



SEAFARMS GROUP LIMITED

WHISTLEBLOWER POLICY

1 JULY 2022

APPROVED BY THE BOARD ON 27 SEPTMEBER 2022

OUR COMMITMENT

Seafarms Group Limited (**Seafarms**) has a long-standing commitment to conducting its business with honesty and integrity. Seafarms is committed to the highest standards of conduct and ethical behaviour in all of our business activities, and to promoting and supporting a culture of honest and ethical behaviour, compliance and good corporate governance.

Seafarms encourages the reporting of any instances of suspected unethical, illegal, fraudulent or undesirable conduct involving Seafarms' businesses, and will ensure that those persons who make a report shall do so without fear of intimidation, disadvantage or reprisal.

This Policy details the framework for receiving, investigating and addressing allegations of criminal, dishonest or unethical behaviour where that behaviour concerns the activities of Seafarms or current and former officers, agents, employees and contractors of Seafarms.

Executive Director
Seafarms Group

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1.0	26 June 2020		Policy adopted
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1. OBJECTIVES

The objectives of this Policy are to:

- (a) encourage the reporting of Reportable Conduct;
- (b) ensure that individuals who disclose Reportable Conduct can do so safely and securely and in the knowledge that they will be supported and protected from victimisation, detriment and retaliation;
- (c) ensure any reports of Reportable Conduct are dealt with appropriately and in a timely way;
- (d) provide transparency as to Seafarms' framework for receiving, handling and investigating disclosures of Reportable Conduct;
- (e) afford natural justice and procedural fairness to anyone who is the subject of an allegation of Reportable Conduct;
- (f) support Seafarms' values and Code of Conduct policy;
- (g) support Seafarms' long-term sustainability and reputation;
- (h) meet Seafarms' legal and regulatory obligations; and
- (i) to align with the ASX Corporate Governance Principles and Recommendations and relevant standards.

2. WHO CAN MAKE A DISCLOSURE UNDER THIS POLICY?

The Policy applies to:

- (a) a current or former:
 - i. employee of Seafarms or of a related body corporate;
 - ii. officer of Seafarms or of a related body corporate;
 - iii. contractor, or an employee of a contractor who has supplied goods or services to Seafarms; or
- (b) a spouse, relative or dependent of one of the people referred to at (a);
- (c) who makes or attempts to make a Protected Disclosure (whether anonymously or not) (each an **eligible whistleblower**).

3. DISCLOSURES COVERED BY THIS POLICY

3.1. WHAT IS REPORTABLE CONDUCT?

A **Protected Disclosure** is a report of **Reportable Conduct** under this Policy by an eligible whistleblower who has reasonable grounds to suspect any of the following conduct (or the deliberate concealment of such conduct) in relation to Seafarms or a related body corporate (including their employees or officers):

- (a) conduct which constitutes an improper state of affairs or circumstances in relation to Seafarms or a related body corporate;
- (b) fraud, negligence, default, breach of trust and breach of duties under the Corporations Act 2001 (Cth) (Corporations Act);
- (c) conduct which constitutes an offence against, or a contravention of:

- i. the Corporations Act or an instrument made under it, or other financial sector laws enforced by the Australian Securities Investments Commission (ASIC) or the Australian Prudential Regulation Authority (APRA);
 - ii. any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more; or
- (d) conduct which represents a danger to the public or the financial system (even if the conduct does not involve a breach of a particular law).

Examples of Reportable Conduct include:

- i. illegal conduct, such as theft, dealing in or use of illicit drugs, violence or threatened violence or criminal damage to property;
- ii. fraud, money laundering or misappropriation of funds;
- iii. offering or accepting a bribe;
- iv. financial irregularities;
- v. failure to comply with, or breach of, legal or regulatory requirements;
- vi. unethical or improper conduct which raises significant implications for Seafarms. This may include:
 - A. serious and/or systematic breaches of Seafarms' policies;
 - B. bullying or harassment;
 - C. misuse of sensitive or confidential information;
 - D. unfair or unethical business behaviour or practices in dealing with an investor, other customer, contractor or supplier (including a potential investor, customer, contractor, supplier) or their employees;
- vii. conduct likely to damage Seafarms' financial position or reputation;
- viii. victimisation for making or proposing to make a disclosure under this Policy; and
- ix. any behaviour that poses a serious risk to the health and safety of any person at the workplace, or to public health or safety, or the environment (even where this does not constitute a breach of any law).

