

Whistleblower Policy

Purpose

AFL SportsReady is committed to maintaining the highest standards of accountability, ethical behaviour and good governance.

This Policy encourages individuals to speak up and report serious misconduct, wrongdoing or unethical behaviour that may impact AFL SportsReady, its workers, participants, host employers, stakeholders or the broader community.

AFL SportsReady is committed to ensuring that individuals who make disclosures in good faith are treated fairly, supported appropriately, and protected from victimisation, retaliation or other detrimental conduct.

This Policy establishes the framework for reporting, assessing, investigating and responding to protected disclosures and supports compliance with Australia's whistleblower protection laws.

Commitment

AFL SportsReady is committed to fostering a culture of integrity, accountability and transparency. We encourage individuals to speak up where they reasonably suspect misconduct, wrongdoing or unethical behaviour and are committed to ensuring disclosures are managed fairly, confidentially and without fear of retaliation.

Scope

This Policy applies to all workers employed across the group of AFL SportsReady companies, including AFL SportsReady Ltd, SportsReady Education Pty Ltd and The Ready Foundation Ltd, including:

- Board members
- Employees
- Contractors
- Consultants
- Labour hire workers
- Volunteers
- Students
- Apprentices
- Trainees
- Students undertaking work experience
- Former workers
- Former Board members

- Former contractors
- Suppliers and service providers
- Associates and relatives of any of the above

This Policy applies to disclosures concerning actual or suspected reportable misconduct relating to AFL SportsReady's operations, activities or personnel.

Background

AFL SportsReady recognises that creating a culture where people feel safe to raise concerns is essential to maintaining trust, accountability and organisational integrity.

The timely reporting of misconduct assists AFL SportsReady to identify and address risks, prevent harm, strengthen governance, and ensure compliance with legal and ethical obligations.

AFL SportsReady encourages individuals to raise concerns where they reasonably suspect that misconduct has occurred, is occurring, or may occur.

AFL SportsReady will take all disclosures seriously and will respond in a manner that is fair, objective, confidential and consistent with applicable legislation.

Definitions

Term	Definition
AFL SportsReady	Includes AFL SportsReady Ltd, SportsReady Education Ltd and The Ready Foundation Ltd.
Detrimental Conduct	Any retaliation, victimisation, intimidation, harassment, discrimination, disciplinary action, threats or adverse treatment because a person has made or intends to make a protected disclosure.
Eligible Whistleblower	A person who is entitled to whistleblower protections under applicable legislation and this Policy.
Investigator	An appropriately qualified person appointed to investigate a disclosure.
Protected Disclosure	A disclosure of information relating to actual or suspected reportable misconduct made in accordance with this Policy.
Protected Disclosure Officer	A person authorised to receive and manage protected disclosures under this Policy.
Reportable Misconduct	Serious misconduct, wrongdoing or improper conduct that may adversely affect AFL SportsReady or its stakeholders.

Term	Definition
Whistleblower	A person who makes a protected disclosure under this Policy.

Principles

AFL SportsReady will:

- Promote a culture where concerns can be raised without fear of retaliation.
- Encourage the reporting of suspected misconduct.
- Treat disclosures seriously and respond promptly.
- Protect whistleblowers from detrimental conduct.
- Maintain confidentiality where reasonably possible.
- Conduct investigations fairly, objectively and proportionately.
- Ensure procedural fairness to all parties.
- Support individuals involved in disclosures and investigations.
- Comply with applicable legislative obligations.
- Continuously review and improve whistleblower processes and protections.

Roles and Responsibilities

1. Board and Audit, Risk and Governance Committee

The Board and Audit, Risk and Governance Committee are responsible for:

- Providing governance oversight of the whistleblower framework.
- Monitoring significant whistleblower matters and trends.
- Reviewing the effectiveness of this Policy.
- Ensuring appropriate resources are available to support whistleblower protections.

2. Chief Executive Officer

The Chief Executive Officer is responsible for:

- Promoting compliance with this policy.
- Supporting a culture of ethical conduct and accountability.
- Ensuring disclosures are appropriately assessed and managed.
- Ensuring significant matters are escalated appropriately.

