WHISTLEBLOWER POLICY

Purpose

Australian Institute of Business (AIB) is committed to the highest standards of conduct and ethical behaviour in all of our business activities, and to promoting and supporting a culture of honest and ethical behaviour, compliance and strong corporate governance.

Part of this commitment is having a robust process to detect and investigate any suspected unethical, illegal, corrupt, fraudulent, or other undesirable conduct involving AIB. AIB encourages the reporting of matters of concern and will ensure people feel safe to speak up without fear of disadvantage or victimisation.

This policy and corresponding procedure will be made publicly available on the AIB website.

This policy supplements any other policies applicable to AIB.

Scope

This policy applies to the confidential reporting by all AIB Staff, Students, Candidates and other stakeholders of suspected Wrongdoing by AIB including, Officers and Staff.

Definitions

Unless otherwise defined in this document, all capitalised terms are defined in the glossary.

Eligible Whistleblowers are individuals as defined as:

a. an Officer, employee, or contractor of AIB;
b. a current, former or prospective student or candidate of AIB;
c. current or former suppliers of services or goods to AIB (whether paid or unpaid) including their employees;
d. associates of AIB which means an individual with whom AIB acts in concert or has some form of business or governance relationship; or
e. a relative, dependant or spouse of any of the above individuals.

Officer: in the context of AIB and this policy and procedure, the definition of 'Officer' is as per Section 9AD (3) (c) of the *Corporations Act "…a person (i) who makes , or participates in making, decisions that affect the whole or substantial part, of the business of the entity; or (ii) who has the capacity to affect significantly the entity's financial standing."* This means a Director, the CEO or a member of the Senior Management Group.

Whistleblower: Anyone who informs about potential Wrongdoing relating to an organisation.

Whistleblower Officer: in the first instance, this is the AIB Chief Executive Officer (CEO) but where the CEO is the focus of a disclosure, the Chair of the AIB Board of Directors will assume the role with respect to the outlined procedure – please see Section 3 of the Whistleblower Procedure.

***Wrongdoing**:* Means conduct or behaviour that includes, but is not limited to:

- breach of laws or regulations;
- criminal activity including theft, illicit drug use or sale, violence, or property damage;
- offering or accepting a bribe;
- dishonest, corrupt or unethical behaviour;
- conflicts of interest;
- anti-competitive behaviour;
- financial irregularities or fraud, money laundering or mismanagement including in relation to AIB's tax affairs – including attempts to defraud AIB or its staff, students or candidates, or its contractors or suppliers;
- falsifying financial or corporate reporting;
- insider trading;
- unauthorised use of AIB's confidential information;
- improper use of personal information as defined in the AIB Privacy Policy and Procedure;
- improper use of AIB's physical or intellectual property;
- conduct endangering health and safety or causing damage to the environment;
- sexual misconduct including gender-based violence;
- discrimination;
- victimisation;
- deliberate concealment of any Wrongdoing as per the above categories,
- and any other any serious improper, unethical, or potentially criminal conduct not covered by the above categories.

Policy

1. AIB believes that:

    1.1. Wrongdoing presents risks and that action is required to both rectify and prevent recurrence.

    1.2. Wrongdoing should be identified and reported in good faith by persons who work within or with the organisation.

    1.3. Processes for reporting Wrongdoing need to be accessible, timely, and able to protect the discloser; AIB has zero tolerance for retaliatory or detrimental conduct.

    1.4. The desire of any Whistleblower to report Wrongdoing anonymously is reasonable and should be respected.

    1.5. Disclosures by Whistleblowers should be protected, even if they are found to be incorrect.

    1.6. Whistleblowers should be kept informed of the progress of investigations and final outcomes.

    1.7. Training may be required to ensure staff are aware of responsibilities and obligations relating to whistleblowing, and

1.8. Additional protections are required to protect those who act as Whistleblowers for Wrongdoing related to the conduct of AIB directors or Officers.

1.9. Persons mentioned in a Whistleblower's disclosures and/or suspected of misdoings are entitled to fair treatment and procedural fairness.

2. AIB will:

2.1. Provide accessible, confidential, and supportive mechanisms for the reporting of alleged Wrongdoing:

(a) so that Whistleblowers feel they can come forward to make a disclosure about Wrongdoing, with confidence that AIB will take appropriate action, and

(b) to ensure that there are no adverse consequences when making a Whistleblower complaint.

2.2. Keep confidential, where appropriate, the identity of a Whistleblower and other confidential information disclosed in the course of the Whistleblower's disclosure.

2.3. Afford Eligible Whistleblowers any additional specific protections afforded them under any specific legislation (including, but not limited to protections afforded by the *Corporations Act*, the *Taxation Administration Act,* and the *Competition & Consumer Act 2010* (Cth).

2.4. Conduct investigations of disclosures in a discreet, fair, independent and objective manner.

2.5. Liaise with external parties during investigations as appropriate/as legally obliged.

2.6. Ensure appropriate remediation steps are undertaken in the event an allegation is substantiated.

2.7. Notify, as appropriate, relevant authorities of Wrongdoing (and, specifically, if there are mandatory reporting requirements in place for conduct, the subject of the Wrongdoing, to undertake that mandatory reporting).

2.8. Comply with its legal obligations relating to any relevant legislation.

2.9. Review the Whistleblower Policy and Procedure regularly to ensure ongoing effectiveness and compliance with relevant legislation.

Related Policies and Procedures:

Whistleblower Procedure
Academic Freedom and Free Intellectual Inquiry Policy
Academic Integrity Policy and Procedure
Compliance with Law Policy and Procedure (internal)
Privacy Policy and Procedure
Record Management Policy and Procedure
Research and Scholarship Policy and Procedure
Staff Code of Conduct (internal)

Related Legislation:
Corporations Act 2001 (*Corporations Act*)
Fair Work Act 2009
Privacy Act 1988
Taxation Administration Act 1953 (Taxation Administration Act)
Competition & Consumer Act, 2010 (Cth)
Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019
Higher Education Standards Framework (Threshold Standards) 2021

External References:
Australian Securities and Investment Commission [ASIC], 2019, *Regulatory Guide 270: Whistleblower Policies*, viewed, 13 November 2025, https://download.asic.gov.au/media/5702691/rg270-published-13-november-2019-20200727.pdf
BPP Institute, *Whistleblower Policy*, viewed 13 November 2025, https://cic.vic.edu.au/wp-content/uploads/pol-052-whistleblower-policy.pdf

Responsibility:
Chief Executive Officer

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