



SCH-COR-PRO-001

Whistleblower Procedure

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Revision	Issued Date	Originator	Reviewer	Approved

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1.0 INTRODUCTION

1.1 Purpose

Schlam Payload (the 'Company') has zero tolerance for behaviour that does not comply with our commitments and policies or our legislative and legal obligations. Reports of wrongdoing are taken seriously and dealt with in accordance with Australian legal requirements. The courage of whistleblowers is respected for helping us to maintain a safe, ethical, and compliant workplace.

This procedure outlines how the Company's Whistleblower Policy (the 'Policy') is implemented.

2.0 DEFINITIONS & ABBREVIATIONS

2.1 Definitions

Term	Definition
Company/Principal	Schlam
Schlam	Schlam Payload Solutions (DT HiLoad)
Shall	Used through this document as a directive, compulsory to the action involved

2.2 Abbreviations/Acronyms

Acronym	Definition
Etc.	Etcetera
i.e.	For example

3.0 ROLES & RESPONSIBILITIES

It is the responsibility of all personnel to familiarise themselves with the roles and responsibilities under the Whistleblower Procedure. Specific responsibilities are assigned to the following roles:

Role	Responsibility
Management	<ul style="list-style-type: none"> • Familiarise themselves and comply with this procedure • Ensure this procedure is available and implemented in their area of responsibility and operation. • Ensure there are sufficient resources available to conduct Whistleblower Procedure in a safe manner. • Ensure all personnel are aware of the Whistleblower Procedure • Ensure this procedure is reviewed regularly to confirm that it is applicable to the Whistleblower Policy
Supervision	<ul style="list-style-type: none"> • Familiarise themselves and comply with this procedure • Ensure this procedure is available and implemented in their area of responsibility and operation.
Employees	<ul style="list-style-type: none"> • Familiarise themselves and comply with this Whistleblower Procedure • Use the process defined by the Whistleblower Procedure to make a disclosure • Take reasonable care for themselves, and others' health and safety while conducting Whistleblower Procedure activities.

4.0 REPORTING

4.1 How to Report

Eligible Whistleblowers make disclosures directly to one of the Company's Eligible Recipients.

When making a disclosure, as much information as possible should be provided including details of the matter, the people involved, dates, locations and whether documented evidence is available.

Whistleblowers will be expected to have reasonable grounds to suspect or believe the information reported is true and relates to a disclosable matter as defined by the Policy. On this basis, they will qualify for protection under the Corporations Act even if the disclosure turns out to be incorrect.

Whistleblowers must not knowingly make a disclosure that is untrue. This is a serious breach of the Company's Code of Conduct and may result in disciplinary action or incur legal consequences.

4.2 Eligible Recipients and disclosure channels

The Company offers both internal and external alternatives for making disclosures.

- **Internal Eligible Recipients**

Eligible Whistleblowers can make contact directly with one of the internal Eligible Recipients below.

Eligible Recipient	Title	Email
Danielle Lazarov	Chief Human Resources Officer	Danielle.lazarov@schlam.com
Tim Martin	EGM Health Safety and Environment	Tim.martin@schlam.com
Jodie Meadows	Chief Financial Officer	Jodie.meadows@schlam.com

These disclosures may be made confidentially by direct email.

- **External Eligible Recipients**

Acknowledging that some matters may be sensitive and some Eligible Whistleblowers may prefer to contact an independent party, Schlam has engaged the Deloitte team to offer its specialist, Conduct Watch service and to perform the role of Eligible Recipient.

This service is staffed 24 hours a day, everyday and accessible from anywhere across the world.

There are three alternatives for making a disclosure through Conduct Watch.

Telephone *	1800 293 032
<p>This is a free call telephone line for whistleblowers based in Australia. It is answered in English by Deloitte teams and available 24 hours a day, 7 days a week.</p> <p>Whistleblowers will be asked to nominate if they prefer to remain anonymous.</p> <p><i>*National Relay Service available: Whistleblowers who are deaf or hearing impaired are invited to contact the National Relay Service for support in making a disclosure to Conduct Watch via telephone. The National Relay Service is available at www.accesshub.gov.au</i></p>	
Online	www.schlamconductwatch.deloitte.com.au
<p>This secure web-based platform is available in three languages: English, Mandarin and Spanish. It is intended to be easily accessible for whistleblowers in Australia and internationally. Other languages may be added to this service over time.</p> <p>Whistleblowers will be asked to nominate if they prefer to remain anonymous or for their preferred contact details.</p> <p>The Deloitte Conduct Watch platform is also the main way for whistleblowers to communicate confidentially with the Deloitte team and the Company's Eligible Recipients as the disclosed matter is investigated, even if they have elected to remain anonymous.</p>	
Post	Schlam Conduct Watch Reply Paid 12628 A'Beckett Street Melbourne Vic 8006
<p>The Deloitte team receives reports sent by mail. If the whistleblower has provided contact details, then a Deloitte team member will contact them to ask if they would prefer to remain anonymous and will then commence the Initial Review process.</p>	

5.0 ANONYMITY

Irrespective of the internal or external methods used, disclosures can be made on an anonymous basis and still be protected under the Corporations Act. The whistleblower can decide whether to remain anonymous while making a disclosure, over the course of any investigation and after any investigation is finalised.

