

Overview

At Line Security Services Ltd

("the Company") we are guided by our company values. These values are the foundation of how we conduct ourselves and interact with each other, our clients, members, suppliers, and other stakeholders. The Company is committed to ensuring corporate compliance and promoting ethical corporate culture by observing the highest standards of fair dealing, honesty, and integrity in our business activities.

Purpose

The policy has been put in place to ensure any concerns raised regarding any misconduct or improper state of affairs or circumstances in relation to the Company's business are dealt with effectively, securely, appropriately, and in accordance with the Corporations Act 2001 (the Act). The Company encourages the reporting of any instances of suspected unethical, illegal, corrupt, fraudulent, or undesirable conduct involving the Company's business and provides protections and measures to individuals who make a disclosure in relation to such conduct without fear of victimization or reprisal.

This policy will be provided to all employees and officers of the Company upon commencement of the employment or engagement.

The Company will train employees during their induction to ensure ongoing education regarding the application of the policy.

Scope

This policy applies to any person who is, or has been, any of the following with respect to the Company:

- Employee.
- Director.
- contractor (including sub-contractors and employees of contractors); Supplier (including employees of suppliers).
- Consultant; Auditor

Reportable Conduct

You may make a report or disclosure under this policy if you have reasonable grounds to believe that a Company director, employee, contractor, supplier, consultant, or other person who has business dealings with the Company has engaged in conduct (Reportable Conduct) which is:

1. Dishonest, fraudulent or corrupt; Illegal (such as theft, dealing in or use of illicit drugs, violence or threatened violence and criminal damage to property);
2. Unethical including any breach of the Company's policies such as the Code of Conduct; Oppressive or grossly negligent.
3. Potentially damaging to the Company, its employees or a third party; Misconduct or an improper state of affairs.

4. A danger or represents a danger to the public or financial system; Harassment, discrimination, victimization or bullying.

Any disclosures that do not fall within the definition of Reportable Conduct, will not qualify for protection under the Act. It will be at the Company's discretion whether it considers there is a reasonable suspicion that the Reportable Conduct is occurring and/or whether the conduct constitutes "misconduct or improper state of affairs" under the Act.

Personal work-related grievances should be reported to managing director or in accordance with the Company's Grievance Policy.

Making a Disclosure

The Company relies on its employees maintaining a culture of honest and ethical behaviour. Accordingly, if you become aware of any Reportable Conduct, it is expected that you will make a disclosure under this policy. There are several ways in which you may report or disclose any issue or behaviour which you consider to be Reportable Conduct.

Internal Reporting

You may disclose any Reportable Conduct to the managing director, you can make a disclosure outside of business hours by contacting the managing director via email.

You are also encouraged to contact the managing director to obtain any additional information you may require before making a disclosure or for any clarification regarding this policy.

If you are unable to use any of the above reporting channels, a disclosure can be made to an "eligible recipient" within the Company.

Eligible recipients include:

1. Operation manager
2. Office manager
3. Auditor or member of an audit team conducting an audit of the Company.

Anonymity

When making a disclosure, you may do so anonymously. It may be difficult for the Company to properly investigate the matters disclosed if a report is submitted anonymously and therefore the Company encourages you to share your identity when making a disclosure, however you are not required to do so.

Reporting to Regulators

You may also make a disclosure to the Security industry Authority (SIA) in relation to a Reportable Conduct. You will be covered by the protections outlined in this policy if you have reported your concerns to SIA or relevant bodies.

Reporting to a Legal Practitioner

You may choose to discuss your concerns with a legal practitioner for the purposes of obtaining legal advice or representation. You will be covered by the protections outlined in this policy if you have reported your concerns to a legal practitioner.

Whistle-blower Policy

Public Interest and Emergency Disclosure

In certain situations, the conduct or wrongdoing may be of such gravity and urgency that disclosure to the media or a parliamentarian is necessary.

1. A public interest and emergency disclosure can only be made to a journalist, defined to mean a person who is working in a professional capacity as a journalist for a newspaper, magazine, or radio or television broadcasting service
2. A Member of the Parliament of the Commonwealth or of a State or Territory parliament.

Investigation

The Company will investigate all matters reported under this policy as soon as practicable after the matter has been reported. The managing director will investigate the matter and where necessary, appoint an external investigator to assist in conducting the investigation.

All investigations will be conducted in a fair, independent, and timely manner and all reasonable efforts will be made to preserve confidentiality during the investigation.

If the report is not anonymous, the managing director or external investigator will contact you, by your preferred method of communication to discuss the investigation process and any other matters that are relevant to the investigation.

Where you have chosen to remain anonymous, your identity will not be disclosed to the investigator or to any other person and the Company will conduct the investigation based on the information provided to it. Where possible, the managing Director provide you with feedback on the progress and expected timeframes of the investigation.

The person against whom any allegations have been made will also be informed of the concerns and will be provided with an opportunity to respond (unless there are any restrictions or other reasonable bases for not doing so).

To the extent permitted by law, the managing director may inform you and/or a person against whom allegations have been made of the findings. The Company will document the findings in a report however any report will remain the property of the Company and will only be shared with you or any person against whom the allegations have been made if the Company deems it appropriate.

Protection of Whistle-blowers

The Company is committed to ensuring that any person who makes a disclosure is treated fairly and does not suffer detriment and that confidentiality is preserved in respect of all matters raised under this policy.

Protection from Legal Action

You will not be subject to any civil, criminal, or administrative legal action (including disciplinary action) for making a disclosure under this policy or participating in any investigation.

Any information you provide will not be admissible in any criminal or civil proceedings other than for proceedings in respect of the falsity of the information.

Protection of Confidentiality

Whistle-blower Policy

All information received from you will be treated confidentially and sensitively. You will not be required to provide your name when making a disclosure.

To make a disclosure on an anonymous basis, it is recommended that you use a pseudonym and contact the Managing director in the manner outlined above. If you report on an anonymous basis, you will still qualify for the protections in this policy.

If you make a disclosure under this policy, your identity (or any information which would likely to identify you) will only be shared if:

1. You give your consent to share that information.
2. The disclosure is allowed or required by law (for example where the concern is raised with a lawyer for the purposes of obtaining legal advice).

Where it is necessary to disclose information for the effective investigation of the matter, and this is likely to lead to your identification, all reasonable steps will be taken to reduce the risk that you will be identified. For example, all personal information or reference to you witnessing an event will be redacted from any report, you will be referred to in a gender-

If you are concerned that your identity has been disclosed in relation to a disclosure, and without your consent, you should inform the managing director or eligible recipient immediately.

Other matters

Any breach of this policy will be taken seriously and may result in disciplinary action, up to and including termination of employment. In so far as this policy imposes any obligations on the Company, those obligations are not contractual and do not give rise to any contractual rights. To the extent that this policy describes benefits and entitlements for employees, they are discretionary in nature and are also not intended to be contractual.

The terms and conditions of employment that are intended to be contractual are set out in an employee's written employment contract. The Company may unilaterally introduce, vary, remove, or replace this policy at any time.

Employees are encouraged to read this policy in conjunction with other relevant Company policies, including Code of Conduct Grievance Policy.



Hafiz Rehman
Managing Director
27/10/2025