

BMT Global “Raising Concerns” Policy

October 2018

1. OVERVIEW

BMT is committed to creating and maintaining a working environment which exemplifies integrity and accountability and adopts systems that support transparency in decision-making, good governance and ethical behaviour.

This Policy supports the disclosure by individuals of wrongdoing occurring within BMT so that appropriate action can be taken. BMT will treat all information disclosed in a confidential manner (so far as circumstances permit), conduct a fair and objective investigation and take appropriate remedial steps or notify relevant authorities.

The purpose of this Policy is to ensure that BMT:

- Encourages and facilitates the disclosure by individuals of wrongdoing without fear of reprisal;
- Provides appropriate protection for those who make disclosures under this Policy and in accordance with any local legislation in the jurisdictions in which we operate;
- Properly fulfils its responsibilities within any local legislation in the jurisdictions in which we operate (for example, the Australian Standard, Whistleblower Protection Program for Entities, AS8004-2003.)

The benefits of encouraging disclosures of wrongdoing and protecting those who make disclosures include:

- Effective compliance with BMT’s legal and regulatory obligations;
- Effective compliance with other BMT policies and governance requirements;
- Promotion of a culture of integrity and accountability;
- Improve morale within the BMT community; and
- A healthier and safer working environment.

2. SCOPE AND APPLICATION

All BMT stakeholders are encouraged to report any wrongdoing in accordance with this Policy. This Policy operates in conjunction with and does not take away the protection which exists under law.

3. POLICY PRINCIPLES

Matters which should be reported under this Policy may include, but are not limited to:

- Dishonest, fraudulent, corrupt or unlawful conduct or practices. This includes but is not limited to accounting and financial reporting practices, as well as those related to commercial and contractual arrangements with other parties.
- A breach of BMT's ethical code, policies, procedures or the applicable legal obligations.
- Conduct that may cause financial or non-financial loss to BMT or damage the company's reputation.
- Conduct endangering the environment, community, or the health and safety of any person which has been reported to management but not acted upon.

4. HOW TO RAISE A CONCERN

A member of staff or immediate family member may make a disclosure to:

- A director, Company Secretary or senior manager of the Operating Unit;
- The Centre HR Director, General Counsel or Head of Risk and Internal Audit; or
- The Partnership MD.

The preferred route is via the ExpoLink Hotline – details below.

A stakeholder who is not a member of staff may make a disclosure to:

- Any member of the BMT Executive Committee;
- Head of Stakeholder Engagement
- Head of Risk and Internal Audit;
- Head of Commercial.

BMT has implemented a hotline (provided by ExpoLink) so that concerns can be raised confidentially and, if preferred, anonymously.

The hotline contact details are displayed on posters and cards within each operating unit and all employees should familiarize themselves with the details. When a concern is raised through the hotline, the details are passed to Centre HR Director, General Counsel and Head of Risk and Internal Audit, who will then allocate the investigation to a single individual to manage.

Concerns raised directly to a director, Company Secretary, senior manager of the Operating Unit or Partnership MD should be elevated to the Centre HR Director, General Counsel or Head of Risk and Internal Audit as appropriate.

5. INVESTIGATION OF DISCLOSURES

- All disclosures of wrongdoing will be the subject of an investigation by the Centre HR Director, General Counsel or Head of Risk and Internal Audit as appropriate;
- Investigations will be conducted promptly and on a fair and impartial basis, separately from the person raising the concern or the person/part of BMT which is the subject of the disclosure;
- Principles of natural justice will apply to the investigation so that the investigation is conducted without bias and the matters which are subject of the investigation are made known to the person (or persons) who is the subject of disclosure and that the person is given an adequate opportunity to respond to those matters;
- The investigation will be conducted in the most appropriate manner to deal with the matters which are the subject of a disclosure and, where required, the investigator may seek the assistance of other individuals within or external to BMT with relevant expertise and make disclosures of information to those individuals on a confidential basis strictly for that purpose;
- The person raising the concern will be informed of the progress and outcome of the investigation;
- A record of steps taken in the conduct of an investigation will be maintained including all enquiries made and critical decisions taken, to allow the review of the effectiveness of the procedures employed throughout the investigation.

6. INVESTIGATION REPORTS

- Following the investigation, the investigator or authorised delegate will report the findings to the Chief Executive who will determine the appropriate response in consultation with the Ethics Committee;
- If the Chief Executive is subject to any allegations, the Chairman of the Board will determine the appropriate response;
- The response will include addressing any unacceptable conduct and taking corrective action to minimize the risk of similar occurrences in the future;
- A summary of investigation outcomes will be reported to the Audit Committee.

7. CONFIDENTIALITY

As far as possible, and subject to the need to conduct proper investigations and take any consequential disciplinary steps, BMT is committed to preserving the confidentiality of:

- The identity of the person raising the concerns;
- The identity of the person(s) who is/are the subject of the disclosure; and
- The fact the disclosure has been made.

Information must remain confidential where reasonably possible.

8. PROTECTION OF THOSE RAISING CONCERNS

- A person raising genuine concerns, in good faith, is entitled to protection under this Policy and must not be subject to adverse consequences;
- Complaints about a breach of confidentiality relating to someone disclosing or attempting to disclose wrongdoing should be directed to the Centre HR Director;
- Such complaints will be investigated as a separate matter by a senior manager, who is not involved in dealing with the initial disclosure. The results will be provided to the relevant Partnership MD;
- If a breach of confidentiality or victimisation is established the Centre HR Director will take immediate steps to stop the activity and protect the person. This may include disciplinary action up to and including dismissal against those who are found to have breached confidentiality or played a part in the victimization;

9. DELIBERATE AND FALSE DISCLOSURES

A person who knowingly makes a deliberate and false accusation

- May have engaged in misconduct and be subject to disciplinary action; and
- May be guilty of an offence under local laws

10. ROLE OF THE GLOBAL ETHICS COMMITTEE

The ethics committee meets every six months and will review, giving due regard to confidentiality:

- The types of incident which have been reported;
- Corrective action taken to address issues; and
- The effectiveness of the investigation process.

11. DOCUMENT MANAGEMENT

All information, documents, records and reports relating to the investigation of reported misconduct will be confidentially stored and retained in a secure manner.

The policy will be reviewed annually by the Global Ethics Committee for continuing suitability.