WHISTLEBLOWER PROTECTION POLICY

Astron Limited

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Whistleblower Protection Policy

1. Purpose

Astron Limited and its related bodies corporate (**Astron**) is committed to upholding the highest standards of integrity, fairness and ethical conduct and recognises that a whistleblower protection program is an important element in detecting corrupt, illegal or other undesirable conduct.

Creating a supportive environment where our people feel safe to Speak Up is one of Astron's core values and underpins our workplace culture.

The Whistleblower Protection Policy (**Policy**) provides details of Astron's whistleblower protection program and outlines when and how to Speak Up and what Astron will do to protect those who Speak Up and report Potential Misconduct (defined in section 5 of this Policy).

The board of directors of Astron (**Board**) and senior management encourage Speaking Up and reporting Potential Misconduct. A failure to Speak Up exposes Astron to risks and undermines our culture and values. The Board will not tolerate anyone being discouraged from Speaking Up or being disadvantaged, oppressed or victimised because they want to Speak Up or have done so.

2. Raising Concerns at Astron

Astron is committed to a supportive workplace environment and you are encouraged to raise concerns that you may have regarding conduct occurring at Astron or in relation to Astron.

Astron has a number of formal and informal ways in which concerns can be raised depending on your circumstances and the level of seriousness of the issue. In most cases, your concerns may be able to be addressed informally, through discussions with your Leader or by talking to a Recipient. However, in some cases, you may be more comfortable making a formal report and Astron has adopted this Policy to help you with that process.

Set out below are the main ways in which you may choose to raise your concerns.

2.1 Speaking to your Leader / Informally Raising Concerns

For most issues, you will likely be comfortable discussing your concerns informally with your Leader or another trusted person within the business and Astron encourages you to continue to feel empowered to raise issues in this way. Astron is committed to the creation of a supportive workplace environment and seeks to create a culture where concerns can be discussed openly and transparently.

Accordingly, Astron encourages you to speak to your Leader or raise your concerns informally if you would prefer not to discuss your concerns with the people listed in section 6 to make a formal report under this Policy.

2.2 'Speaking Up' about Potential Misconduct under this Policy

Where you have concerns about Potential Misconduct at Astron and you are not comfortable raising your concerns informally in the ordinary course (as outlined in section 2.1 above), you are encouraged to formally report it under this Policy by Speaking Up.

2.3 Personal Work-related Grievances

Personal work-related grievances should generally be raised under Astron's Grievance Handling Policy and Procedures, as they are more effectively addressed that way and are not within the scope of this Policy. In some cases, personal work-related grievances may be covered by this Policy and attract its protections. If you are unsure if your personal work-related grievance concerns Potential Misconduct and you would like the benefit of legal protections (if available), you can report your grievance under this Policy, just in case.

3. Objective

The objective of this Policy is to:

- encourage people to Speak Up if they become aware of Potential Misconduct;
- explain how to Speak Up and what protections a Discloser will receive;
- outline the processes for responding to Speak Up disclosures; and
- promote a workplace environment in which everyone feels safe, supported and encouraged to Speak Up.

4. Scope

This Policy applies to Potential Misconduct. Anyone with information about Potential Misconduct is encouraged to Speak Up under this Policy.

The Policy applies to:

- Astron and all subsidiary and affiliate entities over which it exercises control (together, the **Group**); and
- Astron's current and past employees, officers, contractors, suppliers (including employees of suppliers), and associates, as well as these people's dependents (or their spouse's dependents) and their relatives.

Astron takes all reports of Potential Misconduct seriously. The response that Astron takes, including the investigations process that it follows and the protections that it implements, will depend on the nature and circumstances of the relevant disclosure. For example, reports of Potential Misconduct of a minor nature that can be resolved informally may not require the same level of response as disclosures about Potential Misconduct of a material nature that involves a large-scale and complex investigation. However, you should note that:

- while not all reports will necessarily lead to a formal investigation, all reports will be assessed and considered by Astron and a decision made as to whether they should be investigated (see further information in section 8); and
- Astron is committed to making sure that you do not suffer detriment because you Speak Up and, accordingly, reports will be treated confidentially and appropriate protections will be offered to you based on your circumstances, the nature of the Potential Misconduct and the people involved (see further information in section 10).

Astron will perform the obligations under this Policy applying to each member entity in the Group. For Astron's related bodies corporate outside Australia, this Policy may need to be read subject to any applicable overseas legislation.

5. Definitions

Leader means any senior manager or supervisor of Astron.