3.2. WHAT IS NOT REPORTABLE CONDUCT?

Reportable Conduct does not generally include a “**personal work-related grievance**”.

Personal work-related grievances are grievances relating to a person's current or former employment with Seafarms which have, or tend to have, implications for the person personally but do not:

- (a) have significant implications for Seafarms or a related body corporate; or
- (b) relate to any conduct, or alleged conduct, regarding Reportable Conduct.

Examples of personal work-related grievances include, but are not limited to:

- (a) an interpersonal conflict between the discloser and another employee;
- (b) a decision relating to the engagement, transfer or promotion of the discloser;
- (c) a decision relating to the terms and conditions of engagement of the discloser; and
- (d) a decision to suspend or terminate the engagement of the discloser, or otherwise to discipline the discloser.

Disclosures relating to these matters do not qualify for whistleblower protection under this Policy or Australian law.

A personal work-related grievance may still qualify for protection if:

- (a) it includes information about misconduct, or information about misconduct includes or is accompanied by a personal work-related grievance (mixed report);
- (b) the entity has breached employment or other laws punishable by imprisonment for a period of 12 months or more, engaged in conduct that represents a danger to the public, or the disclosure relates to information that suggests misconduct beyond the discloser's personal circumstances;
- (c) the discloser suffers from or is threatened with detriment for making a disclosure (see RG 270.96–RG 270.97); or
- (d) the discloser seeks legal advice or legal representation about the operation of the whistleblower protections under the Corporations Act.

4. HOW TO MAKE A REPORT

4.1. ELIGIBLE RECIPIENTS OF DISCLOSURES UNDER THIS POLICY

Eligible whistleblowers must make a disclosure directly to one of the Recipients referred to in this section to qualify for protection as a whistleblower under this Policy and under Australian law.

Seafarms would like to identify and address wrongdoing as early as possible. We therefore encourage eligible whistleblowers to disclose Reportable Conduct to one of the following Recipients:

(a) External Reporting Process (Your Call)

If you are not comfortable or able to report misconduct internally, you may report it to Seafarms external and independent whistleblowing service provider. Seafarms has contracted Your Call Whistleblowing Solutions ("Your Call") to receive and manage your report with impartiality and confidentially.

This option allows you to:

- remain completely anonymous
- identify yourself to Your Call only
- identify yourself to both Your Call and Seafarms

The Your Call reporting options include:

- Website <https://www.yourcall.com.au/report>
24/7
- Telephone 1300 790 228
9am and 12am, recognised business days, AEST

Online reports can be made via the website address listed above. You will be required to enter Seafarms unique identifier code (SFG).

Your Call remains the intermediary at all times, receiving and forwarding communication between all parties. The Seafarms Officers who will have access to your reports include:

1. Rod Dyer – CEO
2. Ian Leijer – CFO
3. Harley Whitcombe (alternative officer) – Company Secretary

Your Call can circumvent any of the above Officers upon your request.

You be able to securely upload any relevant documentation and/or material relevant to your disclosure.

After making a disclosure, you will be provided with a unique Disclosure Identification Number (DIN) and access to a secure online Message Board.

The Message Board allows ongoing anonymous communication with Your Call and/or Seafarms. Your Call remains the intermediary at all times, receiving and forwarding communication between all parties. The Message Board can be used to receive updates, share further information/evidence and request support or report retaliation. If you cannot access the Message Board, you can contact Your Call via phone (above) for verbal updates.

National Relay Service

If you are deaf, or have a hearing or speech impairment, you can contact Your Call online or through the National Relay Service. Simply choose your contact method at www.relayservice.gov.au and request Your Call's hotline 1300 790 228

If you have difficulty speaking or understanding English, contact us through the Translating and Interpreting Service (TIS) 131 450 and ask for Your Call on 1300 790 228

Other options:

- (b) WPO - CEO (telephone: +61 477 774 901, address: Seafarms, Level 10, 490 Upper Edward Street, Spring Hill QLD 4000);
- (c) senior manager of Seafarms or a related body corporate; or
- (d) a director of Seafarms.