It is recommended that whistleblowers who wish to remain anonymous utilise the online Deloitte Conduct Watch platform. This allows for two-way communication with both Deloitte representatives and the Company while maintaining anonymity.

For more information about the reporting channels and whistleblower process prior to making a disclosure, contact the Whistleblower Protection Officer: Danielle Lazarov, Chief Human Resources Officer, (Danielle.lazarov@schlam.com).

6.0 INVESTIGATIONS

The process for investigating a disclosure is as follows (see appendix A for flowchart).

1. **Disclosure** – Disclosures are made through one of the four reporting channels available.
2. **Initial review** - The Eligible Recipients review the disclosure to ensure it is eligible under the Policy. If further information is needed, initial contact may be made with the whistleblower directly, depending on the whistleblower's expressed preferences for anonymity and contacts.

If the disclosure is related to a personal work-related grievance, it will be addressed under the Company's Dispute & Grievance Resolution procedure.

If the disclosure relates to an executive of the company, then this will be escalated to a Board designated Eligible Recipient.

3. **Initial report** – An initial report on the disclosure is prepared which identifies the issues and facilitates the development of an investigation plan. In the case of disclosures received by Deloitte, this initial report is directed to one of the Company's Eligible Recipients. The Recipient will be independent of both the whistleblower and the subject of the disclosure matter.

The internal Eligible Recipients will assess if an investigation is required. If it is deemed that an investigation is not necessary, then the whistleblower will be informed of this outcome.

4. **Investigation** – Where it is necessary, the Eligible Recipient will coordinate a confidential, fair, thorough and objective investigation into the matter reported. This will seek to verify the reported information and could include providing a fair opportunity for anyone named in the disclosure to respond to allegations made. If appropriate depending on the nature of the issue, an external specialist service may also be engaged to support the investigation on a strictly confidential basis.

Whistleblowers will be kept informed and updated about the investigation. This will as a minimum, acknowledge the investigation has begun, include an update while the investigation is in progress and provide a further update when the investigation has been completed.

5. **Outcomes reporting** – The outcome of the investigation and any recommendations arising from the findings will be documented and shared with the whistleblower, Chief Human Resources Officer and Executive Chair and Chief Executive Officer.
6. **Actions arising** – Any actions recommended and accepted from the investigation report will then be undertaken. This may include rectification, disciplinary or preventative actions.
7. **Documentation** – All records of the disclosure, investigation and outcomes will be kept securely to maintain the confidentiality of all parties involved.

Engagement with the whistleblower throughout this process will be case managed through the Deloitte Conduct Watch platform using a unique identification number.

The Company aims to complete the process between the receipt of a disclosure to the conclusion of the investigation within 60 days.

If the whistleblower is dissatisfied with the outcome or process, they may lodge a complaint with the Whistleblower Protection Officer (Danielle Lazarov, Chief Human Resources Officer) or through Conduct Watch.

7.0 CONFIDENTIALITY

A whistleblower's identity and any information that can lead to their identification will be kept confidential unless the disclosure is made:

- with the whistleblower's consent
- to the regulators (ASIC or ATO) or a member of the jurisdictional police force
- to a lawyer for the purpose of obtaining legal advice or representation in relation to the legislative whistleblower regimes.

In addition, a whistleblower can refuse to answer an identity-revealing questions and can use pseudonyms or anonymous channels while making a disclosure.

The Company will take reasonable steps to maintain the confidentiality of whistleblowers and reduce the risk of disclosing confidential information by:

- securing record-keeping and information-sharing processes:
 - ensuring files on disclosures, investigations and reports are securely kept and accessed only by authorised and qualified team members directly involved in managing the case
 - restricting the number of people who are directly involved in handling the investigation
 - controlling email and printer use
 - reminding all those involved of their confidentiality obligations
- ensuring all identifying references to a whistleblower (such as gender, position, colleague names etc.) are genericised/ redacted
- referring to the whistleblower in a gender-neutral context
- where possible, identifying with the whistleblower any aspects of the report that could inadvertently identify them.

A breach of the confidentiality requirements is a breach of legislation. Whistleblowers can lodge a complaint with the Company about breaches of confidentiality by contacting Whistleblower Protection Officer (Danielle Lazarov, Chief Human Resources Officer) or the regulators (ASIC and ATO) for investigation.

8.0 REFERENCES

Location: SharePoint Schlam Document Library

Document	Title
SCH-COR-POL-014	Whistleblower Policy
SCH-HR-POL-009	Code of Conduct
SCH-GRP-POL-008	Business Ethics
SCH-HR-PRO-002	Dispute & Grievance Resolution
SCH-HR-POL-002	Respectful Workplace
SCH-GRP-POL-010	Anti-Bribery and Corruption Policy
SCH-HR-POL-003	Human Rights and Modern Slavery
SCH-GRP-POL-006	Diversity and Inclusion Policy



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9.0 RECORDS

Reference No	Document Title	Location
N/A	N/A	N/A

10.0 APPENDICES

Appendix	Description	Reference No
'A'	Whistleblower Procedure Flowchart	N/A

Appendix 'A' – Whistleblower Procedure Flowchart

