



Whistleblower Policy

Beam Communications Holdings Limited Policy No. 07

**Date of Adoption: 28 May 2015,
amended 15 June 2016,
amended 3 February 2017,
amended 22 November 2018 (company name change).**

Beam Communications Holdings Limited

Whistleblower Policy

1. Introduction

- (a) Beam Communications Holdings Limited (**Company**) is committed to excellence in quality of products and services, openness to ideas and concerns, honesty and accountability of all who make the Company successful.
- (b) In an effort to achieve this commitment, the Company seeks to establish a policy that complies with applicable laws and practices including *AS 8004-2003 (Whistleblower Protection Programs for Entities)* to encourage reporting of reportable conduct as defined below.
- (c) The purpose of this policy is to put a confidential and secure mechanism in place to protect employees against conduct such as dishonesty or fraud, while assisting the Company in achieving its commitment to excellence. The Company's commitment "to a culture of corporate compliance and ethical behaviour" is seen as a benefit to everyone who has contact with the Company including employees, directors, shareholders and customers.

2. Reportable Conduct

A director, manager, employee or contractor of the Company should report the following conduct (**reportable conduct**) when observed by that person acting in good faith:

- (a) dishonesty;
- (b) fraud;
- (c) corruption;
- (d) illegal acts including theft, drug sale or use, violence or threatened violence and criminal damage against property;
- (e) breaches of Commonwealth or State legislation or local authority by-laws (e.g. *Corporations Act, Trade Practices Act or Income Tax Assessment Act*);
- (f) unethical conduct;
- (g) serious improper conduct;
- (h) unsafe work practices; or
- (i) any other conduct which may cause financial or non-financial loss to the Company or be otherwise detrimental to the interest of the Company.

3. Reporting Procedure

- (a) A director, manager, employee or contractor of the Company who wishes to make a report in connection with reportable conduct should contact the Company's Chairman, Simon Wallace who is appointed the "Whistleblower Protection Officer" on +61 404 824 796 or in writing sent to Beam Communications Holdings Limited, 5/8 Anzed Court, Mulgrave, Victoria 3170. Alternatively contact can be made with any of the following:

Carl Hung, Non-executive director, on +852 2407 3761,

Grillo Higgins, the Company's lawyers, on +61 3 8621 8880,

Cummings Flavel McCormack, the Company's accounting advisers, on +61 3 9252 0800,

RSM Australia, the Company's auditors, on +61 3 9286 8000.
- (b) Reports made to any of the above persons may be anonymous.
- (c) The Company is committed to ensuring that the Whistleblower Protection Officer is appropriately qualified for this role and is accessible to all staff.
- (d) All persons making reports should be sure of the truth of their concerns before reporting the conduct. All reports will be kept confidential and secure within the law. However, if anonymity during the investigation cannot be maintained, a person may request relocation or a leave of absence.
- (e) Investigation of the report will include locating evidence, which may necessitate a request for more information from the person who made the report. The Company will provide a person who has made a report with feedback on the investigation into the reportable conduct and protection from retaliation. Those persons are assured that making the report will not personally disadvantage them by dismissal, demotion, any form of harassment, discrimination or current or future bias.
- (f) Should a person who has reported some reportable conduct believe that they have experienced any such disadvantage; they have an automatic right of appeal to The Magistrates Court in Victoria, Australia.

4. Investigation Procedures

All reports of reportable conduct will be the subject of thorough investigation by the Whistleblower Investigations Officer "with the objective of locating evidence that either substantiates or refutes the claims made in the report".

Best practices will be followed by the Whistleblower Investigations Officer who will be fair and independent of the person who made the report, the business team concerned or the person who is the subject of the reportable conduct.

The investigation will include the following steps:

1. Full details of the allegations will be obtained;
2. The person against whom the allegation is made will be informed;
3. Involvement of external parties such as the auditor or police will be considered by the CEO or Chairman as appropriate;
4. Allegations will be fully investigated;

5. The CEO or Chairman will decide on what action is to be taken; and
6. The person who made the report will be kept informed of the progress made during the investigation.

Where the CEO or the Chairman decides that the allegations are very serious, external investigators will be engaged.

The Company is committed to rectifying any wrongdoing verified by the investigation to the extent practicable in all the circumstances. All verifiable corruption and compliance failures will be dealt with appropriately.

The identity or any information that could lead to the identity of a person who has made a report will not be released to any person who is not involved in the investigation or resolution of the matter.

5. Abuse of Reporting Process

Abuse of the confidential reporting process will not be tolerated. Maliciously reporting unfounded allegations will be treated as a serious breach of the Company's Code of Conduct. All reports made under the confidential reporting process must be made in good faith.

6. Monitoring and Awareness

The Company will monitor and review this policy regularly to assess its effectiveness in encouraging the reporting of reportable conduct, protection of persons making reports, investigating fairly and effectively and rectifying verified wrong doing. This monitoring will be facilitated by reports to the Board that will not compromise confidentiality.

Education regarding this policy will be conducted on a regular basis and will include practical advice on how to avoid corrupt practices, the importance of this policy and the Company's Code of Conduct.