However, if you do not wish to raise your concern via any of the above methods, eligible whistleblowers may still qualify for protection as a under Australian law if they:

- make a disclosure of Reportable Conduct to ASIC, APRA or any other Recipient as identified in Annexure A;
- make a disclosure of information to an external legal practitioner for the purposes of obtaining legal advice or representation about making a disclosure under this Policy (even if the external legal practitioner concludes that a disclosure does not concern Reportable Conduct).

If you require additional information in relation to making a disclosure of Reportable Conduct, you may discuss the matter in confidence with the WPO. In the event you do not formally make a disclosure under this Policy, Seafarms may nevertheless be compelled to act on the information you have provided if that information reasonably suggests Reportable Conduct has occurred or may occur.

In limited circumstances, an eligible whistleblower may make a public interest disclosure or an emergency disclosure to a journalist or parliamentarian which qualifies for protection in accordance with Australian whistleblowing laws.

It is important to understand the criteria for making a disclosure in these circumstances, which includes, among other things:

- ▶ the discloser has first made the disclosure to ASIC or APRA; and
- ▶ the discloser has provided written notice to that entity that they now intend to make a public interest or emergency disclosure in relation to this issue. In the case of public interest disclosures, at least 90 days must have passed since the original disclosure.
 - ▶ A 'public interest disclosure' is the disclosure of information to a journalist or a parliamentarian, where:
 - (a) at least 90 days have passed since the discloser made the disclosure to ASIC, APRA or another Commonwealth body prescribed by regulation;
 - (b) the discloser does not have reasonable grounds to believe that action is being, or has been taken, in relation to their disclosure;
 - (c) the discloser has reasonable grounds to believe that making a further disclosure of the information is in the public interest; and
 - (d) before making the public interest disclosure, the discloser has given written notice to the body in RG 270.75(a) (i.e. the body to which the previous disclosure was made) that:
 - i. includes sufficient information to identify the previous disclosure; and
 - ii. states that the discloser intends to make a public interest disclosure.
 - ▶ An 'emergency disclosure' is the disclosure of information to a journalist or parliamentarian, where:
 - (a) the discloser has previously made a disclosure of the information to ASIC, APRA or another Commonwealth body prescribed by regulation;
 - (b) the discloser has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment;
 - (c) before making the emergency disclosure, the discloser has given written notice to the body in RG 270.76(a) (i.e. the body to which the previous disclosure was made) that:
 - (i) includes sufficient information to identify the previous disclosure; and
 - (ii) states that the discloser intends to make an emergency disclosure; and
 - (d) the extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the journalist or parliamentarian of the substantial and imminent danger.

4.2. INFORMATION YOU SHOULD PROVIDE

When making a disclosure under this Policy, you should provide as much information as possible, including the details of the Reportable Conduct, people involved, dates, locations and any other evidence or material which may be relevant.

You must have reasonable grounds to believe that the information you are disclosing is true, however you will still qualify for protection under this Policy and under Australian law if the information you provide turns out to be incorrect.

4.3. ANONYMOUS REPORTS

Seafarms encourages eligible whistleblowers to provide their name when making a disclosure under this Policy, as it will assist Seafarms to investigate and address their report.

However, if you do not want to reveal your identity, you may make an anonymous disclosure under this Policy, and may choose to remain anonymous over the course of any investigation and after the investigation is finalised.

There are various mechanisms available for protecting your anonymity when making a disclosure under this Policy, including:

- communicating through Your Call independent Whistleblower services;
- using an anonymised email address;
- adopting a pseudonym for the purpose of your disclosure.

If you choose to make an anonymous disclosure under this Policy, any investigation will be conducted as best as possible in the circumstances. You may refuse to answer questions that you feel could reveal your identity at any time during the investigation or at any other time.

Disclosures which are made anonymously will still be protected under this Policy and under Australian law. However, Seafarms may be unable to provide you with the same level of practical support and protection if you do not provide your name.

If you wish to remain anonymous in making a disclosure of Reportable Conduct, you should, where possible, maintain ongoing communication with Seafarms so that Seafarms can seek further information or clarification to assist in investigating and addressing your disclosure, and provide you with feedback and updates regarding the progress of any investigation and outcomes. Using the Your Call service is the best way to do this.

