

Speak Up Policy

1. HAVING A SPEAK UP POLICY IS IMPORTANT

1.1 Reason

A 'Speak Up' policy creates a pathway and encourages the freedom to raise concerns. We want all GOgetters to be confident that they will be supported to 'do the right thing'.

This policy explains **how you can raise concerns about suspected misconduct in confidence without fear of retaliation**. It also describes what process you can expect if you Speak Up. At BINGO we believe 'Speak Up' is a core component of a supportive, ethical business culture.

1.2 Application

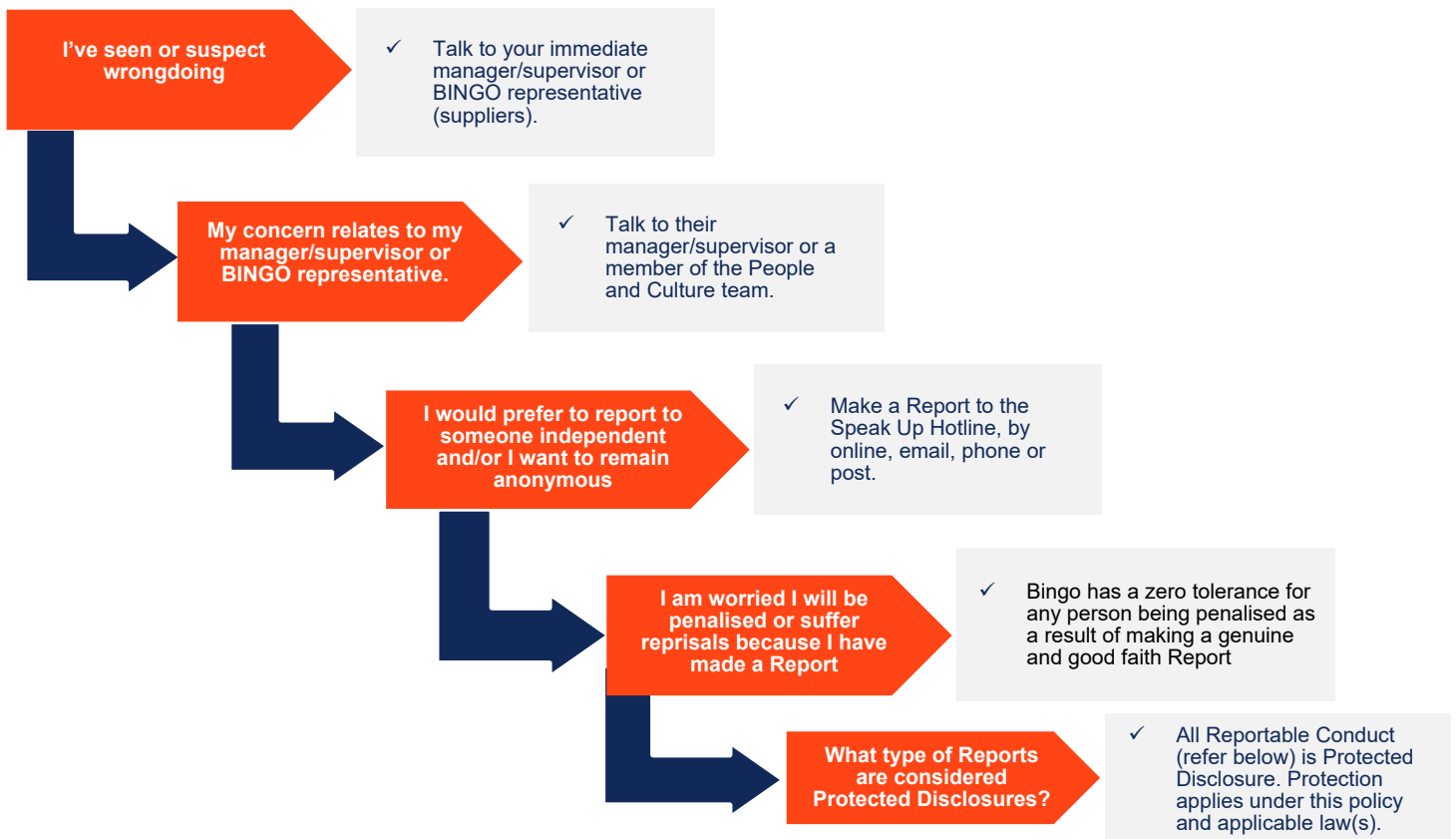
BINGO recognises the importance of ensuring a safe, supportive and confidential environment where people feel confident to 'speak up' about wrongdoing and feel supported throughout the process. This Policy establishes the minimum requirements for how BINGO will foster and encourage a safe and confidential culture of speaking up whilst ensuring there are protections and protocols in place to support those who elect to seek protection as a result of speaking up under this policy.

