



**GLOBE INTERNATIONAL LIMITED (“GLOBE”)  
WHISTLEBLOWER PROTECTION POLICY**

**Purpose of this policy**

Globe International Limited and its fully controlled entities (“Globe”) has over the years been committed to promoting a culture of ethical behavior and good corporate governance, including the encouragement of employees to report unethical, unlawful and undesirable conduct without fear of retaliatory action. This commitment has been enshrined in Globe’s Corporate Code of Conduct for many years.

Globe also recognises its compliance obligations to provide an effective whistleblower protection program in accordance with the *Corporations Act 2001* (as amended by the *Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019*).

In support of our commitment to protect our people who wish to come forward with a report of unethical, unlawful and undesirable conduct, Globe has implemented this Whistleblower Protection Policy to facilitate the reporting by employees and contractors and certain external parties of unethical, unacceptable, unlawful or inappropriate behavior without fear of retaliation or reprisal.

**Who this policy applies to**

All Globe employees and contractors have a responsibility to help detect, prevent and report any instances of suspicious activity or wrong-doing. Any such incident is referred to as a “Disclosable Matter”, the nature of which is defined in Section 3 of this policy. This Policy also applies to all external eligible whistleblowers as identified by the *Corporations Act 2001*, and defined in Section 13 of this Policy.

All disclosers are encouraged to raise concerns about any issue or suspicion of a reportable matter at the earliest possible stage as set out in Section 5 of this Policy.

**What is a Disclosable Matter?**

A Disclosable Matter is any concern about the following conduct, or the deliberate concealment of such conduct:

- Theft.
- Fraud.
- Financial irregularity (including a fraud against Globe or a customer).
- Corrupt conduct.
- Criminal conduct.
- Failure to comply with any legal or regulatory obligation.
- Unfair or unethical dealing with a customer, supplier or contractor.
- Unethical or other serious improper conduct, including breaches of Globe policies.
- Bullying.
- Harassment.
- Discrimination (sex, age, gender, religion, race, etc.).

- Workplace safety concerns.
- Danger to the public
- Offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more

Reporting any of the above conduct under this policy can include the conduct of any director, employee, contractor or third party, whether actual or suspected.

It is to be noted personal grievances are not a Disclosable Matter. Personal grievances include interpersonal conflicts, matters relating to promotions or transfers, personality clashes. Such matters should be reported through the appropriate people management channels in each of Globe's locations.

### **Who can receive a disclosure**

The following people can receive a disclosure that qualifies for protection under this policy:

- Persons within Globe listed below, in order of priority:
  1. The employee's immediate manager
  2. A President or Vice President
  3. The Chief Financial Officer (CFO), Company Secretary or General Counsel
  4. The Chief Executive Officer (CEO)
  5. The Chairman of Globe's Board
- A legal practitioner outside of Globe
- Regulatory bodies such as ASIC, APRA or ATO
- Globe's external auditors

In some instances a Disclosable Matter may also be reported to a member of parliament or a journalist. However, such disclosures will be protected only if they have already been made to ASIC, APRA (or another prescribed body) and where the discloser believes there is a substantial or imminent risk to public health and safety (or the environment). A public interest disclosure may be made in circumstances where 90 days have passed since the whistleblower's original disclosure to one of the prescribed regulators and they believe, on reasonable grounds, that further disclosure would be in the public interest. The discloser must give the original recipient written notice of their intention to make an emergency or public interest disclosure. Disclosures will not be protected as public interest disclosures or emergency disclosures if they relate to tax affairs.

### **How to make a disclosure**

In the first instance employees are strongly encouraged to report a Disclosable Matter to their immediate manager. However if an employee does not feel comfortable doing so he should contact the other persons within Globe listed above, before contacting anyone outside of Globe.

Employees may at any stage skip a person in the chain outlined above if that person is the subject of the report or if they have another reason to believe that the person is not likely to deal with the report properly.

External eligible whistle blowers should report a Disclosable Matter directly to the Whistleblower Protection Officers ("WPOs") who are the Company Secretary by email [jessica.m@globebrand.com](mailto:jessica.m@globebrand.com) or by phone on (03) 8534 9932 or if the Disclosable Matter relates to the USA division by email to the General Counsel by email to [audrey.lee-iike@globebrand.com](mailto:audrey.lee-iike@globebrand.com) or by phone on (1) – 310 297 1613.

Disclosures can be made anonymously, if desired. However, this may affect Globe's ability to investigate the matter properly and to communicate with the discloser about the disclosure. Anonymous disclosures should be mailed to the Whistleblower Protection Officer c/o Globe International Limited, 1 Fennell Street, Port Melbourne, Vic 3207, Australia. USA related disclosures should be mailed to the Whistleblower Protection Officer c/o Osata Enterprises Inc, 18105 Bishop Avenue, Carson, California 90746, USA. Disclosures can also be made by using pseudonym email accounts and emailed to [jessica.m@globebrand.com](mailto:jessica.m@globebrand.com) and in the case of USA related disclosures to [audrey.lee-jike@globebrand.com](mailto:audrey.lee-jike@globebrand.com)

Nothing in this Policy should be taken as restricting the discloser from disclosing any matter or providing any information to a regulator (such as ASIC, APRA or the ATO), Globe's auditor or a member of the audit team or any other person in accordance with any relevant law, regulation or other requirement.

### **Legal protections for disclosers**

The aim of this Policy is to ensure disclosers are confident about raising concerns internally, by offering a reporting and investigative mechanism that is objective, confidential and independent and protects them from reprisal or disadvantage.