Potential Misconduct means any suspected or actual misconduct or improper state of affairs or circumstances in relation to Astron. It also means a breach of law or information that indicates a danger to the public. For further information, please see Attachment 1. Potential Misconduct does not generally include personal-work related grievances as described in section 2.3. However, you should Speak Up even if you are unsure if something is Potential Misconduct.

Examples of Potential Misconduct may include but are not limited to:

- breach of laws or regulations;
- breach of Astron's Code of Conduct or other Astron policies, standards or codes;
- criminal activity;
- bribery or corruption;
- conduct endangering health and safety or causing damage to the environment;
- dishonest or unethical behaviour;
- conflicts of interest;

- anti-competitive behaviour;
- financial fraud or mismanagement;
- insider trading;
- breach of trade sanctions or other trade controls;
- unauthorised use of Astron's confidential information;
- conduct likely to damage the financial position or reputation of Astron; and
- deliberate concealment of any of the above.

Speak Up or **Speaking Up** means telling an appropriate person in a position of influence (called Recipients, with examples provided below) if you have reasonable grounds to suspect that Potential Misconduct has occurred or is occurring in relation to Astron.

This Policy also refers to a number of key people, who are defined as follows:

Term	Meaning	Role and Responsibilities
Recipients	Those persons identified in section 6, which include: • Company Secretary, any Member of Astron's Board of Directors • A member of Astron's Executive Team	The role of the Recipients is to ensure that the information is heard by Astron and proper follow-up occurs, as well as to ensure Disclosers feel supported and protected. Recipients will refer the disclosure to the Whistleblower Investigations Officer as soon as possible to oversee Astron's response.
Whistleblower or **Discloser**	The person Speaking Up in connection to Potential Misconduct, also referred to as "you".	
Whistleblower Investigations Officer (WIO)	The Company Secretary or their appointed delegate	If a report made under this Policy is formally investigated, the WIO will carry out or supervise the investigation and report investigation outcomes.

6. How to Speak Up

If you wish to Speak Up you are encouraged to firstly report the matter internally to one of the following Recipients (as well as or instead of your Leader):

- Company Secretary, any member of Astron's Board of Directors;
- any member of Astron's Executive Team

Reports may be made via phone, email or letter and can be made anonymously and inside or outside of business hours. Contact details for the Recipients above can be accessed on the Astron SharePoint (Contacts register on the Administration homepage).

You should provide as much information as possible, including details of the Potential Misconduct, people involved, dates, locations and any more evidence that may exist.

7. Speaking Up Anonymously

You can make an anonymous disclosure if you do not want to reveal your identity.

While you are encouraged to provide your name when providing a disclosure because it will make it easier for Astron to address your disclosure (for example, the context in which you may have observed the Potential Misconduct is likely to be useful information) you are not required to do so.

If you do not provide your name, Astron will assess your disclosure in the same way as if you had revealed your identity, and any investigation will be conducted as best as possible in the circumstances. However, please be aware that an investigation may not be possible unless sufficient information is provided. You will still be entitled to protections under the law if a protected disclosure is made, as described in Attachment 1.

Information received from anyone Speaking Up will be held in the strictest of confidence. More information on protecting your identity is contained in section 10.

8. Astron's Commitment to those who Speak Up

Disclosures made under this Policy will be received and treated sensitively and seriously, and will be dealt with fairly and objectively.

While Speaking Up does not guarantee that the disclosure will be formally investigated, all reports will be assessed and considered by Astron and a decision made as to whether the disclosure qualifies as a protected disclosure and whether the disclosure should be investigated. Astron's response to a disclosure will vary depending on the nature of the disclosure (including the amount of information provided).

Any investigations commenced will be conducted in a timely manner and will be fair and independent from any persons to whom the disclosure relates.

All employees and contractors must cooperate fully with any investigations.

Unless there are confidentiality or other reasons not to do so, persons to whom the disclosure relates will be informed of the allegation at an appropriate time, and will be given a chance to respond to the allegations made against them.

Your identity will be protected as described in section 10 of this Policy.

9. What Happens after an Investigation?

The results of any investigation will be recorded in writing in a formal internal report that will be confidential and is the property of Astron. The outcome of any investigation will be reported to the Board in accordance with section 14 below.

Disclosers who Speak Up will generally be informed of the investigation outcome. However, it may not always be appropriate to provide Disclosers with this information in which case it will not be shared. Where appropriate, and to the extent permitted by law, the persons to whom the disclosure relates will also be informed of the findings of any investigation. The formal report recording the results of an investigation will not be provided to a Discloser or any other person subject to investigation.

Where an investigation identifies a breach of law, Astron's Code of Conduct or internal policies or procedures, appropriate disciplinary action may be taken. This may include but is not limited to terminating or suspending the employment or engagement of the person(s) involved in the misconduct.