This policy should be reviewed in context of our Discrimination, Bullying & Harassment Policy, Diversity Policy, Diversity, Equity, Inclusion and Belonging (DEIB) Framework and our Grievance Policy.

This Policy applies to work and work-related activities both at and away from BINGO premises.

It also applies to interactions that GOgetters have with customers and the communities in which we operate, including our dealings with any other person or company on behalf of BINGO. These interactions may be face to face, or via technology.

2. RAISING A CONCERN



3. WHAT CAN I RAISE A CONCERN ABOUT? - 'REPORTABLE CONDUCT'

GOgetters who suspect any wrongdoing or any other issue that may be threatening their safety or wellbeing at work, or that may be negatively impacting BINGO, its employees, customers or suppliers are encouraged to raise the issue as soon as possible.

Reportable Conduct is any conduct (e.g. issue or wrongdoing) which could be considered to be:

- Illegal conduct, such as theft, dealing in or use of illicit drugs, violence or threatened violence, and criminal damage against property;
- Fraud, money laundering or misappropriation of funds;
- Offering or accepting bribery;
- Financial irregularities;
- Failure to comply with, or breach of, legal or regulatory requirements;
- An activity that endangers health, safety or the environment;
- Engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made, or be planning to make, a disclosure; and/or
- An offence against, or a contravention of, a provision of certain legislation (See Key Terms 'Reportable Conduct' below)

4. HOW DO I SPEAK UP?

Where practicable, you are encouraged to approach your immediate manager/supervisor in the first instance or BINGO representative (in the case of Suppliers) as this provides a logical option to discuss your concerns and for BINGO to take management action where appropriate.

Alternatively, if the concern involves your immediate manager/supervisor (or primary point of contact), you are encouraged to raise your concerns to either the manager/supervisor one level above or the People and Culture team.

If you choose to raise a concern, but feel that it is not appropriate to raise the issue to:

- your immediate manager/supervisor (or primary point of contact);
- the manager/supervisor one level above or the People and Culture team; or
- you have concerns for your wellbeing or fears of reprisal as a result of raising a concern,

you may make a Report through to an Eligible Recipient (see Key Terms below), including BINGO's 'Speak Up' Hotline.

If the nature of your concern relates solely to a grievance or performance issue, you are encouraged to follow BINGO's formal complaint management/grievance procedure, provided in BINGO's Grievance Policy, a copy of which can be found at: <https://www.BINGOindustries.com.au/sustainability/governance>

BINGO's Speak Up Hotline is an externally managed and independent hotline service provided by our integrity partners, Core Integrity Pty Ltd ("Core Integrity").

Core Integrity are experienced in the management of Speak Up reports and treat all matters in the strictest of confidence and adhere to the procedures outlined in this Policy.

Of the list of Eligible Recipients, we encourage you to utilise the Speak Up Hotline in the first instance to ensure your Report is received and actioned in a timely manner and to ensure you receive a consistent experience.

The channels through which you can make a Report to BINGO's Speak Up Hotline include:

Speak Up Hotline Channel	Details
Web & Online (URL)	Qrs.ly/BingoSpeakUp
Web & Online (QR Code)	
Email	speakup@coreintegrity.com.au
Phone	1800 324 775
Mail	Speak Up P.O. Box 895 Darlinghurst NSW 1300

5. MAKING A REPORT

5.1 What is a 'Report'?

A **Report** is a disclosure made by any GOgetter (Employee) or Supplier, whether protected or not, through one of the Speak Up Reporting Channels set out in this Policy. A Report can be general in nature or can be a Protected Disclosure (refer below).

