



## Whistleblower Policy

### 1. Introduction

Pure Hydrogen Corporation Limited (Pure or the Company) 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, corporate compliance and good corporate governance.

The Company encourages the reporting of any instances of unethical, illegal, fraudulent or undesirable conduct involving the Company's businesses and will ensure that those persons who make a report shall do so without fear of intimidation, disadvantage or reprisal.

### 2. What is Reportable Conduct

2.1 You may make a report under this Whistleblower Policy (Policy) if you believe that a company director, officer, employee, contractor, supplier or other person who has business dealings with the Company has engaged in conduct (Reportable Conduct) which:

- is dishonest, fraudulent or corrupt activity, including bribery;
- is illegal activity (such as theft, drug sale or use, violence, harassment or intimidation, criminal damage to property or other breaches of state or federal law);
- is unethical or in breach of the Company's policies (such as dishonestly altering company records or data, or willfully breaching the Company's Code of Conduct or other policies or procedures);
- is potentially damaging to the Company, a Company employee or a third party, such as unsafe work practices, environmental damage, health risks or abuse of the Company property or resources;
- a breach of an officer's duties to the Company in relation to financial management;
- providing false or misleading information in a document;
- amounts to an abuse of authority;
- may cause financial loss to the Company or damage its reputation or be otherwise detrimental to the Company's interests;
- involves harassment, discrimination, victimisation or bullying; or
- involves any other kind of serious impropriety.



## 2.2 However, things that would NOT be included in Reportable Conduct:

- complaints about the level of service received from the Company or a particular official;
- a difference of opinion about a policy adopted by the Company;
- employment disputes with your employer;
- an interpersonal conflict between the discloser and another employee;
- disagreeing with the decision of the Company to donate to a particular cause.

## 2.3 Out of scope – complaints and grievances

From time to time you may have a Complaint in relation to service levels, policy decisions, or an employment-related grievance with another person within the Company, which is not Reportable Conduct or a breach of the Company's rules or policies. If you have complaint about a service issue or policy decision or you wish to raise a grievance issue, refer to the Company's Grievances Policy or speak to your direct supervisor, or the relevant committee.

## 3. Who can I make a report to?

3.1 Pure Hydrogen has a number of channels for making a report if a person becomes aware of any issue or behaviour which he or she considers to be Reportable Conduct:

a) *Your designed official/manager or committee:*

Pure Hydrogen employees or contractors may raise the matter with your designed official/manager. The manager in receipt of a report must take the matter to the Protected Disclosure Officer (as below) or executive within the Company in accordance with the protocols regarding confidentiality set out in clause 5.

If you do not wish to raise the matter with your designed official/manager, you should consider raising the matter with the relevant committee so they can assist you in relation to your matter.

Pure Hydrogen employees or contractors working within Pure Hydrogen may also report directly to a Protected Disclosure Officer, as outlined below:

b) *Any person may make a report to the following Protected Disclosure Officer:*

*Mr Ron Hollands (Company Secretary) at [newhollandservices@hotmail.com](mailto:newhollandservices@hotmail.com) or +61(0)419 239 695*



## 4. Investigation of Reportable Conduct

- 4.1 Pure Hydrogen will investigate all matters reported under this Policy as soon as possible after the matter has been reported. A Protected Disclosure Officer may appoint a person to assist in the investigation of a matter raised. Where appropriate, the Company will provide feedback to the whistleblower regarding the investigation's progress and/or outcome (subject to considerations of the privacy of those against whom allegations are made).
- 4.2 The investigation will be conducted in an objective and fair manner, and otherwise as is reasonable and appropriate having regard to the nature of the Reportable Conduct and the circumstances.

## 5. Protection of Whistleblowers

5.1 Pure Hydrogen is committed to ensuring confidentiality in respect of all matters raised under this Policy, and that those who make a report in good faith are treated fairly and do not suffer any disadvantage.

a) *Protection of your identity and confidentiality*

Subject to compliance with legal requirements, upon receiving a report under this Policy, the Company will not disclose any particulars that would suggest or reveal your identity as a whistleblower, without first obtaining your consent.

Any disclosure that you consent to will be disclosed on a strictly confidential basis.

b) *Protection of files and records*

All files and records created from an investigation will be retained under strict security and unauthorised release of information to someone not involved in the investigation (other than senior managers or directors who need to know to take appropriate action, or for corporate governance purposes) without your consent as a whistleblower will be a breach of this Policy.

Whistleblowers are assured that a release of information in breach of this Policy will be regarded as a serious matter and will be dealt with under the Company's disciplinary procedures.

c) *Fairness*

An employee or contractor within a Pure Hydrogen team who is subjected to detrimental treatment as a result of making a report in good faith under this Policy should inform the Company Secretary immediately. If the matter is not remedied, it should be raised in accordance with clause 3 of this policy.



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Disciplinary treatment includes dismissal, demotion, harassment, discrimination, disciplinary action, bias, threats or other unfavourable treatment connected with making a report.

d) *Anonymity*

Anonymous reports of wrongdoing are accepted under this Policy. Anonymous reports may have significant limitations that inhibit a proper and appropriate inquiry or investigation. These limitations may include the inability to provide feedback on the outcome and/or to gather additional particulars to assist the inquiry/investigation.

## 6. Duties in relation to Reportable Conduct

It is expected that employees or contractors of the Company who become aware of known, or potential cases of Reportable Conduct will make a report under this policy or under other applicable policies.

## 7. Reporting Procedures

- 7.1 Protected Disclosure Officers will report to the Board on the number and type of whistleblower incident reports annually, to enable the Company to address any issues.
- 7.2 These reports will be made on a 'no names' basis, maintaining the confidentiality of matters raised under this Policy. The Board will receive copies of all whistleblower reports, and whistleblower reports from Protected Disclosure Officers (as appropriate). In addition, serious and/or material Reportable Conduct will be considered by the Protected Disclosure Officers for immediate referral to the Chairman of the Board.

**Scott Brown**  
Managing Director/Chief Executive Officer

**Reviewed December 2021**  
**Next Review December 2023**