



Whistleblower (Protected Disclosure) Policy

This policy supports CPA's mission and values

OUR VALUES

Respectful

Ethical

Passionate

Curious

Courageous

Purpose

This policy helps us to find out about actions and behaviours at CPA that are dishonest, illegal or improper. That is, it helps us to find out about wrongdoing.

Whistleblowing is about speaking up about wrongdoing. We may not find out about wrongdoing if there is no safe and secure way for people to speak up. This policy helps employees (and non-employees) to feel safe and secure in speaking up about wrongdoing. Their concerns are kept confidential and they will not be treated badly or unfairly for speaking up.

Whistleblowing is part of our governance framework. It is important so that CPA can be transparent and accountable and maintain a good reputation. It supports CPA to be sustainable and to meet legal requirements.

Policy Statement

In line with our values and [Code of Conduct](#), we:

- have high standards of conduct and ethical behaviour in our business activities
- promote and support a culture of honest and ethical behaviour
- ensure corporate compliance and good corporate governance.

We protect and support those who tell us about illegal or improper conduct that occurs within CPA. That is, we protect and support anyone who makes a disclosure about wrongdoing at CPA.

Who is this policy for?

All Officers, employees and contractors of CPA must comply with this policy.

Who is responsible for this policy?

- CPA's Protected Disclosure Coordinators are responsible for implementation of this policy
 - Chief Executive Officer
 - Company Secretary
 - General Manager, Strategy, Quality & Risk.
- Anyone who is entitled to receive a disclosure is responsible for implementation and compliance monitoring of this policy (e.g. Board Member, Company Secretary, Executive Team member or otherwise).

For further information refer to section 2 of the [Whistleblower \(Protected Disclosure\) Guidelines](#).

Policy in Action

- In line with CPA's values, this policy aims to:
 - make sure anyone who speaks up about wrongdoing can do so safely, securely and with confidence that they will be protected and supported
 - make sure disclosures of wrongdoing are dealt with appropriately and in a timely manner
 - make it clear how we receive, handle and investigate disclosures
 - encourage more disclosures of wrongdoing
 - help to prevent wrongdoing.

- The [Whistleblower \(Protected Disclosure\) Guidelines](#) explain:
 - who is entitled to protection as a whistleblower
 - the protections whistleblowers are entitled to
 - who a disclosure can be made to
 - how disclosures made by whistleblowers in line with this policy will be handled by CPA.

Definitions

(Note: The meanings of words used a lot at CPA are located in the [CPA Common Definitions](#). The words in the list below are new and are only used in this policy and the other documents that are part of this policy).

Capitalised terms used in this Policy have the following meanings:

ASIC means the Australian Securities and Investment Commission.

Associate means any individual who is:

- an associate within the meaning of the Corporations Act, or
- if the disclosure relates to CPA's tax affairs, an associate within the meaning of section 318 of the Income Tax Assessment Act 1936 (Cth).

Australian Whistleblower Laws means either or both of the regimes contained in Part 9.4AAA of the Corporations Act and Part IVD of the Taxation Administration Act 1953 (Cth).

Corporations Act means the Corporations Act 2001 (Cth).

Detriment has the meaning given in Section 4 of the Whistleblower (Protected Disclosure) Guidelines.

Misconduct has same meaning as in the Corporations Act (which includes but is not limited to fraud, negligence, default, breach of trust and breach of duty).

Officer has the same meaning as in the Corporations Act (which includes but is not limited to directors and the company secretary).

Personal Work-Related Grievance means a grievance about any matter in relation to an individual's employment or former employment which has, or tends to have, implications only for the individual personally, and where the information does not:

- a) have significant implications to CPA, or any other entity, that do not relate to the individual
- b) concern Whistleblower Detriment (see Section 4 of the Whistleblower (Protected Disclosure) Guidelines), or
- c) concern Potential Misconduct.

Policy includes CPA's Whistleblower (Protected Disclosure) Policy and Whistleblower (Protected Disclosure) Guidelines.

Potential Misconduct has the meaning given in Section 1.2 of the Whistleblower (Protected Disclosure) Guidelines.

Protected Disclosure Coordinators means the persons identified in Section 2 of the Whistleblower (Protected Disclosure) Guidelines.

Relative has the same meaning as in the Corporations Act.

Tax Affairs means affairs relating to any tax imposed by or under, or assessed or collected under, a law administered by the Australian Commissioner of Taxation.

Whistleblower means a person who is eligible for protection as a whistleblower under CPA's Whistleblower (Protected Disclosure) Policy and Guidelines, or under the Australian Whistleblower Laws.

Documents that are part of this policy

Guidelines

[Whistleblower \(Protected Disclosure\) Guidelines](#) (on CPA website)

A copy of this policy is available on our website at <https://cerebralpalsy.org.au/who-we-are/policies/>.

Related policies and further reading

Internal

[Upholding Human Rights Policy](#)

[Code of Conduct Policy](#)

[Good Working Relations Policy](#)

[Employee Resignation, Termination or Retrenchment Policy](#)

External

[ASIC Regulatory Guide 270 – Whistleblower Policies](#)

Policy Owner	General Counsel & Company Secretary
Date Approved	22/08/2025
Approval Authority	CEO
Date of Commencement	1 December 2016
Date for Next Review	September 2027
Related Legislation	Corporations Act 2001 (Cth) Taxation Administration Act 1953 (Cth) Income Tax Assessment Act 1936 (Cth)

Revision History

Please email policyfeedback@cerebralpalsy.org.au for access to past policies and/or further revision history details.

Review Date	Revision Details
30/01/23	Updated Stopline postal address in Whistleblower (Protected Disclosure) Guidelines.
13/09/23	Full review. Translated Policy to Plain English and added MoC icon and text. Removed GM SQR as Protected Disclosure Coordinator and replaced with Senior Quality Manager. No changes were made to the Guidelines.
12/09/25	Scheduled review. Minor updates to Whistleblower (Protected Disclosure) Policy and Whistleblower (Protected Disclosure) Guidelines.
14/09/26	Updated Policy and Guidelines to replace Senior Quality Manager with GM Strategy, Quality & Risk as Protected Disclosure Coordinator (while SQM is on parental leave).