

## Fairtrade Australia & New Zealand Whistleblowing Policy

### 1. Purpose

At Fairtrade Australia & New Zealand (Fairtrade ANZ), we are committed to maintaining high standards of integrity and accountability. This policy ensures that concerns about misconduct, unethical behaviour, or safeguarding breaches can be reported safely and addressed transparently. We prioritise a supportive environment where good faith reporting is valued and protected.

This policy is intended to:

- provide a framework for the safe environment through which you can voice a concern or make an allegation in good faith without fear of reprisal or unfair treatment; and
- encourage persons associated with Fairtrade ANZ or its work to report suspected or actual occurrence(s) of illegal, unethical, safeguarding breaches or inappropriate events (conduct or practices) through fair, protective and easily accessible procedures without retribution or threat of retribution.

### 2. Related Policies

- Anti-Fraud and Anti-Corruption Policy
- Complaints Handling Policy
- Control of Funds Policy
- Counter-Terrorism Policy
- Gender Equity Policy
- Non-Development Policy
- Privacy Policy
- Protection from Sexual Exploitation, Abuse and Harassment Policy
- Protection of Child and Vulnerable Adult Policy

### 3. Related Legislation

#### Australia

- Treasury Laws Amendment (Enhancing Whistleblower Protections) Bill 2018
- Corporations Act 2001
- Fair Work Act 2009
- Fair Work Regulations 2009
- Public Interest Disclosure Act 2013

#### New Zealand

- New Zealand Bill of Rights 1990
- Employment Relations Act 2000
- Privacy Act 2020
- Protected Disclosures (Protection of Whistleblowers) Act 2022

## 4. Scope

This policy applies to:

- All personnel and associates of Fairtrade ANZ, including permanent, fixed term and casual employees, contractors, interns, volunteers and Board and Committee members; and
- Relatives, dependants and spouses of Fairtrade Employees
- Implementing partners, donors and responsible parties engaged/contracted Fairtrade ANZ for a project or activities (“implementing partners”)

It covers:

- Child safeguarding incident reporting
- Child-friendly complaints handling
- Reporting and managing concerns or allegations, including sanctions for breaches
- Compliance with relevant legislation, privacy, and reporting obligations

## 5. Definitions

**Eligible Recipient:** the following persons within Fairtrade ANZ to whom a Whistleblowing report may be directed:

- an employee’s direct supervisor;
- any member of the Fairtrade ANZ Leadership Team, including the CEO; and
- the officers of Fairtrade ANZ, including the Directors and Company Secretary
- Any current or former employee of Fairtrade ANZ

**What qualifies as a disclosable matter:** Actions or activities that go against our values or interests of Fairtrade ANZ or of the public, including (but not limited to):

- Any unlawful act whether criminal/ civil, including breach of law/regulation, contract or negligence
- Abuse of authority or unequal power relations
- Breach of financial policies and processes, including misappropriation of company funds/assets, fraud or suspected fraud or deficiencies in internal control and check or deliberate error in preparations of financial statements or misrepresentation of financial reports
- Breach of, or failure to implement or comply with, Fairtrade ANZ Policies
- Manipulation of company data/records
- Disclosure of confidential/propriety information
- Bullying, discrimination, sexual harassment, exploitation or abuse
- Use of the forced child labour and forced adult labour, including bonded labour and trafficked labour
- Retaliation or victimisation following the report of any suspected misconduct
- Other unethical conduct or breaches in the Fairtrade Code of Conduct, the ACFID Code of Conduct or the CID Code of Conduct

**What doesn’t qualify as a disclosable matter:** Actions and activities which don’t go against the values and interests of Fairtrade ANZ, including but not limited to:

- An interpersonal conflict between you and another employee
- Complaints about a decision relating to your terms and conditions of engagement, or to your engagement, transfer or promotion
- Complaints on a decision to suspend or terminate your engagement, or otherwise to discipline you

**Whistleblower:** A person, who reports (suspected or actual) wrongdoing, including suspicion of misconduct in accordance with this Policy.

**Whistleblowing:** a report by a Whistleblower of suspected or actual misconduct. Whistleblowing does not include general complaints that do not relate to misconduct, for example:

- Cases of general discontent and dissatisfaction with Fairtrade ANZ or its services
- Questions regarding operational procedures, processes etc.
- Questions regarding the validity or interpretation of specific compliance guidelines or rules of procedure
- Staff job performance matters or interpersonal conflicts

These matters can be raised in accordance with Fairtrade ANZ's Complaints Handling Policy.

