



WHISTLEBLOWER GUIDELINES

Whistleblower Guidelines

1. Purpose

- 1.1 The Tennis Whistleblower Policy (**Policy**) details the protections available to whistleblowers under the Policy and at law.
- 1.2 These Whistleblower Guidelines (**Guidelines**) support the Policy and provide further detail and guidance on how the Policy will be implemented in practice.
- 1.3 For the avoidance of doubt (and unless the context otherwise requires), terms in these Guidelines which are capitalised and defined in the Policy have the same meaning in these Guidelines.

2. Protections afforded to whistleblowers

Identity Protection

- 2.1 The Policy details that a Whistleblower's identity will be treated confidentially and will be protected from identification.
- 2.2 Below are the measures and/or mechanisms that may be implemented by the Tennis Australia Integrity and Compliance Unit to protect a Whistleblower's identity:
 - (a) Elements of the Disclosure which identify the Whistleblower's personal information will be redacted;
 - (b) the Whistleblower will be referred to in a gender-neutral context;
 - (c) where possible, the Whistleblower will be contacted to help identify certain aspects of their Disclosure that could inadvertently identify them;

Record keeping

- (d) all paper and electronic documents and other materials relating to the Disclosure will be stored securely;
 - (e) access to all information relating to a Disclosure will be limited to those directly involved in managing and investigating the Disclosure; and
 - (f) each person who is involved in handling and investigating a disclosure will be reminded about the confidentiality requirements, including that an unauthorised disclosure of a Whistleblower's identity may be a criminal offence.
- 2.3 It is also noted that anonymous disclosures that are covered by the Corporations Act can still be protected under the Corporations Act.

Suffering Detriment

- 2.4 The following measures and mechanisms may be put in place to protect Whistleblowers from suffering Detriment (where applicable):
- (a) support services (including counselling or other professional services) may be made available to Whistleblowers;
 - (b) strategies will be considered to help a Whistleblower minimise and manage stress, time or performance impacts, or other challenges resulting from the Disclosure or its investigation;
 - (c) consideration will be given as to whether measures can be put in place to minimise the risk of Detriment—for example, the Whistleblower may be allowed to perform their duties from another location or make other modifications to their workplace; and/or
 - (d) management will be made aware of their responsibilities to maintain the confidentiality of a Disclosure.

3. Investigating Disclosures

- 3.1 When a disclosure is received by the Tennis Australia Integrity and Compliance Unit, it will initially assess whether the disclosure qualifies for protection under the Corporations Act and/or the *Tennis Whistleblower Policy*. The Tennis Australia Integrity and Compliance Unit will also determine whether a formal, in depth investigation is required.
- 3.2 If an in depth investigation is required, the Tennis Australia Integrity and Compliance Unit will determine:
- (a) the nature and scope of the investigation;
 - (b) the person(s) within and/or outside the entity that should lead the investigation;
 - (c) the nature of any technical, financial or legal advice that may be required to support the investigation; and
 - (d) the timeframe for the investigation.
- 3.3 Investigations will be conducted objectively and fairly.
- 3.4 If the Whistleblower can be contacted, the Tennis Australia Integrity and Compliance Unit will provide the Whistleblower with updates on the progress of the investigation. The frequency and timeframe of updates will vary depending on the nature of the Disclosure and investigation.

4. Reporting the outcomes of a Disclosure

- 4.1 The findings from an investigation will be documented and reported to the relevant ATO and/or Tennis Australia, while still preserving confidentiality as required.
- 4.2 The method for documenting and reporting the findings will depend on the nature of the Disclosure.
- 4.3 Whilst the outcomes of an investigation may be reported to the Whistleblower, there may be circumstances where it may not be appropriate to provide those details to the Whistleblower (i.e. the disclosure relates to information that a discloser has previously been told privately and in confidence).

Version Control

Version Number:	1
Effective Date:	1 January 2020 <i>Note: These Guidelines were adopted in response to the Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 that requires companies to have an updated and compliant Whistleblower policy in place by 1 January 2020.</i>

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