

Whistleblower Policy

V3.1
June 2025

Overview

The Pharmaceutical Society of Australia Limited (PSA) is committed to fostering a 'speak up' culture aligned with our company values, guiding ethical and transparent conduct across all levels of the organisation. This policy forms a key element of PSA's integrity and governance framework.

Purpose

This policy outlines PSA's approach to:

- Encouraging disclosure of unethical, illegal, or improper conduct.
- Providing protections to whistleblowers.
- Investigating and addressing disclosures.
- Ensuring fair treatment for individuals mentioned in disclosures.
- Maintaining high standards of corporate governance and accountability.

Scope

This policy applies to all eligible whistleblowers, including:

- Current and former PSA employees, officers, directors.
- Contractors, suppliers, consultants and their employees.
- Volunteers
- PSA auditors and actuaries (associates of PSA).
- Relatives, dependents, and spouses of the above.

Definitions

- **Disclosable Matter:** Conduct that is dishonest, unethical, illegal, fraudulent, oppressive, negligent, or a danger to public or financial systems.
- **Detriment:** Harm or disadvantage caused to a whistleblower due to their disclosure.

Governance & Oversight

- The Governance, People & Culture (GPC) Committee oversees the effectiveness of this policy, ensuring compliance with legal obligations.
- Annual reviews will assess the policy's effectiveness, adequacy of reporting channels, and awareness levels across the organisation.

What Can Be Reported

Reportable Conduct

- Criminal offences.
- Breach of legal or regulatory obligations.
- Corrupt, fraudulent or dishonest conduct.
- Misuse of PSA resources.
- Serious mismanagement or unethical behaviour.
- Behaviour posing danger to health, safety, or environment.

What Is Not Reportable

Personal work-related grievances (e.g. interpersonal conflicts, transfer decisions) do not qualify unless they have broader implications or are linked to reportable conduct.

Making a Disclosure

Internal Channels (Authorised Recipients)

- PSA Board Chair: president@psa.org.au
- Chief Executive Officer: ceo@psa.org.au
- Company Secretary: company.secretary@psa.org.au
- Alternatively, disclosures may be made to PSA auditors (see *Annual Report*); or
- In writing to: Level 1, 17 Denison Street, DEAKIN ACT 2600, Australia

External Channels

- ASIC, APRA, Commissioner of Taxation, or prescribed Commonwealth authorities.
- Health ombudsman and AHPRA.
- Legal practitioners for legal advice.

Anonymous Disclosure

The organisation accepts and will assess anonymous disclosures; however, it is important to note that investigations arising from anonymous disclosures may be limited or less effective. This is due to the inability to seek clarification, request additional information, or provide updates to the discloser. While every effort will be made to assess and act on the information provided, the capacity to fully investigate and resolve concerns may be impacted.

Investigation of Disclosures

Prompt Assessment by Qualified Personnel

All disclosures received under this policy will be assessed promptly and impartially by a qualified and appropriately authorised person. The assessment will determine whether the disclosure qualifies for protection under the relevant legislation (e.g., the Corporations Act 2001 (Cth)) and whether an investigation is warranted.

Investigation Process

Where an investigation is required, it will be conducted in a timely, thorough, and objective manner. Investigations may be carried out by an internal officer with the appropriate expertise, or referred to an external investigator to ensure independence and impartiality. The scope, approach, and timelines of the investigation will depend on the nature and complexity of the matters raised.

Communication with Whistleblowers

Where the identity of the whistleblower is known and consent has been provided, the organisation will acknowledge receipt of the disclosure within a reasonable timeframe and, where appropriate, provide updates during key stages of the process. This may include confirmation when the investigation has commenced and concluded. However, to protect confidentiality and the integrity of the process, detailed outcomes may not always be shared.

Procedural Fairness

The principles of procedural fairness (natural justice) will be observed for all individuals involved. This includes ensuring that:

- Any person who is the subject of a disclosure is given a fair opportunity to respond to allegations before any adverse findings are made;
- Investigations are conducted without bias or conflict of interest;
- Evidence is gathered and assessed objectively;
- Decisions are based on relevant facts and evidence.

PSA is committed to protecting the rights of all parties involved and ensuring that disclosures are handled responsibly, ethically, and in accordance with applicable laws.

Protections and Support

Whistleblowers who make a qualifying disclosure are entitled to:

- Confidentiality: Their identity will be protected and not disclosed without consent (except to regulators or lawyers).

- Protection from Detriment: It is unlawful to threaten, harass, demote, terminate, or discriminate against someone because they made a disclosure.
- Immunity: They are protected from civil, criminal, or administrative liability related to the act of making the disclosure.

Any individual found to have victimised a whistleblower may face disciplinary action, including termination.

Vexatious or Misleading Reports

Disclosures must be based on objectively reasonable grounds. Malicious or knowingly false reports may result in disciplinary action.

Other Legal Rights

Employees may have protection under the Fair Work Act 2009.

Support Services

- PSA's Employee Assistance Program (1300 360 364).
- Lifeline (13 11 14), Beyond Blue (1300 22 4636).
- People & Culture may assign a support contact if required.

Fair Treatment of Individuals Mentioned in Disclosures

- Individuals will be informed and given a chance to respond where appropriate.
- Disciplinary action will only follow substantiated findings through due process.

Promoting Awareness and Culture

- Regular communication will promote awareness of whistleblower protections.
- This policy will be available on the PSA intranet and Employment Hero.

Review and Updates

- This policy will be reviewed biennially or sooner if legislative changes occur.
- Policy maintained by the GPC Committee.

Related Documents

- Fraud Policy
- Workplace Dispute & Resolution Policy
- Respect@PSA Policy Suite
- Risk Management Framework

Version control log

Policy authorised by:	PSA Board
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Policy maintained by:		GPC Committee	
Version	Date	Changes/Notes	Proposed Review Date
1.0	22/03/2018	New	22/03/2018
2.0	5/12/19	Replacement in light of national Whistleblower legislative amendments	01/01/2022
3.0	27/03/2023	Updated with workplace legislative requirements and other policies	27/03/2025
3.1	06/2025	Revised per AICD, GIA, and ASIC RG270 guidance	06/2027