

1. POLICY STATEMENT

genU (being Karingal St Laurence Limited and its subsidiaries) is committed to a culture of the highest ethical standards and behaviours, including promoting honesty, fairness, and openness in its relations with stakeholders such as employees, clients, contractors, and regulators.

Consistent with that commitment, the purpose of this policy is to encourage the reporting of matters which are protected disclosures under respective whistleblower laws, through appropriate channels and without fear of intimidation, disadvantage, or reprisal.

2. SCOPE

This policy applies to the KSL Group including: Karingal St Laurence Limited; IPA Personnel Services Pty Ltd and all other KSL controlled entities and all associated brands.

This policy applies to all workers.

3. DETERMINING ELIGIBLE WHISTLEBLOWER DISCLOSURES



The reporting of Reportable Behaviours is an important mechanism to assist genU to monitor and manage its risks generally as well as its ethical standards and behaviours, and compliance with its systems, policies, and the law.

Detailed information regarding the protection eligibility criteria and reporting process is contained in the Whistleblower Procedure.

This policy is accessible through a number of pathways including:

- genU intranet;
- genU website (genu.org.au);
- genU induction training undertaken by all employees of genU;
- by requesting a copy from the Whistleblower Protection Officer (*See Whistleblower Procedure Section 12.2*).

4. REVIEW AND AMENDMENT OF POLICY

genU will review this Whistleblower Policy regularly for its effectiveness, following any legislative amendments or every 3 years whichever occurs sooner. Any amendments must be approved by the genU Board of Directors.

5. RELATED DOCUMENTS

- [Whistleblower Procedure](#)
- [Whistleblower and Your Role](#)
- [Fraud and Corruption Control Policy and Procedure](#)
- [genU Code of Conduct](#)
- [Disputes and Internal Complaints Procedure](#)
- [genU Risk Appetite Statements](#)

6. LEGISLATION & RELATED REFERENCES

The Whistleblower Policy and Whistleblower Procedure complies with relevant legislation. Legislation which relates to whistleblower disclosures includes:

- Australian Securities Investment Commission Act 2001 (Cth) (ASIC Act)
- Corporations Act 2001 (Cth) (Corporations Act)
- Fair Work Act 2009 (Cth)
- Public Interest Disclosures Act 2012 (Vic)
- Public Interest Disclosure Act 2013 (Cth)
- Taxation Administration Act 1953 (Cth)

7. DEFINITIONS

Term	Definition
Worker	A person engaged by the KSL Group in any capacity including: a director; an employee; supported employee; contractor/subcontractor; employee of a contractor/ subcontractor; consultant, employee of a labour hire company; an outworker, an apprentice or trainee; a work experience student; a student on placement or a volunteer.
Risk Appetite Statement	The genU Risk Appetite Statement provides insight into the degree of risk that the genU Board is willing to accept in protecting our clients, our people, our reputation, financial sustainability, and organisational resilience. It is intended to provide guidance on how and where genU

	can take risk within the guidelines set by the Board and is underpinned by our four strategic pillars.
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8. RELATED RECORDS

Records must be maintained as per legal and contractual requirements. For guidance please refer to the [Records and Information Management Policy](#) and the [Records Retention and Disposal Schedule](#).