3. Protected Disclosure Officer

AFL SportsReady has appointed the Company Secretary to act as the Protected

Disclosure Officer and to receive, assess and manage protected disclosures in accordance with this Policy.

The Protected Disclosure Officer is responsible for:

- Receiving protected disclosures.
- Protecting whistleblowers from detrimental conduct.
- Coordinating the assessment and investigation of disclosures.
- Monitoring the progress of investigations.
- Maintaining appropriate records and reporting.

4. Managers

Managers are responsible for:

- Promoting awareness of this Policy.
- Escalating concerns promptly.
- Supporting workers who raise concerns.
- Cooperating with investigations.

5. Workers

All workers must:

- Report reportable misconduct where they reasonably suspect wrongdoing.
- Act honestly and in good faith.
- Cooperate with investigations where required.
- Maintain confidentiality regarding investigations and disclosures.

Policy Details

1. Reportable Misconduct

Disclosures may be made regarding actual or suspected conduct including:

- Fraud or theft.
- Corruption, bribery or dishonest conduct.
- Financial misconduct.
- Criminal activity.
- Breaches of legislation.
- Serious breaches of organisational policies.
- Misuse of organisational funds or resources.
- Unauthorised disclosure of confidential information.
- Serious conflicts of interest.
- Unsafe work practices that create significant risk.
- Child Safety breaches.
- Conduct that endangers health, safety or wellbeing.

- Conduct that causes significant harm to AFL SportsReady's reputation.
- Deliberate concealment of misconduct.
- Conduct that may constitute a serious impropriety or governance failure.

A disclosure may relate to conduct that has occurred, is occurring, or is reasonably suspected may occur.

2. Matters Not Covered by this Policy

This Policy is not intended to address ordinary workplace grievances that relate solely to an individual's personal employment circumstances.

Examples include:

- Interpersonal disagreements.
- Minor workplace conflicts.
- Performance management decisions.
- Promotion decisions.
- Salary or remuneration concerns.
- Rostering issues.
- General dissatisfaction with management.

These matters should generally be managed through AFL SportsReady's grievance resolution, workplace behaviour or people and culture processes.

However, where such matters involve serious misconduct, victimisation, retaliation, corruption, fraud or other reportable misconduct, they may also be addressed under this Policy.

3. Making a Protected Disclosure

Protected disclosures may be made verbally or in writing.

Reports should contain as much information as reasonably possible, including:

- The nature of the concern.
- Details of the alleged conduct.
- Names of individuals involved.
- Relevant dates, times and locations.
- Supporting evidence or documentation.
- Names of any witnesses.

Disclosures may be made to:

- The Chief Executive Officer.
- A Protected Disclosure Officer.
- The Chair of the Audit, Risk and Governance Committee.

- The Board Chair.
- Any other appropriately authorised recipient determined by AFL SportsReady.

Anonymous disclosures may be accepted and investigated where sufficient information is provided. However, anonymity may limit AFL SportsReady's ability to investigate a matter thoroughly or provide feedback regarding the outcome.

Eligible whistleblowers may have additional rights and protections under applicable legislation, including the [Corporations Act 2001 \(Cth\)](#). AFL SportsReady will take reasonable steps to ensure those protections are reflected in the management of disclosures made under this Policy.

Knowingly false, misleading, malicious or vexatious reports may result in disciplinary action.

4. Assessment of Disclosures

Upon receiving a disclosure, AFL SportsReady will:

- Assess whether the matter falls within the scope of this Policy.
- Determine whether immediate action is required.
- Identify any risks to individuals or the organisation.
- Determine whether external authorities should be notified.
- Determine whether a formal investigation is required.

Where appropriate, the whistleblower will be informed that the disclosure has been received and is being assessed.

5. Investigation of Disclosures

Where an investigation is required, AFL SportsReady may appoint an internal or external investigator with appropriate skills and independence.

Investigations will:

- Be conducted fairly and objectively.
- Follow principles of procedural fairness.
- Consider all relevant information available.
- Maintain confidentiality where possible.
- Be proportionate to the seriousness of the allegations.
- Be conducted within a reasonable timeframe.

