



Metricon Integrity Program

PURPOSE: To support the Company's commitment to the highest standards of ethical and legal conduct and to provide a means to raise concerns without the fear of repercussions regarding actual or suspected disclosable conduct.

SCOPE: Any individual who is, or has been: an officer or employee, contractor, consultant, supplier, or associate of Metricon or any of its related entities, or any relative, dependant or spouse of such individual.

DATE: January 2020

1. What is Metricon's Integrity Program?

At Metricon, we are committed to honesty, integrity, ethics and empowering our people, as well as abiding by our Code of Conduct. For cases where these standards are not upheld, we have created the Integrity Program, which is our corporate whistleblower program, to allow our people, as well as certain other disclosers, to raise concerns in a safe environment, without the fear of repercussions. Management welcomes and encourages this transparency.

2. Who does this program apply to?

An 'eligible whistleblower' is an individual who is, or has been, any of the following:

- (a) An officer or employee (e.g. current and former employees who are permanent, part-time, fixed term or temporary, interns, secondees, managers and directors);
- (b) A supplier of services or goods to Metricon (whether paid or unpaid), including their employees (e.g. current and former contractors, consultants, service providers and business partners);
- (c) an associate of Metricon; and
- (d) a relative, dependant or spouse of those individuals listed above

3. What is reportable conduct under the program?

Any conduct that the discloser has reasonable grounds to suspect is illegal, unethical, is an improper state of affairs or circumstances, or is not in line with Metricon's Code of Conduct can be reported through the program.

Before reporting, we encourage individuals to ensure, as far as possible, that reports are true, factually accurate, complete, and unbiased.

Conduct that relates to standard or personal workplace grievances is not an 'eligible disclosure' under this policy and instead, is reported to managers or to the relevant department, as follows:

- Bullying – People Advisory
- Harassment – People Advisory
- Workplace health and safety breaches – OHS/WHS
- Unfair practices - People Advisory
- Pay disputes or issues - Payroll
- Service and warranty issues – Service and Warranty team
- Customer satisfaction issues – Customer Service team



Disclosures that are not about disclosable matters do not qualify for protection under the Corporations Act (or the Taxation Administration Act, where relevant). See paragraph 7 for further detail.

4. Who can people report an ‘eligible disclosure’ to?

We encourage individuals to report internally in the first instance, to any of the following ‘eligible recipients’, who have been provided with training in, and are qualified to, handle disclosures:

- Any General Manager or Department Head
- People Advisory
- Legal
- Audit, Risk & Process Improvement

In addition to the above list, disclosures can be made to any other eligible disclosure recipient under the Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 (Cth).

5. If an individual wishes to remain anonymous, how do they make an anonymous disclosure?

A disclosure can also be made anonymously and/or confidentially, securely and outside of business hours. To facilitate this, we have engaged a dedicated, confidential, independent, third-party disclosure program provider called Stopleveline (details below). Individuals can remain fully anonymous, partly anonymous to Metricron but not to the third-party, or they can disclose their identity at any time.

Phone	1300 30 45 50 (8am – 8pm Monday to Friday)
Email	metricron@stopleveline.com.au
Website	http://metricron.stoplevelinereport.com
Mail	Metricron Homes c/o Stopleveline Pty Ltd Locked Bag 8 Hawthorn, VIC, 3122
Smartphone App	Search for “stopleveline365” or “stopleveline” in the Apple Store and Google Play

We ask that people include as much detail as possible to help us investigate their report, such as what is happening, where, how, by who etc.

6. How are reports investigated?

The investigation will be conducted objectively and fairly by Legal, and/or Internal Audit, and/or People Advisory, and/or any other external body required, with regard to the facts and circumstances of the report. The discloser will be protected at all times. Where the report is not anonymous, feedback and updates will be provided to the discloser regarding the investigation process and outcome of the report.

7. Legal protections for disclosers

A discloser qualifies for protection as a whistleblower under the Corporations Act if they are an eligible whistleblower and:



- (a) they have made a disclosure of information relating to a 'disclosable matter' directly to an 'eligible recipient' or to ASIC, APRA or another Commonwealth body prescribed by regulation;
- (b) they have made a disclosure to a legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the whistleblower protections in the Corporations Act; or
- (c) they have made an 'emergency disclosure' or 'public interest disclosure'.

Protections under the Corporations Act are:

- identity protection (confidentiality)
 - Metricon will work with the discloser to help identify any aspects of their disclosure that could inadvertently identify them.
 - Investigations will be handled by qualified individuals.
 - All documents and materials relating to the report will be stored securely, with access limited to those relevant to the investigation.
- protection from detrimental acts or omissions;
 - Access to support services where applicable
 - Relocating or reassigning the discloser, where applicable
 - Ongoing monitoring to assess any risk of detriment or omission.
- compensation and remedies; and
- civil, criminal and administrative liability protection.

Disclosers will not be disadvantaged or discriminated against in any way, as required by the law.

8. Availability and awareness of this policy

All employees are required to sign off on this policy annually through Metricon's Learning Management System via an email they receive, in addition to answering mandatory questions following the policy. Additionally, this policy is available on Metricon's employee intranet page and Metricon's website.

9. If you have questions about this policy, who should you contact?

For any questions on the program, please contact Jessica Gabai, Head of Audit, Risk & Process Improvement at Metricon, on 03 9915 5742, or at jessicagabai@metricon.com.au.

Policy Owner	Metricon Homes' Board of Directors
Related Policies, Procedures, Guidelines, Forms or Templates	Metricon Code of Conduct