5. HANDLING AND INVESTIGATING A DISCLOSURE

All disclosures made under this Policy will be treated sensitively and seriously, and will be dealt with promptly, fairly and objectively.

Where you have elected to provide your name in making the disclosure, it will only be disclosed with your consent, or in exceptional circumstances where the disclosure is allowed or required by law. If you have any concerns regarding this issue, you should discuss them with the Recipient. Section 6 sets out further information regarding how Seafarms will protect the identity of eligible whistleblowers who make Protected Reports.

5.1. INITIAL ASSESSMENT OF THE DISCLOSURE

Subject to the confidentiality requirements outlined in this Policy, all disclosures of Reportable Conduct made pursuant to this Policy must be referred to the Whistleblowing Investigation Officer (WIO) (or, where there is a conflict of interest, another appropriate person). The identity of the discloser will not be shared with the WIO unless the discloser consents to this.

The current WIO is the Seafarms Group Limited Chief Executive Officer.

The WIO will assess the information provided and determine:

- (a) whether the disclosure relates to Reportable Conduct and qualifies for protection under this Policy;
- (b) whether an investigation is necessary or appropriate, taking into account whether sufficient information exists to allow the disclosure to be investigated.

Seafarms may not be able to undertake an investigation in some circumstances, including if it is not able to contact the whistleblower to obtain necessarily consent or information to enable an investigation to proceed in a timely manner.

All Protected Disclosures will ultimately be reported to the Audit and Risk Committee, either as part of the Whistleblower Register, or as standalone agenda items in circumstances where the WIO determines this is warranted or necessary. Reports will be a “no names” basis to maintain the confidentiality of matters raised under this policy. When the subject matter of the report could be materially price sensitive, the person receiving the report should consider whether any action needs to be taken under the Continuous Disclosure policy (while maintaining confidentiality to the full extent required by law).

5.2. INVESTIGATING A DISCLOSURE

Where the WIO is satisfied that an investigation should be conducted, the WIO will determine the appropriate investigation process, including:

- (a) the nature and scope of the investigation;
- (b) who will conduct the investigation (including whether an external investigator should be engaged);
- (c) the nature of any technical, financial or legal advice that may be required; and
- (d) the timeframe for the investigation (having regard to the nature and scope of the Reportable Conduct, the complexity of the issues and any other relevant factors).

5.3. COMMUNICATION WITH WHISTLEBLOWER

If you make a disclosure of Reportable Conduct under this Policy and are able to be contacted, Seafarms will contact you to acknowledge receipt of your disclosure, within 3 business days.

In addition, where practicable, once the matter has been passed to the WIO, you will be contacted within 14 business days to discuss next steps and during key stages in the process such as:

- when the investigation process has begun (or if no investigation is to be conducted, to advise you of this);
- when the investigation is in progress.

provided that you are able to be contacted and that the contact does not compromise your anonymity.

In some circumstances, Seafarms may be required to refer an allegation of Reportable Conduct to the Australian Federal Police or other agency (e.g. ASIC). In such circumstances, Seafarms may not be able to keep you informed on the progress of a Protected Disclosure.

5.4. FAIR TREATMENT

The WIO will ensure that any employee who is the subject of a disclosure made under this Policy is treated fairly during the course of an investigation of Reportable Conduct.

Employees will have the opportunity to be informed of, and respond to, any report of Reportable Conduct made against them during the investigation.

5.5. INVESTIGATION FINDINGS

Seafarms will apply principles of procedural fairness and natural justice to the conduct of any investigation conducted under this Policy.

Once the investigation is completed, the WIO will determine the recommended course of action (if any) that Seafarms should take in response to the findings. Such action may include a disciplinary process or another form of escalation of the report within or outside of Seafarms and its subsidiaries.

The method of documenting and reporting the findings of any investigation will depend on the nature of the disclosure. If appropriate, and subject to any applicable confidentiality, privacy or legal constraints, the WIO will notify the whistleblower, and any employee who is the subject of a disclosure, of the outcome of the investigation. However, there may be circumstances where it is not appropriate to provide details of the outcome to the whistleblower or the person who is the subject of the disclosure.

Seafarms will ensure that, in accordance with this Policy, publication of an investigation's findings will not breach the whistleblower's confidentiality.