Individuals who are the subject of allegations will be provided with an opportunity to respond where appropriate.

At the conclusion of an investigation, AFL SportsReady may:

- Substantiate the allegations.
- Partially substantiate the allegations.
- Determine allegations are not substantiated.
- Recommend corrective actions.
- Refer matters to external authorities.

6. Confidentiality

AFL SportsReady recognises the importance of maintaining confidentiality to protect whistleblowers and the integrity of investigations.

The identity of a whistleblower, and information likely to identify them, will only be disclosed where:

- The whistleblower consents.
- Disclosure is required or authorised by law.
- Disclosure is necessary for the effective conduct of an investigation.
- Disclosure is necessary to protect the health, safety or wellbeing of a person.

All records associated with disclosures will be stored securely and access will be restricted to authorised personnel.

Unauthorised disclosure of confidential information relating to a disclosure may result in disciplinary action.

7. Protection from Detrimental Conduct

AFL SportsReady prohibits detrimental conduct against any person because they:

- Make a protected disclosure.
- Intend to make a protected disclosure.
- Assist another person in making a disclosure.
- Participate in an investigation.

Detrimental conduct may include:

- Victimisation.
- Harassment.
- Intimidation.
- Threats.
- Discrimination.
- Disciplinary action.
- Demotion.
- Dismissal.
- Damage to reputation.
- Any other adverse treatment.

Any reports of detrimental conduct will be treated seriously and may result in disciplinary action.

8. Fair Treatment of Persons Named in a Disclosure

AFL SportsReady recognises that individuals who are the subject of disclosures are entitled to procedural fairness and reasonable support.

Where appropriate, AFL SportsReady will:

- Inform the individual of the allegations.
- Provide an opportunity to respond.
- Maintain confidentiality.
- Conduct investigations objectively.
- Avoid prejudging outcomes.

The making of a disclosure does not automatically mean that allegations are substantiated.

9. Support Available

AFL SportsReady recognises that whistleblower matters can be stressful for all parties involved.

Support may be provided to:

- Whistleblowers.
- Witnesses.
- Individuals subject to allegations.
- Managers involved in investigations.

Support may include:

- Employee Assistance Program services.
- Managerial support.
- Access to wellbeing resources.
- Referral to external support services where appropriate.

10. Privacy and Record Keeping

AFL SportsReady will maintain appropriate records relating to disclosures, investigations, findings and outcomes.

Records will be:

- Stored securely.
- Accessible only to authorised personnel.

- Retained in accordance with legislative and organisational requirements.
- Managed consistently with AFL SportsReady privacy obligations.

Information will only be disclosed where reasonably necessary to investigate, manage or respond to a disclosure.

11. Reporting to External Authorities

Nothing in this Policy prevents an individual from making a disclosure to an external authority where permitted by law.

AFL SportsReady may also refer matters to external authorities where required or appropriate, including:

- [Australian Securities and Investments Commission](#) (ASIC)
- [Australian Prudential Regulation Authority](#) (APRA)
- [Fair Work Ombudsman](#)
- Police.
- Child protection authorities.
- Workplace safety regulators.

Breaches of Policy

Failure to comply with this Policy may result in corrective or disciplinary action, including:

- Informal counselling.
- Formal warnings.
- Removal from certain duties.
- Termination of employment or engagement.
- Referral to external authorities where appropriate.

Any person who engages in detrimental conduct against a whistleblower may be subject to disciplinary action.

Related Policies and Documents

- Employee Code of Conduct
- Intellectual Property Policy
- Privacy and Confidentiality Policy
- Respectful Workplace Policy
- Work Health, Safety and Wellbeing Policy
- Risk Management Framework
- [Corporations Act 2001 \(Cth\)](#)

Policy Review Details

This Policy will be reviewed every two (2) years, or earlier where legislative or organisational changes require.

Version	Effective	Review Approved By	Next Review
1.0	October 2026	AFL SportsReady Chief Executive Officer	October 2028