Lindfield Bowling & Bridge Club

Serving the Community Since 1952

WHISTLEBLOWER POLICY

Version Control

Date	Version	Author	Details
Mar 2026	Draft	Sharon Thompson	Initial policy adoption
15th July ‘26	v1.0	Sharon Thompson	After Board review and comments

Board Approval Date: 15th July 2026

Policy Owner: Board of Directors / Whistleblower Officer (Chairman)

WHISTLEBLOWER POLICY

Lindfield Bowling & Bridge Club

A Registered Club under the Registered Clubs Act 1976 (NSW)

> **Important Notice**
> This Policy is required by law under the Corporations Act 2001 (Cth) as amended by the Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019. Directors of the Club are "Eligible Recipients" under this legislation. Failure to comply with this Policy — including any breach of confidentiality or victimisation of a whistleblower — may result in significant civil and criminal penalties.

1. Purpose

This Policy explains how Lindfield Bowling & Bridge Club (the Club) encourages and protects people who report, in good faith, conduct that is dishonest, illegal, or improper. The Club is committed to the highest standards of ethical conduct, and we recognise that the willingness of individuals to speak up is essential to maintaining that standard.

This Policy is designed to:

- Encourage the reporting of genuine concerns about misconduct without fear of reprisal;
- Establish a clear and safe process for making a disclosure;
- Ensure that disclosures are handled confidentially and taken seriously;
- Protect those who make disclosures from detrimental treatment; and
- Comply with the whistleblower protection provisions of the Corporations Act 2001 (Cth).

2. Scope

This Policy applies to all persons who are eligible whistleblowers under the Corporations Act 2001. An eligible whistleblower is:

- A current or former employee of the Club;
- A current or former officer or Director of the Club;
- A current or former contractor, supplier or service provider (including their employees);
- An associate of the Club; or
- A relative, dependant or spouse of any of the above.

3. What Can Be Reported

Under this Policy, a person may report information that they have reasonable grounds to suspect concerns misconduct or an improper state of affairs in relation to the Club, including:

- Dishonest or fraudulent conduct, including misappropriation of funds or falsification of records;
- Bribery, corruption or conflicts of interest;

- Breach of the Corporations Act 2001, the Registered Clubs Act 1976 (NSW), or other applicable legislation;
- Serious breaches of the Club's Constitution, policies or Code of Conduct;
- Conduct that represents a danger to the health or safety of any person;
- Conduct that is oppressive, dishonest or involves gross mismanagement;
- Conduct that may constitute an offence against any law of the Commonwealth or NSW; or
- Any other conduct that the person reasonably believes should be investigated.

This Policy does not cover personal work related grievances (such as a dispute about a performance review or interpersonal conflict), which are covered by the Club's Grievance Handling Procedure

4. Who to Report To (Eligible Recipients)

A disclosure can be made to any of the following Eligible Recipients:

Recipient	Contact	When to Use
Whistleblower Officer (Club Chairman)	Via club email or post marked Confidential	First point of contact in most cases
Any other Director	Via club email or post marked Confidential	Where disclosure concerns the Chairman
Club's External Auditor or Legal Adviser	Direct contact — details available from Chairman or Treasurer	Where internal disclosure is not appropriate
ASIC or other Regulator	asic.gov.au or 1300 300 630	Serious matters or where internal process has failed

Anonymous disclosures are permitted and will be accepted and investigated to the extent practicable. However, the ability of the Club to investigate and protect an anonymous discloser may be limited. The Club encourages persons to identify themselves to enable effective follow-up.

5. Protections for Whistleblowers

5.1 Immunity from Civil and Criminal Liability

A person who makes a protected disclosure is immune from any civil, criminal or administrative liability (including disciplinary action) for making the disclosure. No contractual or other remedy may be enforced against the person for making a protected disclosure.