6. PROTECTIONS AVAILABLE

In order to be eligible for the protections under this Policy, you must:

- (a) be an eligible whistleblower;
- (b) make a disclosure of Reportable Conduct to an eligible Recipient or as otherwise provided in accordance with the Policy; and
- (c) be acting honestly with genuine or reasonable belief that the information in the allegation is true or likely to be true.

You are still responsible for your own actions. These protections do not prevent action being taken against a person for any wrongdoing that they are involved in that is revealed in their report.

The protections in this Policy apply not only to disclosures of Reportable Conduct made to Eligible Recipients, but also to:

- disclosures made to legal practitioners for the purpose of obtaining legal advice or representation regarding the operation of whistleblowing provisions under Australian law;

- disclosures to ASIC or APRA that are protected disclosures under the Corps Act, or to the ATO under the Taxation Administration Act for tax related matters; and
- “public interest” and “emergency” disclosures that are made in accordance with the Corporations Act.

You can still qualify for the protections under this Policy even if your disclosure turns out to be incorrect or your legal practitioner has advised you that your disclosure is not Reportable Conduct.

If you have made a Protected Disclosure you must, at all times during the reporting process, continue to comply with this Policy.

6.1. IDENTITY PROTECTION

If you make a disclosure of Reportable Conduct in accordance with this Policy, the Recipient cannot disclose your identity, or information that is likely to lead to your identification, except:

- (a) to ASIC, APRA, or a member of the Australian Federal Police;
- (b) to a legal practitioner for the purpose of obtaining legal advice or legal representation about the whistleblowing provisions of the Corporations Act;
- (c) to a person or body prescribed by the Corporations Act regulations; or
- (d) with your consent.

The information contained in a disclosure made by you under this Policy may be disclosed without your consent if the disclosure of this information is reasonably necessary to investigate the issues raised in the report, provided that:

- (a) the information does not include your identity; and
- (b) all reasonable steps have been taken by Seafarms to reduce the risk that your identity will be revealed from the information provided.

It is unlawful for a person to identify a whistleblower, or disclose information that is likely to lead to the identification of the whistleblower, outside of the circumstances listed above.

Seafarms will take all reasonable steps to reduce the risk that a person will be identified as a result of making a disclosure under this Policy and to ensure their identity remains confidential throughout the investigation process. Measures that Seafarms may take to protect a whistleblower’s confidentiality include:

- (a) ensuring that disclosures will be handled and investigated by qualified staff;
- (b) redacting all personal information or reference to a whistleblower witnessing an event;
- (c) using gender neutral terms when referring to a whistleblower;
- (d) where possible, liaising with a whistleblower to identify any aspects of their disclosure that could inadvertently identify them;
- (e) securely storing documents (whether electronic or paper) relating to disclosures;
- (f) limiting access to information to those who are investigating the disclosure;
- (g) restricting the number of people who may be made aware of a whistleblower’s identity;
- (h) putting in place measures to prevent information about investigations of disclosures being sent to an email address or printer that can be accessed by other staff;
- (i) reminding those persons handling investigations of their confidentiality obligations.

The unauthorised disclosure of a whistleblower's identity, or information which may identify the whistleblower, may be regarded as a disciplinary matter to be dealt with in accordance with Seafarms' disciplinary procedures. It may also, in some circumstances, be a criminal and civil offence under the Corporations Act.

Any concerns regarding breach of confidentiality should be raised with the WIO. You may also lodge a complaint with a regulator, such as ASIC, APRA or the ATO, for investigation.

6.2. PROTECTION FROM DETRIMENT

A person must not cause, or threaten to cause, detriment to a person because they have made, may make, proposes to make or could make, a disclosure that qualifies for protection under this Policy and Australian law.

Examples of detrimental conduct include dismissal, discrimination, harassment or intimidation, altering a person's position in employment to their prejudice, altering an employee's position or duties to their disadvantage, physical or psychological harm; or damage to a person's property, reputation, business or financial position.

Actions that are not detrimental conduct include:

- administrative action that is reasonable for the purpose of protecting a discloser from detriment (e.g. moving a person who has made a disclosure from their immediate work area to another location where necessary to prevent detriment from occurring);
- managing a whistleblower's unsatisfactory work performance, where the action is in line with Seafarms' performance management framework.

