

Whistleblower Policy

Commercial in Confidence

Purpose

To set down the policy to provide for the confidential reporting and handling of suspected violations of Urbanise's Code of Conduct, policies and procedures, and any applicable laws or regulations ("**Improper Conduct**").

Definitions

Urbanise.com Limited comprises all Urbanise's businesses including the subsidiaries, corporate offices, business units of Urbanise and any completed or future business acquisition.

Protected Disclosure means any communication made in good faith based on reasonable grounds that discloses information in respect of known or suspected Improper Conduct.

Remediation means any steps taken to deal with Improper Conduct, being the appropriate action to be taken in light of the findings of fact, including without limitation disciplinary action, termination of employment or contractual arrangement, coaching or supervision.

Retaliation means any adverse action such as harassment, intimidation, threats, coercion, dismissal or other form of discrimination/bias/prejudice in respect of his employment or contract with Urbanise.

Whistle blower means any Urbanise Staff who makes a Protected Disclosure.

Application

This policy applies to all business units, employees, contractors and Third-Party Intermediaries of Urbanise globally (Urbanise Staff).

Policy

1. Urbanise shall provide confidential and, as far as is permitted by law, anonymous avenues for Urbanise Staff to make Protected Disclosure.
2. Urbanise shall:
 - a. As far as practicably possible, and to the extent permitted by law, maintain confidentiality in respect of all Protected Disclosure; and
 - b. Protect all Whistle blowers from Retaliation.
3. All Protected Disclosure shall be investigated by Urbanise in the manner as set down in the Guidelines to this Policy.



4. All Retaliation shall comprise Improper Conduct and shall be treated accordingly.
5. Urbanise shall apply Remediation to all Urbanise Staff who are found to have:
 - a. committed Improper Conduct;
 - b. committed Retaliation; or
 - c. made purported Protected Disclosure without reasonable grounds or in bad faith.

Procedure/Relationships

The Urbanise Board is responsible for the establishment, approval, and ongoing sponsorship of this policy.

The Urbanise Audit and Risk committee is responsible for reviewing and reporting as specified in this policy.

The CEO is responsible for promulgation of this policy within their business.

Urbanise employees and contractors are responsible for adhering to this Policy.

Further Information

Further questions should be directed to your immediate Manager or your HR representative or Senior Management of the Board.

RESPONSIBLE

The Urbanise Audit and Risk Committee is responsible for the development, compliance monitoring and review of this policy and any related guidelines.

VERSION HISTORY

Version	Approved By	Approval Date	Effective Date	Comments
1	Board	20.2.19	20.2.19	