5.2 What happens when I make a Report?

When making a Report under this Policy, you will be requested to provide as much information as possible about the issue being raised. Information such as dates, times, location, individuals involved, other witnesses, physical evidence (e.g. documents, images) and any other general information may be sought.

This information is important as it enables BINGO to properly assess the concerns being raised and decide on the appropriate course of action to be taken.

Any information provided in a Report (including the Reporter's details) may be used by BINGO in consideration of an investigation or some other action. except in certain circumstances such as a whistleblower report (Protected Disclosure) where the person speaking up (i.e. a Whistleblower) has not specifically consented to providing the Reporter's details, or information that may lead to the Reporter's information being known, by a third party.

5.3 How is my Report protected?

If you make any Report under this Policy, you will have your details, and the information you provide, treated in the strictest of confidence. IA Report may be considered a Protected Disclosure under the Whistleblower Protection Scheme, where you have reasonable grounds to believe the Report and information supplied is true, are deemed an eligible Whistleblower and have made your Report to an Eligible Recipient or regulator.

BINGO is committed to ensuring that a person who makes a Report is provided support and protection from personal or financial disadvantage as a result of making a Report in good faith. BINGO will not tolerate any form of retaliation against Employees or Suppliers who make a Report in good faith under this Policy.

If you are entitled to Whistleblower protection, and believe you have been subjected to any form of reprisal or adverse action as a result of making a Report, you should notify BINGO's Whistleblower Protection Officer (**WPO**) (refer below).

5.4 Can I remain anonymous?

You can choose to remain anonymous when making a Report.

When making a Report, your identity, any information you provide in your Report which may lead to your identity, will not be disclosed unless you consent to the disclosure of that information or if BINGO has been compelled or permitted by law, regulatory obligations or broader external requirements to disclose the information.

It is important to remember that anonymous Reports can, at times, be more difficult to investigate and if you choose to remain completely anonymous and do not provide any contact information, the WPO and/or Whistleblower Investigations Officer (**WIO**) may be unable to make contact with you to ask further questions about your Report or provide you with any updates on the investigation or provide you with feedback on the Report.

Should you wish to remain anonymous, you are encouraged to submit your Report via Core Integrity's online and secure reporting channel (web link and/or QR code) referred to in [How do I 'Speak Up'?](#) above.

If you submit a Report via our secure online reporting channel, and elect to remain anonymous, you can still receive updates on your Report, communicate with those who may be reviewing or investigating your issue, provide more information and check on the status of your Report by submitting a Report via the online reporting platform.

To ensure you are notified of any changes to your Report, including new comments from those reviewing or investigating your issue, you are encouraged to provide your email address within the secure platform. Your email address will not be visible or accessible to anyone from BINGO or the independent third party, Core Integrity, and it will be deleted from the secure reporting channel at the completion of dealing with your issue.

If you wish to remain anonymous, you should remove all identifying metadata from any supporting documentation that you upload to the platform, this could include names of files, author details and other information.

6. INVESTIGATION

6.1 Stage One

Once a Report has been received and assessed, BINGO will determine the appropriate action required. Examples of actions could include:

- the Report is forwarded for an investigation to take place;
- the Report is recorded for information purposes; or
- no further action is taken.

If a Report you submitted is recommended for information purposes or for no further action, where practicable, you will be contacted and advised of the determination.

6.2 Stage Two

If a Report you submitted is recommended for an investigation to take place, an assessment will be made by the WIO (who may be the General Counsel or Chief People and Culture Officer in certain circumstances), or in the event of a Protected Disclosure, the WPO.

The Report will be assigned to an appropriate investigator either internally or externally for further action. All investigations will be conducted in a manner that is fair, confidential, objective (without bias) and timely.

6.3 Stage Three

At the conclusion of an investigation, you may be informed of the outcome of the investigation by BINGO.

6.4 Relevant Authorities

BINGO may in certain circumstances, whether required by law or if it deems it appropriate, inform the relevant authority of any contents of a Report made.