10. Protection of Whistleblowers

Astron is committed to protecting and respecting the rights of a person who Speaks Up under this Policy. This section outlines the policy on protecting those who Speak Up. The law also contains additional protections, which are summarised in Attachment 1.

10.1 Protecting your identity

The priority at Astron is to protect people who Speak Up. If you Speak Up, your identity (and any information that we have because of your disclosure that someone could likely use to work out your identity) will only be disclosed if:

- you give your consent for Astron to disclose that information;
- the disclosure is allowed or required by law (for example, disclosure by Astron to a lawyer to get legal advice relating to whistleblowing laws); or

- in the case of information likely to identify you, it is reasonably necessary to disclose the information for the purposes of an investigation, but all reasonable steps are taken to prevent someone from working out your identity.

10.2 Protecting you from detriment

Astron will not tolerate any detrimental conduct against any person who has or may Speak Up or who is believed to have done so, including conduct against that person's colleagues, employer (if a contractor) or relatives. Similarly, Astron will not tolerate any threats to cause detriment.

Examples of detrimental conduct includes the following:

- discrimination, detriment or damage to a person's reputation;
- harassment, intimidation or retaliation;
- a demotion or dismissal; or
- threats of any of the above.

Detrimental conduct does not include reasonable administrative actions to protect a person from detriment or steps to manage unsatisfactory work performance consistent with Astron's performance- and conduct-management processes.

Any person involved in detrimental conduct may be subject to disciplinary action (including but not limited to termination of employment or engagement). In some circumstances, this may also be a criminal offence punishable by imprisonment. Astron may refer any person that has engaged in detrimental conduct to law enforcement authorities for further investigation.

If you are concerned that you may be, are being, or have been subject to detrimental conduct as a result of Speaking Up you should immediately report this matter to the Company Secretary or any member of the Board of Directors.

10.3 Other protections available

Astron is committed to making sure that you do not suffer detriment because you Speak Up. The protections offered will be determined by Astron and depend on things such as the Potential Misconduct and people involved. Protections may include the following, at Astron's discretion:

- monitoring and managing the behaviour of other employees;
- relocating employees (which may include the people alleged to have been involved in the Potential Misconduct) to a different office or revising the reporting lines of employees;
- offering you a leave of absence or flexible workplace arrangements while a matter is investigated;
- rectifying any detriment that you have suffered.

Astron will look for ways to support all people who Speak Up, but it will of course not be able to provide non-employees with the same type and level of support that it provides to employees. Where this Policy cannot be applied to non-employees (for example, because Astron cannot itself offer flexible workplace arrangements to a supplier), Astron will still seek to offer as much support as practicable.

11. False or Misleading Disclosures

When Speaking Up, you will be expected to have reasonable grounds to suspect the information you are disclosing is true, but you will not be penalised if the information turns out to be incorrect. However, you must not make a report that you know is not true or is misleading. Where it is found that a Discloser has knowingly made a false report, this may be a breach of Astron's Code of Conduct and will be considered a serious matter that may result in disciplinary action. There may also be legal consequences if you make a knowingly false report. If you do not have reasonable grounds to believe the information you have reported, it may also mean you do not receive any protections under whistleblowing laws.

12. Record Keeping and Personnel Files

All Speak Up disclosures will be recorded in a confidential register (**Speak Up Register**).

The Recipient (or other person receiving your disclosure) will seek your consent before recording your name on the Speak Up Register. You are encouraged to feel supported and safe in providing information, and to consent to the limited sharing within Astron of your identity. This will assist Astron to protect and support you in relation to your disclosure and facilitate Astron in investigating, reporting and taking action arising as a result of your disclosure.

The Speak Up Register is confidential and can only be accessed by the Recipients, who will use that information to determine the appropriate response to disclosures made and to inform any investigation that has commenced.

All information, documents, records and reports relating to the investigation of reported conduct will be confidentially stored and retained in an appropriate and secure manner.

13. Availability of this Policy and Training

Astron will seek to ensure that employees (including new employees) are informed about and understand this Policy. Each employee will have access to this Policy. Training will also be provided to individuals who receive whistleblowing disclosures or otherwise have a role under this Policy, including in relation to how to respond to disclosures.

A copy of this Policy will also be available on Astron 's website and SharePoint.

This Policy does not form part of any terms of employment and Astron may change, apply or withdraw this Policy in its discretion.

Any questions about this Policy can be referred to the Company Secretary.

