



Whistleblower Policy

March 2015

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Prepared by: Human Resources / Compliance Departments
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1 Purpose

The objective of the Policy is to provide an open working environment in which employees and contractors are able to report instances of unethical, unlawful, or undesirable conduct without fear of intimidation or reprisal.

2 Field of Application

This document is applicable to directors, employees and contractors (including employees of contractors) of Penske Power Systems Pty Ltd (PPS).

3 Background

PPS' Code of Ethical Conduct and policies generally have been developed to ensure high standards of conduct and ethical behaviour in all of our business activities. The Whistleblower Policy has been adopted to ensure that persons can raise concerns regarding actual or suspected breaches of the Code of Ethical Conduct and/or our legal/policy standards generally, without fear of retribution or intimidation.

4 Definitions

Term	Definition
PPS	Penske Power Systems Pty Ltd and its subsidiaries
Unacceptable Conduct	Actual or suspected conduct includes <ul style="list-style-type: none"> • Conduct or practices which are illegal or breach any law • Breaches of PPS' Code of Ethical Conduct or any other policies • Harassment • Corrupt activities • Theft, fraud or misappropriation • Substantial mismanagement of PPS' resources • Conduct which involves substantial risk to public health, safety or the environment or the health and safety of PPS' employees and contractors • Any action taken against or harm suffered by a person as a result of making a report under this policy
Persons	Directors, employees and contractors (including employees of contractors) of PPS

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5 Reporting Concerns

Persons are encouraged and have a responsibility to report matters or behaviours that they honestly believe are “Unacceptable Conduct”.

In the first instance a person is encouraged to report any known or suspected instances of “Unacceptable Conduct” to their immediate manager or a senior manager in their Branch or Department.

PPS recognises that there will be situations for instance where:

- Issues may be of a sensitive nature where a person is not comfortable discussing it with their direct manager;
- Their direct manager is believed to be involved in the unacceptable conduct matter, or they consider the matter they have raised has not been adequately addressed; or
- The relevant manager(s) are not considered to be sufficiently impartial to deal with the issue.

In these situations you should report the matter to the General Manager - Human Resources, the Risk & Compliance Manager or the CFO.

In instances where you do not wish to raise the matter internally, you can report the matter to PPS' Integrity Hotline established with external service provider, Expolink. Your details will remain confidential and not be disclosed to PPS management without your permission.

Reports can be received by the Integrity Hotline 24 hours a day all year round. Any calls made to the Integrity Hotline are not recorded. The operators taking the call on this hotline are not associated with PPS. They are trained and experienced specialists dedicated to dealing with whistleblowers and their concerns. Whistleblowers will be provided with a confidential reference number by the operator. Once a communication is made to the Integrity Hotline, Expolink prepares a written report that is then forwarded to the Executive Vice President of Penske Transportation Group International Pty Ltd (the parent company of PPS), the General Manager – Human Resources and the Risk & Compliance Manager.

If a person reports a matter either internally or externally they can identify themselves or remain anonymous.

A person proposing to make a report of concerns should ensure there is a reasonable basis for the report.

Whistle blowing is about reporting actual or suspected “Unacceptable Conduct” and should be made in good faith. A report found to be malicious, deliberately misleading, or frivolous will result in disciplinary action.

5.1 Form of reporting

A report can be made in person, by telephone, email or via the online website.

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5.2 Contact Details

Position	Incumbent/Location	Phone	Email
General Manager – Human Resources	Ken Newman, PPS Chipping Norton	02 9794 2684	KNewman@penskeps.com
CFO	John Zappia, PPS Chipping Norton	02 9794 2600	JZappia@penskeps.com
Risk & Compliance Manager	Michael Ross, PPS Chipping Norton	02 9794 2796	MRoss@penskeps.com
External service provider	Expolink	1800 121 889 (Australia) 0800 443 816 (New Zealand)	http://expolink.co.uk/whistleblowing/submit-a-report/ Access code: "PCV"

6 Investigation of Concerns

When a matter is reported to the General Manager - Human Resources, the Risk & Compliance Manager or PPS' external service provider; the President & CEO and the Chief Financial Officer (CFO) will be notified. In the event the report concerns a member of the PPS' Executive, the Board of Directors will also be notified.

A senior PPS manager will be requested to investigate the matter and report back to the President & CEO and CFO (and Board of Directors where applicable) who in turn will determine the necessary action to be taken arising from the investigation. The Whistleblower will be briefed on the outcome of the investigation.

For more serious or sensitive notifications, the President & CEO and/or CFO may appoint external auditors to investigate the matter.

7 Confidentiality

A person's identity and the fact they have reported concerns will be kept confidential and no details will be maintained on the person's employee records. Information about a person's identity will only be released with the consent of the person who has reported the concerns.

Investigation reports will only be made available to those persons actively involved in the investigation and the President & CEO and CFO and, if the nature of the matter requires, PPS' legal counsel.

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8 Rights of Whistleblowers

PPS is committed to protecting and respecting the rights of any person who reports unacceptable conduct in good faith. A person will not be discriminated against or disadvantaged in their employment with PPS for making a report in accordance with this policy nor subject to reprisals. PPS will take all reasonable steps to ensure adequate and appropriate protection whether the matter is proven or not.

9 Records

The Risk & Compliance Manager will retain a record of Whistleblower Reports and a summary of Whistleblower notifications will be provided to the Audit & Finance Committee.

10 Applicable Documents

Document	Location
Code of Ethical Conduct (COR01.002)	Resources > Business Documentation > Corporate > Compliance Policies
Independence and Conflicts of Interest Policy (COR01.011)	Resources > Business Documentation > Corporate > Compliance Policies

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Document Control

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Valid from	March 2015	
Issued by	Compliance Department	
Approved by	x	x
	Rob Sisk President and CEO	John Zappia CFO

Amendments

Please Note:

- The issue of an update invalidates the previous issue;
- The currently valid version of the policy can be accessed on the intranet;
- Hard copy print-outs are not covered by any subsequent amendments;
- Always verify that the version is current before using the information contained therein.