7. ROLES AND RESPONSIBILITIES

7.1 Whistleblower Protection Officer (WPO)

The WPO is a senior employee appointed by BINGO to, as far as is reasonably practicable, protect persons who seek, or are entitled to, protection when making a Report and is accountable for the provisions of this Policy. The WPO role is performed by BINGO's Internal Audit and Risk Manager. In respect of Protected Disclosures, the WPO will:

- Receive a Protected Disclosure from the Speak Up Hotline, an Employee or Supplier;
- Provide assistance and support to a person speaking up who is seeking protection before, during or after they make a Report (disclosure) in respect of this Policy or are entitled to protection in terms of law;
- Enable the investigation of Reportable Conduct; and
- Maintain the confidentiality, privacy and anonymity (as required) of the person speaking up.

Details of BINGO's WPO are:

Position: Internal Audit and Risk Manager
Email: speakupWPO@BINGOindustries.com.au

7.2 Whistleblower Investigation Officer (WIO)

The WIO is responsible for leading, coordinating or overseeing the investigation of Protected Disclosures made under this Policy.

The WIO can elect to appoint another party, either from within BINGO or external to it, to undertake an investigation on their behalf under this Policy and is to ensure that the investigation is conducted in a fair, confidential, objective (without bias) and timely manner.

Whistleblower (Protected Disclosure) Reports will be assessed by the WIO who will review the Report and decide on the appropriate next steps.

The WIO may be assisted, as required, in determining what the appropriate next steps should be.

Details of BINGO's WIO are:

Position: General Counsel
Email: speakup@BINGOindustries.com.au

7.3 Employee Assistance Program (EAP) - SONDER

When you make a Report under this Policy, the WPO is responsible for overseeing your protection. If you experience any issues as a result making a Report, you should in the first instance contact the WPO.

If you are an GOgetter seeking general welfare support or counselling, you should contact BINGO's Employee Assistance Program (EAP). This is a free and confidential service provided by an independent and external provider, **Sonder**:

1. Download the Sonder app from your preferred app store
2. Enter your email address
3. If asked, enter your registration code BINGO
4. Enter your first and last name
5. Check your inbox to verify your email address and set a password
6. Once completed, you can log in

Scan the QR code and connect with Sonder now

Your family can also access Sonder with registration code: **GOWELL**



8. COMMUNICATIONS WITH THE REPORTER

Where practicable, BINGO will endeavor to keep you informed of the outcomes, if any, of Reports made, subject to the considerations of privacy of those against whom allegations are made and any other factors that may limit the amount of information that can be provided to you.

Formal updates and communications will be entered into Core Integrity's secure, online reporting platform where you are able to receive updates and communicate with BINGO on your Report, should you choose. If you are choosing to make an anonymous Report, and you wish to utilise the online and secure platform, you are encouraged to supply your email address in order to receive notifications of updates and changes on your Report. This email address will not be visible or accessible by BINGO or Core Integrity.

9. Emergency Disclosures and Public Interest Disclosures

While BINGO encourages Reports to be made internally, individuals can make a Report direct to a regulator. In Australia, the Australian Securities and Investment Commission (ASIC), the Australian Prudential Regulatory Authority (APRA), the Commissioner of Taxation through the Australian Taxation Office (ATO) (in relation to tax affairs only) or another Commonwealth body prescribed by regulations are able to receive disclosures that qualify for protection under the Whistleblower Protection Scheme. The respective websites of ASIC, APRA and the ATO provide further detail about when and how an individual may make a disclosure to each body. In Australia, Reports made to a qualified legal practitioner for the purposes of taking legal advice or legal representation in relation to the operation of the Whistleblower Protection Scheme also qualify for protection (even in the event that the legal practitioner concludes that a disclosure does not relate to a Protected Disclosure).

In Australia, where an individual has previously made a Report to a regulator, that person may be eligible to make a Public Interest Disclosure that qualifies for protection to a journalist or to a Member of Parliament if they meet the criteria for a Public Interest Disclosure or Emergency Disclosure under the Whistleblower Protection Scheme.

10. POLICY BREACHES

To the extent that this Policy imposes obligations on BINGO, it does not form a contractual term, condition or representation.

11. PUBLICATION OF THIS POLICY

This policy will be made available to all GOgetters and will be available on the Company's website.

12. KEY TERMS

12.1 Eligible Recipient

Eligible Recipients include:

- BINGO's external Speak Up Hotline provider, Core Integrity Pty Ltd;
- The Chief People and Culture Officer;
- The Whistleblower Investigations Officer (WIO);
- The Whistleblower Protection Officer (WPO);
- An auditor or a member of an audit team conducting an audit;
- A member of the Executive Committee; or
- A Board Member of BINGO.

