



Whistleblower Policy

Policy

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Whistleblower Policy

1 Introduction

The Code of Conduct, policies and procedures of Penske Commercial Vehicles Pty Ltd and its subsidiaries (collectively referred to as “PCV”) have been developed to ensure high standards of conduct and ethical behaviour in all of our business activities within Australia and New Zealand. The PCV Executive Management Team and the Board are committed to preventing and detecting deviations from PCV’s Code of Conduct, policies and procedures and preventing illegal and other undesirable conduct within our business. To assist in detecting deviations, PCV has implemented a fully independent Whistleblower service called the Integrity Hotline that is managed by Expolink.

This Whistleblower Policy (“Policy”) has been adopted to ensure that employees and stakeholders can raise concerns regarding actual or suspected contravention of PCV’s Code of Conduct, policies and procedures and non-adherence to applicable laws and regulations without fear of reprisal or retaliation. A report may be made anonymously if you wish.

This Policy aims to:

- Encourage employees and stakeholders to report an issue if they genuinely believe someone has contravened PCV’s Code of Conduct, policies or the law;
- Highlight that PCV takes these matters seriously and will investigate all reported misconduct or unethical behaviour; and
- Assist in ensuring that serious misconduct or unethical behaviour is identified and appropriate action taken if the allegations are found to be correct.

2 Field of Application

This Policy applies to all directors, employees, and contractors of PCV, whether full time, part time or casual, at any level of seniority wherever employed.

3 Definitions

Term	Definition
PCV	Penske Commercial Vehicles Pty Ltd (PCV) and its related subsidiaries in Australia and New Zealand.

4 What sort of concerns should be reported?

You are encouraged to report any matters or behaviours that you genuinely and sincerely believe contravene PCV’s policies or the law. For the purposes of making a report under this Policy, matters may include any actual or suspected:

- Conduct or practices which are illegal or breach any law;
- Breach of any of PCV’s Code of Conduct, policies and procedures;
- Corrupt activities;
- Theft, fraud or misappropriation;
- Significant mismanagement or waste of funds or resources;
- Abuse of authority;

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- Serious harm to public health, safety or environment or the health and safety of any person in the PCV workplace; or
- Action taken against, or harm suffered by a person as a result of making a report under this Policy.

5 Who can you talk to?

If you become aware of any matter or behaviour you think contravenes PCV's Code of Conduct, policies and procedures or the law, then you should:

- Take the matter up with your immediate supervisor or manager;
- Report the matter to a more senior manager; or
- Report the matter to the Legal Department, Tanya Myint on +61 7 3271 9379.

Should you not feel comfortable discussing the matter with the people identified above or if you do not believe it would be appropriate given the circumstances of the wrongdoing, you are encouraged to utilise our Integrity Hotline service that can be contacted by:

- A toll free telephone call: Australia – 1800 121 889, New Zealand – 0800 443 816; or
- Accessing the Expolink website at the URL: <http://expolink.co.uk/whistleblowing/submit-a-report/> using the access code "PCV".

6 What happens after a report is made?

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 PCV. 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 President and Executive Vice President of Penske Transportation Group International Pty Ltd, the immediate parent company of PCV and a representative of the Human Resources Department within Penske Automotive Group, Inc ("PAG").

Investigation processes will vary depending on the precise nature of the conduct being investigated. All investigations will be conducted in a manner that is fair and objective to all people involved. For example, a report will not be investigated by someone who is implicated in the matter reported.

If requested by the person making a report, feedback will be provided by Expolink to the person about the outcome of the investigation. The report given by Expolink to the company will not contain any information regarding the provider's details unless the person providing the information has expressly given their consent to do so.

Your identity and the fact that you have made a report and the contents of the report will be kept confidential and no details of your participation in this process will be included in your personnel file or performance review. The report will not be disclosed to anyone except those that are actively involved in investigating the matters raised in the report. A summary of reports, including outcomes, will be provided to PCV's Compliance and Risk Review Board on a

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quarterly basis. All reported investigations will only be closed following sign-off from the Executive Vice President of Human Resources for PAG.

7 What happens to you as a Whistleblower?

You will not be discriminated against or disadvantaged in your employment with PCV for making a report in accordance with this Policy, nor will you receive reprisals due to your actions in making a report. PCV will take all reasonable steps to ensure that adequate and appropriate protection is being provided for those who, in good faith, make a report. This protection applies if the matter is proven or not, regardless of whether it is reported to an external authority.

Whistleblowing is not about airing a grievance. It is about reporting real or perceived malpractice. A report may damage the career prospects and reputation of people who are the subject of serious allegations and therefore if your report is not made in good faith or is found to be malicious, deliberately misleading or frivolous, you may be subject to disciplinary action.

8 Access to this Policy

This Policy will be available at all operations for display on common notice boards, with an information poster and available for viewing by any employee or stakeholder of PCV on the PCV intranet.

9 Process

This policy will be reviewed annually and updated as required from Managing Director.

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Document Control

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Valid from	March 2017	
Issued by	Legal Department	
Approved by	x	x
	Tanya Myint Head of Legal	John DiSalvo Executive Vice President

Amendments

Please Note:

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