Purpose

PetraClean is committed to transparency and to fostering an environment where people feel safe to report legitimate concerns about our operations. This Policy explains who is protected, what can be reported, how to report (including anonymously), how PetraClean will handle and investigate disclosures, and how whistleblowers are protected from detriment.

This Policy is guided by the *Corporations Act 2001* (Cth) and associated regulations.

Scope

This Policy applies to current and former:

- Employees (full-time, part-time, and casual),
- Officers and senior managers,
- Contractors and subcontractors (including employees of contractors),
- Consultants, suppliers and service providers (and their employees),
- Associates, and
- Relatives, dependants or spouses of any person listed above.

Key definitions

Whistleblower: A person who makes a disclosure about Disclosable Conduct under this Policy.

Eligible Whistleblower: A person who qualifies for legal protection under the Corporations Act when making a disclosure.

Disclosable Conduct: Suspected misconduct, or an improper situation or circumstances, in relation to PetraClean.

Detriment: Any adverse action against a person because they made, or are suspected to have made, a disclosure (e.g., dismissal, demotion, harassment, discrimination, injury, damage to property/reputation, or threats of any of these).

Eligible Recipient: A person or body authorised by law to receive protected disclosures.

What can be reported (Disclosable Conduct)

Examples include (without limitation):

- Dishonest, fraudulent or corrupt behaviour (including bribery);
- Theft, violence or criminal damage;
- Breaches of the Corporations Act, Competition and Consumer laws, Fair Work laws, Privacy laws or other State/Federal laws;
- Insider trading or market misconduct (if applicable);
- Conflicts of interest, abuse of authority, or serious misconduct;
- Conduct that represents a danger to the public or the financial system;
- Intentional concealment or destruction of evidence relating to the matters above.

What is not Disclosable Conduct

Personal work-related grievances (e.g., interpersonal conflicts, decisions about employment or discipline) generally are not covered unless they involve victimisation for whistleblowing, systemic issues, a breach of law, or significant risks to health and safety.

Good-faith and reasonable grounds

Disclosures should be based on reasonable grounds (i.e., a reasonable person in the whistleblower's position would suspect misconduct). Whistleblowers do not need to prove their allegations. Knowingly false reports may lead to appropriate action under PetraClean's disciplinary procedures.

How to report a concern

Reports can be made confidentially or anonymously, 24/7, via any of the channels below. Whistleblowers are encouraged (but not required) to report internally first so PetraClean can address concerns promptly.

Internal Eligible Recipients

- Jonathan Billington, Director
  Phone: 0459 190 020
  Email: jonathan@petraclean.com.au

- Catarina Forzatti, HR Manager
  Phone: 0437 312 096
  Email: catarina@petraclean.com.au

External Eligible Recipients

- ASIC (Australian Securities & Investments Commission) – ***Report misconduct to ASIC - website link***
  or 1300 300 630
- Fair Work Commission – 1300 799 675 (for industrial relations matters within remit).

Anonymous reporting

- PetraClean offers an online way to share concerns. You can remain anonymous—no name or email is required
  Submit a concern here

Confidentiality

PetraClean will not disclose a whistleblower's identity or information likely to identify them, except where permitted by law (e.g., to ASIC, APRA, AFP, or a legal practitioner). All records will be stored securely with restricted access. Unauthorised disclosure may attract criminal and civil penalties.

How PetraClean will handle and investigate disclosures

1. **Triage** - An Eligible Recipient will assess whether the disclosure is Disclosable Conduct and whether urgent risk controls are required.
2. **Assign** - A qualified internal or external investigator will be appointed. Where appropriate, HR may be consulted.
3. **Investigate** - The investigation will be fair, proportionate and confidential. Relevant parties may be interviewed and given an opportunity to respond.
4. **Outcome** - Findings will be documented with recommendations for action. Subject to legal, privacy and confidentiality limits, the whistleblower will be informed of progress and outcome.

Indicative timelines

- Acknowledge receipt: within 7 calendar days (where contact is possible)
- Investigation: aim to conclude within 90 days, or advise if more time is needed

Protections for whistleblowers

Under the Corporations Act, eligible whistleblowers are protected from:

- Detriment (victimisation). PetraClean prohibits and will act against any threatened or actual detriment; and
- Certain legal actions related to making a protected disclosure (e.g., breach of confidentiality). Note: whistleblowers are not protected from the consequences of their own misconduct.

Support measures may include: EAP referral, adjustments to duties or location, leave/rostering changes, and managerial support.

Training & awareness

PetraClean will provide periodic training to any person likely to receive disclosures. Awareness materials will be made available to all workers and contractors.

Responsibility and review

PetraClean's management is responsible for implementing and maintaining Company Policies. All employees and contractors are required to understand and comply with this Policy and seek clarification if required.

This policy will be reviewed annually and updated as required to ensure it remains relevant to PetraClean's operations and customer needs.

Created / Updated by:	C Forzatti		
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Revised / Updated:	27/09/2025		
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Approved by:	J Billington		28/09/2025