Whistleblower Policy

1.0 Context

The purpose of the new whistleblower regime as provided for by the Corporations Act 2001 (Cth) is to encourage individuals to report any potential wrongdoing in the corporate sector by enhancing the protections given to whistleblowers. One of the aims of the new regime is to encourage individuals to report wrongdoing by having in place a transparent whistleblowing policy, as this is key to good risk management and corporate governance.

UQ Sport Ltd (UQ Sport) is bound by the protections afforded to whistleblowers under the Corporations Act.

UQ Sport encourages the reporting of any instances of suspected unethical, illegal, fraudulent or undesirable conduct involving any of its business, and has a whistleblower policy to ensure that any person who makes a report is aware of the protections afforded to them.

To ensure good corporate governance UQ Holdings Pty Ltd (UQH) has approved this Policy both for itself and UQ Sport. The Board of UQ Sport is responsible for the implementation and management of the policy. Ultimately, the University of Queensland's Integrity and Investigations Unit will have oversight of any reports made to ensure that any issues that may affect UQH or its Entities are addressed.

2.0 Objectives

The objectives of this policy are to:

- demonstrate the commitment of UQ Sport to protect individuals who disclose potential wrongdoing;
- encourage individuals to disclose wrongdoing;
- protect individuals who disclose wrongdoing;
- ensure that individuals who disclose wrongdoing are aware of the protections afforded to them;
- ensure that any disclosures of wrongdoing are dealt with appropriately and in a timely way;
- provide transparency as to the framework for receiving, handling and investigating disclosures of wrongdoing; and
- Comply with obligations under the Corporations Act.

3.0 Who can make a disclosure under this Policy?

This policy applies to eligible whistleblowers who make or attempt to make protected disclosures, whether anonymously or not.

4.0 Disclosures covered by this Policy

4.1 What is a protected disclosure?

A protected disclosure is a disclosure of wrongdoing under this policy by an eligible whistleblower who has reasonable grounds to suspect the occurrence of wrongdoing.

4.2 Examples of wrongdoing

Examples of wrongdoing include:

- illegal conduct, such as theft, dealing in or use of illicit drugs, violence or threatened violence or criminal damage to property;
- fraud, money laundering or misappropriation of funds;
- offering or accepting a bribe;
- financial irregularities;
- failure to comply with, or breach of, legal or regulatory requirements;
- Unethical or improper conduct which raises significant implications for UQ Sport. This may include: Serious and/or systematic breaches of policies;
    - discrimination, bullying, harassment or sexual harassment;
    - misuse of sensitive, private or confidential information; and
    - unfair or unethical business behaviour or practices in dealing with an investor, customer, contractor or supplier (including a potential investor, customer, contractor, supplier) or their employees;
- conduct likely to damage UQ Sport's financial position or reputation;
- victimisation for making or proposing to make a disclosure under this policy;
- 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); and
- the deliberate concealment of any of the above conduct.

4.3 What is not wrongdoing?

Wrongdoing does not generally include a personal work-related grievance. For a complaint about a personal work-related grievance, refer to UQ Sport's *Grievance Resolution Policy and Procedure*.

However, a personal work-related grievance may still qualify for protection under this policy if:

- it includes information about wrongdoing, or forms part of a disclosure which also includes wrongdoing;
- the disclosure is that the person has suffered, or has been threatened with, a detriment for making a disclosure of wrongdoing; or
- an individual has made the disclosure to a legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the whistleblower protections under the Corporations Act.

5.0 How to make a disclosure

5.1 Who can disclosures be made to?

Eligible whistleblowers must make a disclosure directly to an eligible recipient referred to in this section to qualify for protection as a whistleblower under this policy and under Australian law.

5.2 How is a whistleblower disclosure made?

Eligible whistleblowers may disclose wrongdoing to one of the following eligible recipients:

Eligible recipient	Contact Details
For any disclosure – the Associate Director of The University of Queensland's Integrity and Investigations Unit	Address: Level 2, Cumbrae-Stewart Building (72), The University of Queensland, St Lucia QLD 4072, Australia. Telephone: +61 7 336 51366 Email (General Enquiries): iiu@uq.edu.au
If the disclosure concerns UQ Sport or a UQ Sport employee (except for the Chief Executive Officer) – the Chief Executive Officer	Miss Pamela Abrey, Acting Chief Executive Officer Email: PAbrey@uqsport.com.au
If the disclosure concerns the Chief Executive Officer of UQ Sport – a director or the company secretary	Mr Andrew Flannery, Chair of the Board Email: a.flannery@uq.edu.au Ms. Joanna Spanjaard, Director Email: j.spannjaard@uq.edu.au Ms. Mikaeli Costello, Director Email: m.costello@uq.edu.au Prof John Cairney, Director Email: j.cairney@uq.edu.au Ms. Anita White, Secretary Email: uqs.secretary@uq.edu.au

6.0 Meta Data for Document Management

Web Links	Code of Conduct Policy Grievance Resolution Policy
Approval Authority	Board
Last Approval Date	15/07/2025
Next Review Date	30/07/2026
Audience / Users	All UQ Sport staff, Contracts, Volunteers, Board Members, Suppliers and Clients
Notes	N/A