Seafarms is committed to making sure that eligible whistleblowers are treated fairly and do not suffer detriment for making a Protected Disclosure under this Policy. Seafarms may take the following measures to ensure that eligible whistleblowers who have made a protected disclosure are protected from detriment:

- (a) provide a whistleblower with support services including counselling or other professional services;
- (b) put in place processes for assessing risks of detriment against the whistleblower and other persons, which will commence as soon as possible after receiving a disclosure;
- (c) assess the opportunity to reassign or relocate the whistleblower to another role at the same or substantially the same level;
- (d) develop processes for ensuring that management are aware of their responsibilities to maintain the confidentiality of disclosure, address the risks of isolation or harassment, manage conflicts, and ensure fairness when managing the performance of, or taking other management action relating to, a whistleblower.

Seafarms will investigate any reports of adverse action taken against a person who is eligible for protection under this Policy. If proven, those who have engaged in such behaviour may be subject to disciplinary proceedings and potential criminal and civil liability under the Corporations Act or the Taxation Administration Act.

6.3. WHISTLEBLOWER PROTECTION OFFICER (WPO)

Where you have made a disclosure of Reportable Conduct which is eligible for protection under this Policy, Seafarms may appoint a WPO to support and help protect you. Seafarms can only appoint a WPO where you have agreed to share your identity with the WPO.

The role of the WPO is to:

- (a) safeguard the interests of a whistleblower;
- (b) assess the immediate welfare and protection needs of a whistleblower and, where the whistleblower is an employee, assist in providing the whistleblower with a supportive work environment; and
- (c) respond as appropriate and necessary to any concerns or reports of victimisation or detriment by a whistleblower.

For more information or to request the appointment of a WPO under this Policy, please contact the Seafarms Chief Executive Officer.

6.4. OTHER REMEDIES AND PROTECTIONS

There are a number of other legal protections if you make a protected disclosure under Australian whistleblowing laws including:

- (a) in some circumstances (e.g. if the disclosure has been made to a regulator) the information you provide is not admissible in evidence against you in criminal proceedings or in proceedings for the imposition of a penalty, other than proceedings in respect of the falsity of the information;
- (b) you are protected from liability in relation to your disclosure:
 - civil liability (e.g. any legal action against you for breach of an employment contract, duty of confidentiality or other contractual obligation);
 - criminal liability (e.g. attempted prosecution for unlawfully releasing information, or other use of your disclosure against you in a prosecution (other than for making a false disclosure); or
 - administrative liability (e.g., disciplinary action for making the disclosure); and
- (c) no contractual or other remedy may be enforced or exercised against you based on the disclosure.

The protections do not grant eligible whistleblowers immunity from any misconduct they were involved in that is revealed in the disclosure.

6.5. CONSEQUENCES OF MAKING A FALSE REPORT

Anyone who knowingly makes a false report of Reportable Conduct, or who otherwise fails to act honestly with reasonable belief in respect of the report may be subject to disciplinary action, including dismissal.

The disciplinary action or sanction will depend on the severity, nature and circumstance of the false report.

7. RECORD KEEPING AND ACCOUNTABILITY

Seafarms' Chief Financial Officer is the officer responsible for:

- (a) establishing and maintaining the Independent Whistleblower Service;
- (b) generating and distributing the Independent Whistleblower Service details to the WPOs and WIO;
- (c) communicating this Policy and the Independent Whistleblower Service details to Seafarms business units and members; and
- (d) otherwise ensuring maintenance and adherence to this Policy.

Seafarms will establish and maintain a Whistleblower Register, which contains de-identified details of the Protected Disclosures received in accordance with this Policy.

The WIO will:

- (a) coordinate and support the impartial investigation of Protected Disclosures;
- (b) submit a six monthly summary report to the Audit and Risk Committee, which whilst maintaining confidentiality, provides statistics of:
 - i. the number of reports received, per quarter;
 - ii. for each report, the type of misconduct alleged, the level of seniority of the alleged wrongdoer and the level of perceived risk;
 - iii. for each report, the time taken to investigate it;
 - iv. the conclusion of each investigation (upholding or dismissing the report) and the nature of the action taken (such as disciplinary action).
- (c) periodically review the Whistleblower Register to ensure that proper processes are being followed and to identify time lag between date of alleged incident and date of reporting.