## 6. Policy

- Any person (the Whistleblower) must promptly report suspected or actual Misconduct to an Eligible Recipient.
- The Whistleblower will be protected from victimization, retaliation or retribution for a report of suspected Misconduct that is provided in good faith in accordance with this Policy.
- A Whistleblower who makes a report that is not done in good faith may be subject to discipline, including termination of employment, appointment or contract, or other legal means to protect the interests of Fairtrade ANZ.
- Anyone who victimises or retaliates against a Whistleblower for making a Whistleblowing disclosure in good faith will be subject to discipline, including termination of employment, appointment or contract.
- Supervisors are urged to create and enable a culture of open and safe communication and to listen actively to concerns. Supervisors must prevent discrimination against or threats to their staff or any person acting on behalf of the Fairtrade ANZ or associated with Fairtrade ANZ's work.
- Serious crimes against persons or property, such as assault, rape, burglary, etc, shall immediately be reported to local law enforcement personnel or other relevant agencies where appropriate and applicable.
- Employees or any other persons who receive a Whistleblowing disclosure must promptly and safely act to implement an investigation of the alleged Misconduct and/or to resolve the issue in accordance with this policy.
- The identity of the Whistleblower, if known, and any information provided or received as part of the investigation of a Whistleblowing disclosure shall remain confidential and shall only be disclosed to those persons directly involved in investigating the alleged Misconduct the subject of the Whistleblowing disclosure.
- Any person who is the subject of a Whistleblowing disclosure will be afforded the right to procedural fairness in the investigation of the allegation of Misconduct.

## 7. Reporting a Suspicion

### *Internal Reporting*

A person (Whistleblower) who, in the course of or in connection with their duties, discovers that serious irregularities or Misconduct may have occurred or may be occurring, are obliged to report this discovery to an Eligible Recipient as soon as possible. The Eligible Recipient may be a trusted external party and the whistleblower need not go through their employer first.

The Whistleblower can select one of the following methods, or another method to notify an Eligible Recipient of alleged Misconduct:

Email with subject line: Confidential Whistleblower Report to:

- Chief Executive Officer: [senthil@fairtrade.com.au](mailto:senthil@fairtrade.com.au)
- Chair of the Board [chair@fairtrade.com.au](mailto:chair@fairtrade.com.au)
- Post a letter to:

In Australia:

Private and Confidential  
Whistleblower Protection  
Fairtrade ANZ  
160 Johnston Street, Fitzroy, VIC 3065

In New Zealand:

Private and Confidential  
Whistleblower Protection  
Fairtrade ANZ  
PO Box 33 1587, Takapuna, Auckland 0740

Where possible Whistleblowing reports should be provided in writing, however verbal information may be provided to a Fairtrade ANZ representative who will then complete the written process. Farmers may make a verbal or written submission to their Association representative, or higher member, to represent them to Fairtrade ANZ.

If the Whistleblower is uncomfortable or otherwise reluctant to report to his/her supervisor, then the Whistleblower may report the allegation or event to the next highest or another level of management, including to the CEO or a Board committee or member.

The Whistleblower can report the event with his/her identity or anonymously. However, Whistleblowers are encouraged to put their name to the allegation whenever possible. Otherwise, it will be difficult to protect the Whistleblower and give feedback.

### **External reporting**

Whilst internal reporting is encouraged in the first instance, if the Misconduct relates to allegation of serious breach of the law, you may bypass the internal reporting system and make a report directly to the relevant authorities. The protection to the Whistleblower will still apply in these circumstances so long as the report was made in good faith.

Complaints regarding breaches of the ACFID Code of Conduct can be made to the ACFID Code of Conduct Committee. For information on the ACFID Code of Conduct and how to make a complaint, see the ACFID website: [www.acfid.asn.au](http://www.acfid.asn.au).

Complaints regarding breaches of the CID Code of Conduct can be made to the CID Code of Conduct Committee. For information on the CID Code of Conduct and how to make a complaint, see the CID website: [www.cid.org.nz](http://www.cid.org.nz)

Further to using ACFID and CID, whistleblowers can contact NZ The State Services Commission in accordance with the *Protected Disclosure Act 2000* in New Zealand.

## **8. Data Protection and Confidentiality**

- All Whistleblowing disclosures, regardless if these are true or not, have the potential to damage the reputation of the subject, the Whistleblower and / or third parties as well as Fairtrade ANZ. Therefore, all information will be treated confidentially.
- Only persons directly involved in the investigation of the Whistleblowing disclosure will be provided with the Whistleblowers name (if known) and information regarding the alleged Misconduct.
- Any written Whistleblowing disclosures and Whistleblowing investigation reports will be stored in a secure location to maintain confidentiality of the records.

## 9. Document Control

This Policy is available in the shared Fairtrade ANZ drive for all employees and is available on our website.

A copy of this policy will be provided to any person or organisation on request.

## 10. Monitoring and Review

- Complaints are logged and reviewed regularly to identify systemic issues.
- This policy is reviewed every 3 years to ensure effectiveness and compliance.

## 11. For More Information

For more information or assistance, contact us at:

- Australia: [info@fairtrade.com.au](mailto:info@fairtrade.com.au)
- New Zealand: [info@fairtrade.org.nz](mailto:info@fairtrade.org.nz)

Document version	Changes	Date approved by Board	Review Date
1.2		March 2020	March 2023
2.0	Revised whole policy to simplify language and processes Included chair's email as non-personal emails	February 2025	February 2025