

## WHISTLE BLOWER POLICY

### POLICY STATEMENT

Any employee of Arvida that becomes aware of a serious wrongdoing within the organisation, is encouraged to report it.

In order to claim the protections provided under the Protected Disclosures Act 2000 (the “Act”), the employee is required to follow the protected disclosure process set out in the steps below.

### MEANING OF SERIOUS WRONGDOING

Serious wrongdoing is conduct of serious concern to the employee and includes (but is not limited to) actions or conduct which:

- Puts any person’s health or safety at risk;
- Is corrupt, fraudulent or unlawful; or
- Is in breach of Arvida’s Code of Ethics.

### REPORTING OF SERIOUS WRONGDOING

#### STEP 1 – DISCLOSURE TO MANAGER

The employee should, in the first instance, disclose any serious wrongdoing to their direct manager to investigate. Such a disclosure should be in writing and should be as specific as possible including (where possible):

- Names;
- Dates;
- Actions/ omissions; and
- Any supporting information/ evidence.

#### STEP 2 – DISCLOSURE TO SENIOR EXECUTIVE

If either:

- The manager has taken no action within a reasonable timeframe; or
- The employee believes on reasonable grounds that their Manager may be involved in the serious wrongdoing,

they may disclose the information instead directly to the CEO or the General Manager Human Resources.

#### STEP 3 – DISCLOSURE TO CHAIRPERSON

If the employee believes the CEO or a Director may be involved in serious wrongdoing, the employee may raise his or her concern directly with the Chairperson of the Board. If the employee believes the Chairperson of the Board may be involved in the serious wrongdoing, the disclosure may be made to the chairperson of the Audit and Risk Committee.

## WHISTLE BLOWER HOTLINE

At any time, if the employee believes on reasonable grounds there is serious wrongdoing, they may register their concern with a third party external to Arvida at the “Speak Up Hotline” (0800 000 457) or online at <https://eapworks.co.nz/whistleblower-hotline/>.

## INVESTIGATION

Once suspected serious wrongdoing has been reported, the person receiving the report will consider the information made available and decide on the type of investigation to be undertaken.

## PROTECTIONS

Protection under the Act may be claimed by the employee if the report relates to serious wrongdoing in or by Arvida, and the employee:

- Reports the concern to the appropriate Arvida person set out above or the independent WHISTLE BLOWER HOTLINE reporting service;
- Believes that the information is true or likely to be true;
- Wants that information investigated; and
- Indicates that disclosure of that information is to be protected under the Act.

## REQUIREMENT TO ACT IN GOOD FAITH

The protections offered by the Protected Disclosures Act 2000 and this Policy do not apply where the employee makes a disclosure, they know to be false or otherwise acts in bad faith. Allegations made maliciously or in bad faith may result in disciplinary action.

## CONFIDENTIALITY

Arvida representatives to whom a protected disclosure is made or referred will use their best endeavours not to disclose information that might identify the employee who made the protected disclosure unless:

- That employee consents in writing to the disclosure of that information; or
- Where identification of the employee:
  - a) is essential to the investigation of the allegation;
  - b) is essential to prevent serious risk to any person’s health or safety; or
  - c) is essential having regard to the principles of natural justice.

Arvida is committed to following up on all concerns of serious wrongdoing raised, whether they are made to an Arvida person or through the independent WHISTLE BLOWER HOTLINE. Concerns will be escalated to senior managers, the CEO, Board or government authorities if and as appropriate.