8. TRAINING AND INFORMATION

The Policy will be made available on Seafarms' website which can be accessed at: www.seafarms.com.au

All new employees must receive a copy of this Policy as part of the employee's induction training. All employees should receive regular updates on this Policy.

All employees who are Recipients, WPOs or WIOs must receive training on their roles, obligations and responsibilities under this Policy prior to any such appointment and at least annually thereafter. This will be the responsibility of the Company Secretary until such time as a Human Resources manager is appointed.

9. MONITORING AND REVIEW

Seafarms will conduct a review of the matters reported under this Policy as appropriate to enable identification and management of any emerging risks. The General Counsel and the Audit and Risk Committee of Seafarms will review this Policy at least every two years.

The General Counsel and the Audit and Risk Committee may, in its discretion, adjust or exclude a specific requirement of this Policy from time to time, either generally or on a case by case basis.

This Policy may be amended, ceased or replaced, by resolution of the Board.

ANNEXURE A

WHISTLEBLOWER PROTECTIONS UNDER AUSTRALIAN LAW

A whistleblower who discloses specified information to certain people or organisations is protected by Australian law.

Examples of this information and recipients are outlined in the following table:

It is important to note that a disclosure must be made directly to one of the above specified recipients in order to qualify for protection as a whistleblower under Australian law.

The law also protects certain disclosures made in “emergency” and “public interest” circumstances, which allows for the disclosure to be made to a journalist or parliamentarian. You should seek independent legal advice before making a “public interest” or “emergency” disclosure.

Information reported or disclosed	Recipient of disclosed information
<p>Information about actual or suspected misconduct, or an improper state of affairs or circumstances in relation to Seafarms or a related body corporate.</p> <p>This includes information that Seafarms or any officer or employee of Seafarms has engaged in conduct that:</p> <ul style="list-style-type: none">• contravenes or constitutes an offence against the following Commonwealth legislation: <i>Corporations Act; Australian Securities and Investments Commission Act 2001; Banking Act 1959; Financial Sector (Collection of Data) Act 2001; Insurance Act 1974; Life Insurance Act 1973; National Consumer Credit Protection Act 2009; and Superannuation Industry (Supervision) Act 1993</i>;• represents a danger to the public or financial system;• constitutes an offence against any law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more. <p>Note that personal work-related grievances are not protected disclosures under the law, except as noted below.</p>	<ul style="list-style-type: none">• Your Call Independent Whistleblower Service;• Seafarms Chief Executive Officer;• an officer, director or senior manager of Seafarms or a related body corporate;• an auditor or member of an audit team conducting an audit of the Seafarms or a related body corporate;• ASIC or APRA;• a legal practitioner for the purpose of obtaining legal advice or legal representation regarding the operation of the whistleblowing provisions under the Corporations Act.
<p>Information that may assist the Commissioner of Taxation to perform his or her functions under a taxation law in relation to Seafarms or a related body corporate.</p>	<ul style="list-style-type: none">• Commissioner of Taxation

Information about misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of Seafarms or a related body corporate.

- An auditor, or a member of an audit team conducting an audit, of Seafarms or a related body corporate.
- a registered tax agent or BAS agent who provides tax services or BAS services to Seafarms or a related body corporate.
- a director, secretary or senior manager of Seafarms or a related body corporate.
- An employee or officer of Seafarms or a related entity who has functions or duties that relate to the tax affairs of Seafarms or a related body corporate.

Protections and remedies available under Australian law

In addition to the protections specified in this Policy, additional legislative protections may also be available to eligible whistleblowers, including but not limited to:

- compensation for loss, damage or injury suffered as a result of detrimental conduct arising from making a disclosure or where an entity failed to take reasonable cautions and exercise due diligence to prevent the detrimental conduct;
- an injunction to prevent, stop or remedy the effects of the detrimental conduct;
- an order requiring an apology for engaging in the detrimental conduct;
- if the detrimental conduct wholly or partly resulted in the termination of an employee's employment: reinstatement to their position; and
- any other order the court thinks appropriate.

You are encouraged to seek independent legal advice in relation to these matters.