14. Reporting and Review of this Policy and the Whistleblower Program

The Board will receive a summary of disclosures made under this Policy at least on an annual basis, including metrics on disclosures made, the types of issues raised, how matters are being investigated (if applicable), whether those disclosures have been substantiated and the outcome. The summary provided to the Board will not identify individual Disclosers.

Recipients must consider if a disclosure or information that arises in responding to a disclosure triggers processes in Astron’s Continuous Disclosure Policy. If so, that information must be dealt with by the Recipients and Astron in accordance with the Continuous Disclosure Policy.

Astron’s Whistleblower Program is to be reviewed no less frequently than every two years. The review must address the efficacy of the Whistleblowing Program. Any changes to Astron’s Whistleblower Program must be approved by the Board. In particular, within the constraints of confidentiality and any other legal restrictions, it must consider the fairness of the investigations undertaken, the actual consequences of making disclosures for people who have made reports and compliance with this Policy generally.

Attachment 1: Protections provided by Australian law

1. When Legislative Protections May Apply

Under Australian law, legislative protections for Speaking Up are available to certain persons (including current and former employees and suppliers, as well as their relatives and dependants) who make a "protected disclosure" to certain people.

Astron encourages you to Speak Up to a Recipient described under section 6 of this Policy. However, the law offers the same protections if you make a "protected disclosure" to certain other persons in some cases. Details of those persons to whom a "protected disclosure" can be made are set out below in section 2 to this Attachment.

Protections and remedies available to those who make a "protected disclosure" are set out in section 3 to this Attachment. If you make a "protected disclosure" that does not comply with the Policy, you will still be entitled to the legal protections under applicable Australian law.

Please contact Astron's Company Secretary if you would like more information about the protections or remedies available under the law.

2. Protected Disclosures

To be a "protected disclosure" information must relate to "disclosable matters" and be made to "eligible" persons or organisations. Examples of this type of information and recipients are outlined in the following table:

Information reported or disclosed	Recipient of disclosed information

• Information about misconduct, or an improper state of affairs or circumstances in relation to Astron or a related body corporate.
• Information that Astron or any officer or employee of Astron has engaged in conduct that:
  ○ contravenes or constitutes an offence against certain legislation (e.g. the Corporations Act);
  ○ represents a danger to the public or the financial system; or
  ○ constitutes an offence against any law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more.
• Note that "personal work-related grievances" are not protected disclosures under the law, subject to the exceptions referred to in this section.
	• A person authorised by Astron to receive protected disclosures – i.e. Recipients under this Policy.
	• An officer or senior manager of Astron or of a related body corporate.
	• An auditor, or a member of an audit team conducting an audit, of Astron or of a related body corporate.
	• An actuary of Astron or of a related body corporate.
	• ASIC or APRA.
	• A legal practitioner in some cases.

• Information that may assist the Commissioner of Taxation to Perform his or her functions or duties under a taxation law in relation to Astron	• Commissioner of Taxation

• Information about misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of Astron or an associate of Astron, which the employee considers may assist the eligible recipient to perform functions or duties in relation to the tax affairs of Astron or the associate.	• An auditor or a member of an audit team conducting an audit of Astron or the associate. • A registered tax agent or BAS agent who provides tax services or BAS services to Astron or the associate. • A director, secretary or senior manager of Astron or the associate. • An employee or officer of Astron, or a related body corporate of Astron, who has functions or duties that relate to the tax affairs of Astron Limited or the associate. • A legal practitioner for the purpose of obtaining legal advice or legal representation.

The law also protects certain disclosures made in "emergency" and "public interest" situations, in which case disclosures can be made to additional recipients. Please contact Astron's Company Secretary if you would like more information about emergency and public interest disclosures.

2.1 Personal Work-related Grievances

Protection for disclosures about personal work-related grievances are only available under the law in limited circumstances. A disclosure of a personal work-related grievance will remain protected if, in summary:

- it concerns detriment to you because you have or may be considering Speaking Up; or
- it is made to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the law about whistleblowers.

Under the law, a grievance is not a "personal work-related grievance" if it:

- has significant implications for an entity regulated under the law (e.g. Astron) that do not relate to the Discloser;
- concerns conduct, or alleged conduct, in contravention of specified corporate and financial services laws, or that constitutes an offence punishable by 12 months or more imprisonment under any other Commonwealth laws;
- concerns conduct that represents a danger to the public or financial system; or
- concerns conduct prescribed by the regulations.

3. Specific Protections and Remedies

The law provides protections if you make a "protected disclosure", including that:

- you are not subject to any civil, criminal or administrative liability for making the disclosure;
- no contractual or other remedy may be enforced or exercised against you on the basis of the disclosure; and
- 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.

Additional legislative protections and remedies may also be available.

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