

# De'Longhi Australia Pty Ltd

## Whistleblower and Improper Conduct Policy and Procedure

### 1. POLICY

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At De'Longhi, we are committed to conducting our business in a professional, lawful and ethical manner.

It is the duty and responsibility of all employees to behave in a fair and legal manner and to be seen to be doing so.

Improper conduct and, in particular, fraud, corruption or anticompetitive conduct, will be viewed by De'Longhi as a serious contravention of the terms of your employment and will result in disciplinary action, including dismissal.

Any person or organisation who has any concern about any inappropriate or improper conduct or non-compliance with De'Longhi policies, procedures or applicable laws by any member of De'Longhi's staff or management team or any of De'Longhi's agents or contractors ("**De'Longhi Personnel**") is invited to lodge a formal complaint, (a "**Complaint**") which shall be dealt with in accordance with this Policy. An employee or external party who reports alleged improper conduct, including fraud or corruption is known as a 'whistleblower'.

De'Longhi is committed to complying with the Australian Standard for Whistleblower Protection programs<sup>1</sup>.

### 2. PURPOSE OF THIS POLICY AND PROCEDURE

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The purpose of this Policy and Procedure is to:

- encourage the reporting of improper conduct (including potentially fraudulent and corrupt conduct) by employees, suppliers, customers and other third parties;
- assist in obtaining information on suspected fraudulent behaviour, corruption and improper conduct so that such conduct can be addressed;
- provide a Helpline which can be used for reporting improper conduct; and
- help protect people who report improper conduct in good faith.

The benefits of the Program include deterring employees from improper conduct, assisting with identifying and addressing improper conduct, and protecting informants by generally allowing them to remain anonymous.

### 3. INFORMANT PROTECTION

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De'Longhi encourages employees, suppliers, customers and other third parties to provide information about improper conduct by calling the Help Line (refer to section 4 below).

All suspected occurrences of improper conduct will be taken seriously and thoroughly investigated in accordance with De'Longhi's Investigation Guidelines.

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<sup>1</sup> The current standard is AS8004-2003: Whistleblower protection programs for entities.

If an informant does not wish to reveal their identity when providing information about improper conduct, we will protect their identity and will not disclose it without their consent, unless we are required by law to do so or it is absolutely necessary in order to investigate serious allegations. An informant may also choose to remain entirely anonymous, not even disclosing their identity to the person to whom they provide the relevant information.

However, please note that if an offence is likely to have occurred, it may be necessary for the informant to assist the police with a civil or criminal investigation in accordance with the law.

De'Longhi will take all reasonable measures to protect individuals against any detrimental actions which may arise as a consequence of providing or disclosing information relating to suspected improper conduct. However, false reporting through these channels will be regarded as a serious matter and may result in disciplinary action.

#### **4. CONFIDENTIAL HELP LINE**

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A key component of De'Longhi's Whistleblower Policy and Procedure is the confidential help line established to allow employees and other external parties (contractors, suppliers and customers) to provide information, make a complaint or seek assistance in relation to improper conduct which has occurred or is occurring at De'Longhi.

The Help Line, which is maintained by the Compliance Officer, can be reached at + 61 2 9426 7019 or + 61 2 9426 7031.

All suspected occurrences of improper conduct will be taken seriously and thoroughly investigated.

#### **5. PREPARING AND LODGING A COMPLAINT UNDER THE WHISTLEBLOWER AND IMPROPER CONDUCT POLICY AND PROCEDURE**

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##### **5.1 Lodging a Complaint**

Complaints may be oral or in writing. In each case a Informant needs to identify the following matters:

- their name, organisation and contact details (phone and address) (if they are prepared to give this information);
- nature of the Complaint;
- all relevant facts giving rise to the Complaint;
- name of the relevant De'Longhi Department or business which is the subject of the Complaint;
- the name(s) of all De'Longhi Personnel involved;
- an acknowledgement that the information they have provided is: (i) a true and accurate representation of the events which have occurred and that have led to this complaint; and (ii) does not contain any misleading statements or omissions; and
- whether they consent to the disclosure of their name (if provided).

Complaints should be addressed to the **Compliance Officer, De'Longhi** by:

- phone on + 61 2 9426 7031; or
- email to [afrettingham@delonghi.com.au](mailto:afrettingham@delonghi.com.au); or
- fax to + 61 2 9426 7033, or

- mail to the following address:

**Compliance Officer, De'Longhi**  
Unit 3A, 43 Lyn Parade  
Prestons, NSW 2170

## **5.2 The Process**

The Compliance Officer, and anyone charged by the Compliance Officer with responsibility for investigating a Complaint will:

- immediately acknowledge the informant's complaint (either during the phone call from the Informant or by way of email or fax); and
- subject to the steps referred to in this section and the investigation guidelines and procedure set out in section 7, resolve the complaint within 14 days, wherever possible. If the complaint cannot be resolved within 14 days, advise the Informant and keep the informant advised of progress of the complaint.