5.2 Confidentiality

The Club is legally required to protect the identity of a whistleblower. This means:

- The identity of the whistleblower will not be disclosed without their consent, except where required by law or where the disclosure is made to ASIC, a legal adviser or the police.
- Information that is likely to lead to the identification of the whistleblower will not be disclosed without consent.

- All persons involved in handling a disclosure must take active steps to protect the identity of the whistleblower throughout any investigation.

> **Penalty Warning**
> Under the Corporations Act 2001, an unauthorised disclosure of a whistleblower's identity or information that identifies them is a criminal offence. Individuals may face penalties of up to $1,050,000. The Club may face penalties of up to $10,500,000.

5.3 Protection from Victimisation

The Club strictly prohibits any victimisation of a person who has made, or is suspected of making, a disclosure under this Policy. Victimisation includes any conduct that causes detriment to a person, including:

- Dismissal, demotion, suspension or disciplinary action;
- Harassment, bullying or intimidation;
- Discrimination or disadvantage in their role;
- Threats of any of the above; or
- Any other adverse treatment connected to the disclosure.

Victimisation of a whistleblower is a criminal offence under the Corporations Act 2001 and will result in serious disciplinary action, up to and including removal from the Board or termination of employment.

Any person who believes they have been victimised as a result of making a disclosure should contact the Club Chairman, another Director, or ASIC immediately.

6. Handling a Disclosure — Process

6.1 Receipt of a Disclosure

When an Eligible Recipient receives a disclosure:

- They must acknowledge receipt within a reasonable time (generally within 5 business days).
- They must inform the whistleblower of how the matter will be handled.
- They must refer the disclosure to the Whistleblower Officer (or, if the disclosure concerns the Whistleblower Officer, to the full Board) promptly.
- They must not discuss the disclosure with any person not involved in the investigation.

6.2 Investigation

The Whistleblower Officer (or their delegate, being another Director if the disclosure concerns the Chairman) will:

- Assess whether the disclosure falls within the scope of this Policy.
- Determine whether an investigation is warranted and the appropriate form of investigation.
- Conduct or oversee the investigation with appropriate confidentiality.
- Where appropriate, engage an independent external investigator.

- Keep the whistleblower reasonably informed of the progress and outcome of the investigation, to the extent permitted by law and confidentiality obligations.

6.3 Outcome

On completion of the investigation, a report will be provided to the Board. The Board will determine the appropriate response and action. Investigation outcomes will not necessarily be disclosed to the whistleblower, particularly if doing so would breach confidentiality obligations to others.

7. False or Vexatious Reports

This Policy is not intended to protect persons who make disclosures they know to be false or who make disclosures for malicious or vexatious purposes. A person who knowingly makes a false disclosure, or who makes a disclosure in bad faith, may face disciplinary action. The protections in this Policy do not apply to such disclosures.

However, the fact that a concern is raised in good faith but is not ultimately substantiated does not mean the disclosure was false or vexatious — the protection remains.

8. Responsibilities

The Whistleblower Officer (Club Chairman, or the Club Secretary where the disclosure concerns the Chairman) is responsible for:

- Being the primary point of contact for disclosures under this Policy;
- Ensuring that all Eligible Recipients are trained on their obligations under this Policy;
- Overseeing all investigations conducted under this Policy;
- Maintaining a confidential record of all disclosures and their outcomes;
- Reporting to the full Board on the operation of this Policy at least annually; and
- Ensuring this Policy is reviewed and kept current.

All Directors are responsible for understanding their status as Eligible Recipients and their obligations under this Policy. All staff are responsible for complying with this Policy and supporting an environment where genuine concerns can be raised safely.

9. Policy Review

This Policy will be reviewed by the Board at least annually or following any change in applicable legislation. The Corporations Act 2001 requirements in this area are subject to change, and the Club is committed to maintaining a compliant and effective whistleblower framework.

Board Approval

This Policy was adopted by the Board of Directors of Lindfield Bowling & Bridge Club Incorporated at a duly convened Board meeting.

Date of Adoption: 15th July 2026

Signed (Deputy Chairman): ________________________