General
- The State Services Commissioner
- The Health and Disability Commissioner
- The head of every public sector agency
- The heads of certain private sector professional bodies with the power to discipline their members

Also, to obtain relevant legislative protections in New Zealand, the following must apply:

- You want the Serious Wrongdoing to be investigated.

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- You must not be acting in bad faith (for example, by knowingly making a false report).
- The information being disclosed must not be protected by legal professional privilege.

The protections available under legislation include:

- No civil, criminal, or disciplinary proceedings can be taken you.
- If you suffer retaliatory action from your employer for making a Protected Disclosure, you can take personal grievance proceedings under the *Employment Relations Act* (NZ).
- It is also unlawful under the *Human Rights Act* to treat whistle-blowers or potential whistle-blowers less favourably than others in the same or similar circumstances and if you are victimised in this way, there may be legal remedies available under the *Human Rights Act*.

You may wish to seek your own independent legal advice before making a Protected Disclosure.

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PART C – PROCEDURE

This Procedure applies to Australia and New Zealand

PURPOSE

This Procedure supplements the information and processes outlined in MaxiTRANS' Speaking Up! Policy.

SCOPE

This Procedure applies to all those involved in the conduct of MaxiTRANS' business and to all of its brands and operations in every location.

DETAILS

Relevant definitions are defined below and also in the Speaking Up Policy (**Policy**).

What happens when someone "Speaks Up" to Faircall

If a Report is made to Faircall:

- Calls will be taken on recognised business days between 8am and 6pm (AEST). However the telephone number is monitored outside of these hours.
- A Report to FairCall is confidential and personal details will not be taken if the Discloser wishes to remain anonymous³.
- A report will be prepared and provided by FairCall to the designated MaxiTRANS representative within 24 hours.

What happens if a Report is anonymous?

If a Report is made anonymously:

- MaxiTRANS' GC will assess the information provided in the same way as if the Discloser had revealed their identity, and an investigation (if one is needed) will be conducted as best as possible in the circumstances. However, an investigation may be more difficult if the Discloser's identity is not known to MaxiTRANS.
- It will not be possible to offer an anonymous Discloser the same level of practical support that might otherwise be available because the Discloser's identity is not known to MaxiTRANS.

³ Where KPMG collects personal information as part of the FairCall service, it does so in accordance with KPMG Australia's Privacy Statement: <https://home.kpmg/au/en/home/misc/privacy-faircall.html>

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Investigation Procedures

- i. If the GC has decided to undertake an investigation into a Report, the GC will determine:
 - a. The appropriate manner of investigation (including whether or not any investigation and subsequent report is required for the dominant purpose of enabling MaxiTRANS to obtain legal advice).
 - b. Who (internally or externally) will conduct the investigation.
 - c. What resources are needed and secure access to those resources, including where necessary the assistance of other employees or external professional help (such as lawyers, accountants, forensic analysts or operational experts).
 - d. Issue instructions for the investigation to be undertaken.
- ii. Any person appointed to investigate and those involved in any decision making role in relation to the Report must have had no alleged involvement in the Potential Wrongdoing.
- iii. All employees and contractors must cooperate fully with any investigation under this policy including by providing records, making themselves available to answer questions and providing signed statements (provided always that in accordance with accepted principles of procedural fairness, any person who is implicated or the subject of a Report, may decline to answer questions or sign any statement).
- iv. Any person appointed to investigate will plan and conduct the investigation, subject to general oversight from the GC. Investigations must:
 - a. Proceed confidentially, fairly and promptly.
 - b. Proceed on the basis that everyone is entitled to a presumption of innocence.
 - c. Take all reasonable steps to keep the Discloser anonymous, if required.
- v. All Reports will be recorded by the GC in a register which will be kept confidential to the GC and other senior executives or staff of MaxiTRANS involved in its governance and compliance matters.
- vi. The GC will report to the Board regularly with a summary of Reports made and will provide additional information about material incidents raised in any Report.

What happens after an investigation?

The results of any investigation will be recorded in writing in a formal internal report. This document will be addressed to the GC and is confidential to and the property of MaxiTRANS and must:

- Detail the Report which was made;
- Describe the investigation in enough detail to allow the GC to assess its adequacy;
- Set out the conclusions that the investigator reached as a result of the investigation; and
- Attach any relevant supporting material including witness statements (if any).

The GC will:

- Consider the formal internal report;

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- Assess (and if necessary, seek advice on) any process/control improvements (risk assessments, audits, etc.) which are prudent or necessary as a result of matters arising from the investigation; and
- Regularly provide the Board with a summary of Reports made under this policy, including metrics of the disclosures made, and any process/control improvements. (At the GC's discretion, the Board will be provided with additional information on a regular basis, about material incidents raised.)

A Discloser or any person or persons who were the subject matter of a Report will be informed of the investigation outcome, if confidentiality permits and if MaxiTRANS otherwise considers it appropriate to do so having regard to the principles of natural justice and its obligations at law.

However, the formal report recording the results of an investigation will not be provided to a Discloser or any other person subject to or involved in an investigation.

Where an investigation identifies a breach of MaxiTRANS' Code of Conduct or internal policies or procedures or law, appropriate disciplinary action may be taken, up to and including termination of any contract of supply or engagement or in the case of an employee, suspension or termination employment.

Disclosure by MaxiTRANS

Information provided by a Discloser when making a Report and provided by any person in the course of an investigation, will be kept strictly confidential, except to the extent that disclosure is:

- Required for the purpose of the dealing with the Report, investigating it or implementing remedial measures;
- Made to any lawyer or professional adviser so that MaxiTRANS can obtain advice for the purpose of dealing with a Report, investigating it or implementing remedial measures; or
- Required by law or any ASX Listing Rules.

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Awareness and Training

A copy of this Policy (and its Procedure) will be available to on MaxiTRANS' website.

MaxiTRANS will provide training for employees about the Policy and their rights and obligations under it and provide training to any key employee who may receive Reports under this Policy about how to respond to them.

This Policy (and its Procedure) do not form part of any terms of employment but employees and officers of MaxiTRANS are required to follow all directions in such documents.

Breaches of this Policy

Alleged breaches of this Policy (or its Procedure) will be taken seriously and investigated. Substantiated breaches may result in disciplinary action up to and including termination of employment.

Monitoring, evaluation and review

MaxiTRANS may change, apply or withdraw this Policy (or its Procedure) in its discretion at any time.

This Policy will be reviewed at least annually, or upon legislative change to ensure it remains current and applicable.

Associated documents

Where MaxiTRANS collects Personal information for purposes associated with this Policy (or its Procedure), it does so in accordance with its Privacy Policy.

Related documents include:

- MaxiTRANS Code of Conduct
- MaxiTRANS Conflict Resolution Procedure
- MaxiTRANS Privacy Policy
- MaxiTRANS Speaking Up Procedure

Further information

If you have questions about this Policy (or its Procedure) or need advice about "Speaking Up" at any time, contact a member of MaxiTRANS' internal legal team.