Under this Policy:

- Disclosers are encouraged to report concerns, whether openly or, if desired, anonymously.
- If a discloser reports their concerns, they will be afforded confidentiality unless they indicate (or the law requires) otherwise.
- Concerns reported by disclosers will be properly investigated with a view to establishing the facts and correcting any wrongdoing where possible.
- Where disclosers identify themselves, they will be advised of the outcome of the investigation and any action taken, as much as practicable.

Disclosers will not be victimised or adversely affected because of their action in reporting their concerns (provided there is a basis for their concerns and that they have acted on reasonable grounds). Globe is committed to ensuring that all disclosers have a safe, reliable and confidential way of reporting any Disclosable Matters.

### **Action Required When Your Disclosure is Made**

The person to whom an employee makes a disclosure under this Policy must report the matter to the Whistleblower Protection Officer as soon as possible. External eligible whistleblowers must make their disclosures directly to the Whistleblower Protection Officer.

The Whistleblower Protection Officer will then:

- nominate a Whistleblowing Investigations Officer who will ensure the matter is thoroughly investigated, as per the investigation process guidelines outlined in Section 8 of this policy.
- Give the Chairman of the Board particulars of the report that has been made at the conclusion of the investigation process, or earlier if the Whistleblower Protection Officers considers early reporting to be a necessity. This will depend on the circumstances and severity of the matter reported.

### **Investigation Process**

The investigation process will vary depending on the precise nature of the conduct being investigated. The purpose of the investigation is to determine whether the discloser's concerns

are substantiated, with a view to Globe then rectifying any wrongdoing uncovered to the extent that this is practicable in all the circumstances. If the discloser is not anonymous, the findings of the investigation will be communicated to the discloser.

The investigation will be thorough, objective, fair and independent of the discloser, and anyone who is the subject of the Disclosable Matter.

The Investigating Officer will prepare a report at the conclusion of the investigation that outlines:

- Details of the disclosable matter (how report was made, date, person (if applicable))
- Investigation Officer nominated
- Details of how the investigation was carried out
- Findings from the investigation
- Action taken as a result of the investigation (if applicable. Can include action taken against person involved, changes in policy required etc).

### **Confidentiality**

The person to whom an employee makes a report under this Policy may disclose the employee's identity to the Whistleblower Protection Officer but will otherwise keep the employee's identity confidential.

The Whistleblower Protection Officer will ensure that all files relating to the disclosers report are kept secure and that information received from the discloser is held in confidence and is only disclosed to a person not connected with the investigation if:

- The discloser has been consulted and have consented to the disclosure; or
- It is required or permissible by law.

It is possible that someone might deduce the discloser's identity without there having been a breach of confidentiality, if the nature of the disclosers report points to one particular individual having made it or otherwise as a consequence of the nature of the investigatory process.

Globe recognises that "whistleblowing" can be very stressful and difficult. Provided that the discloser has acted in good faith and that they have not themselves engaged in serious misconduct or illegal conduct, to the maximum extent possible they will not be subject to disciplinary sanctions or any legal action by Globe in relation to any matters that they report.

The Whistleblower Protection Officer will safeguard the discloser's interests, having regard to this Policy and any other applicable policies and laws.

In particular, the Whistleblower Protection Officer will take whatever action is possible consistent with this Policy to make sure disclosers are not personally disadvantaged for making the report, whether by dismissal, demotion, any form of harassment, discrimination or any form of current or future bias.

If the discloser claims to have been the subject of any such action as a consequence of making the report, and the matter cannot be resolved by management, the matter will be referred to the Chair of Globe's Board.

Any person found in breach of the provisions in this policy will be subject to disciplinary procedures, including dismissal or where applicable legal action.

### **False Reporting**

A false report of a Disclosable Matter could have significant effects on Globe's reputation and the reputations of other employees and could also cause considerable waste of time and effort.

Any deliberately false reporting of a Disclosable Matter, whether under this Policy or otherwise,

will be treated as a serious disciplinary matter.

## **Records**

The Whistleblower Protection Officer will maintain a record of all whistleblowing incidents and actions taken under this Policy so that the Policy can be periodically reviewed.

## **Questions**

Any questions about this Policy should be directed to the Company Secretary.

## **Definitions**

**Discloser:** Employees and all eligible external whistleblowers as identified by the legislation.

**Eligible external whistleblowers:** This includes former directors and employees, and their relatives and dependents and employees of suppliers as well as their relatives and dependents.

**Employee:** Globe's directors, officers, senior management, managers and all other employees (including contractors and casual employees) worldwide.

**Whistleblowing Investigations Officer (WIO):** This will generally be a member of the senior management team, as determined by the Whistle Blower Protections Officer (in consultation with the Chairman of the Board, as required). The nominated person will depend on the nature of the Disclosable Matter, but may be the Chief Financial Officer, a President, a Vice-President or some other independent and suitably qualified person nominated by the Chairman of the Board from time to time.

**Whistleblower Protection Officer (WPO):** Company Secretary and in the case of the USA division, the General Counsel.

## **Related Policies**

This Policy must be read in conjunction with the following policies:

- Employment Policies Handbook
- Corporate Code of Conduct
- OH&S Manual

## **Policy evaluation and review**

Globe's senior management are the owners of this policy and are responsible for the implementation, interpretation, application, review and revisions.

## **Policy dissemination**

This policy is referenced in the Employee Handbook, and is available for viewing by all disclosers on Globe corporate website [www.globecorporate.com](http://www.globecorporate.com)