

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. DETERMINING ELIGIBLE WHISTLEBLOWER DISCLOSURES



The reporting of alleged 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](#)).

genU will ensure the policy and procedure are communicated monthly to aged care workers and responsible persons.

3. REVIEW AND AMENDMENT OF POLICY

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

4. RELATED DOCUMENTS

- [Whistleblower Procedure](#)
- [Code of Conduct](#)
- [Disputes and Internal Complaints Procedure](#)
- [Complaints, Appeals and Feedback Foundational Policy and Procedure](#)
- [Risk Appetite Statements](#)

5. LEGISLATION & RELATED REFERENCES

The Whistleblower Policy and [Whistleblower Procedure](#) comply with relevant legislation. Legislation which relates to whistleblower disclosures includes:

- [Australian Securities Investment Commission Act 2001 \(Cth\) \(ASIC Act\)](#)
- [Aged Care Act 2024 \(Cth\)](#) and [Aged Care Rules 2025 \(Cth\)](#)
- [Corporations Act 2001 \(Cth\) \(Corporations Act\)](#)
- [Fair Work Act 2009 \(Cth\)](#)
- [Public Interest Disclosures Act 2012 \(Vic\)](#)
- [Public Interest Disclosures 2022 \(NSW\)](#)
- [Public Interest Disclosure Act 2010 \(Qld\)](#)
- [Public Interest Disclosure Act 2003 \(WA\)](#)
- [Public Interest Disclosure Act 2018 \(SA\)](#)
- [Public Interest Disclosure Act 2002 \(Tas\)](#)
- [Public Interest Disclosure Act 2021 \(ACT\)](#)
- [Public Interest Disclosure Act 2008 \(NT\)](#)
- [Public Interest Disclosure Act 2013 \(Cth\)](#)
- [Taxation Administration Act 1953 \(Cth\)](#)

6. 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](#).