12.2 Protected Disclosure

A Report may be a Protected Disclosure under the Whistleblower Protection Scheme, where a Reporter has reasonable grounds to believe the information they supply is true, the Reporter is deemed an eligible Whistleblower and the Report is made to an Eligible Recipient or regulator.

12.3 Regulator

The Australian Securities and Investment Commission (ASIC) is responsible for enforcing the corporate whistleblower protection regime. Whistleblowers can make protected disclosures directly to ASIC or the Australian Prudential Regulation Authority (APRA).

12.4 Report

A report is a disclosure made by a Whistleblower to an Eligible Recipient.

12.5 Reportable Conduct (wrongdoing)

Reportable Conduct is any conduct (e.g. issue or wrongdoing) which could be considered to be:

- Illegal conduct, such as theft, dealing in, or use of illicit drugs, violence or threatened violence, and criminal damage against property;
- Fraud, money laundering or misappropriation of funds;
- Offering or accepting bribery;
- Financial irregularities;
- Failure to comply with, or breach of, legal or regulatory requirements;
- An activity that endangers health, safety or the environment;
- Engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made, or be planning to make, a disclosure;
- Prescribed as Reportable Conduct by regulations made for the purposes of Section 1317AA(5) of the Corporations Act 2001; and/or
- An offence against, or a contravention of, a provision of the following legislation:
 - the Corporations Act 2001;
 - the ASIC Act 2001;
 - the Banking Act 1959;
 - the Financial Sector (Collection of Data) Act 2001;
 - the Insurance Act 1973;
 - the Life Insurance Act 1995;

- the National Consumer Credit Protection Act 2009;
- the Superannuation Industry (Supervision) Act 1993; and/or
- an instrument made under the abovementioned legislation.

12.6 Whistleblower

Any current or former (or family member or dependent of) a:

1. Employee;
2. Supplier,

who:

- Makes a Report relating to any Reportable Conduct;
- Makes the Report to an Eligible Receipt; and

Has reasonable grounds to suspect that the Reportable Conduct has taken place.

12.7 Whistleblower Protection Scheme

The *Corporations Act 2001* (Cth) and the *Taxation Administration Act 1953* (Cth) provide protections for persons who make a “Qualifying Disclosure”

12.8 Whistleblower Investigations Officer (WIO)

A senior member of BINGO who is responsible for assessing, leading, coordinating or overseeing the investigation of protected Whistleblower disclosures in a fair, confidential, objective (without bias) and timely manner. For the purposes of this Policy, the WIO is the General Counsel.

12.9 Whistleblower Protection Officer (WPO)

A senior member of BINGO who is responsible, as far is reasonably practicable, to protect Whistleblowers and is accountable for the provisions of this Policy. For the purposes of this Policy, the WPO is the Internal Audit and Risk Manager.

12.10 GOgetter

GOgetter is an inclusive term for BINGO employees. This captures both employees at common law and persons who are captured by the extended definition of 'employee' which is: 'If a person works under a contract that is wholly or principally for the labour of the person, the person is an employee of the other party to the contract'. GOgetters include -

- Permanent full-time and part-time employees
- Employees on a fixed term or fixed task contract
- Casual employees
- Temporary employees

12.11 Workplace

Any place where work is carried out for BINGO and includes any place where a GOgetter goes, or is likely to be, while at work. This may include offices, factories, shops, construction sites, vehicles or other mobile structures on land or water, as well as working from home.

12.12 Subsidiary and Associated Companies

- | | | |
|---------------------------|----------------------------|-------------------------------------|
| • BINGO Pty Ltd | • BINGO Waste Services Pty | • United Hire Group Pty Ltd |
| • BINGO (VIC) Pty Ltd | • Toro Waste Equipment | • BINGO Queensland Pty Ltd |
| • BINGO Recycling Pty Ltd | • Dial-A-Dump (EC) Pty Ltd | • Sheldon Resource Recovery Pty Ltd |
| • BINGO Bins Pty Ltd | • Djurwa Pty Ltd | |