Whistleblower Policy

1. Introduction

Trellis Oceania Foundation Ltd and Trellis Hope Ltd (hereafter referred to as Trellis) are registered not-for-profit charities, limited by guarantee. This Whistleblower Policy has been developed because Trellis strives to always operate in a respectful manner that recognises God's gracious authority over all life, along with the responsibility He places upon us to love, care for and protect one another in all aspects of our lives including the conduct of Trellis activities. As such, we endeavour to act as an organisation in such ways that are honest, fair and just, being open to correction and quickly making any needed adjustments. However, where such ways of working have failed, whistleblowing is welcomed and can help protect Trellis, along with its related entities, from significant legal, financial, cultural and reputational risks. Unreported misconduct can impact trust of our members, financial and prayer supporters, employees, volunteers and all Trellis related parties.

2. Purpose

This policy expresses God's love and care for all people, both inside and outside of Trellis, and ensures compliance with the Australian Securities and Investments Commission (ASIC) and Australian Charities and Not-for-profits Commission (ACNC) governance standards and the whistleblower protection elements of the Corporations Act 2001 where these apply to Trellis.

This policy will be made available to volunteers and employees at the time of their induction with Trellis and will be available on respective Trellis websites.

3. Policy Statement

Trellis and their related entities are committed to the highest ethical standards in the conduct of all its operations and relationships. Trellis is therefore committed to developing a Christian culture of love, care, honesty and integrity, establishing sound corporate governance and eliminating misconduct where it occurs.

As followers of Christ, we are to speak truthfully and lovingly without intimidation or manipulation even when confrontation or correction is required. God is for those who speak truth even when it is difficult to do so.

The objective of this policy is to encourage the reporting of wrongdoing that is of legitimate concern by providing a convenient and safe way of reporting with protection for people who make disclosures of serious wrongdoing.

This whistleblower policy will help:

- promote God's love and care for others
- provide suitable protection for individuals who disclose alleged wrongdoing
- clarify how Trellis handles disclosures of alleged wrongdoing
- deter wrongdoing; and
- provide better compliance with the law and encourage a more ethical culture.

4. Scope

This policy applies to the Trellis Boards, personnel including staff, field members and volunteers. It extends to suppliers, contractors, consultants, service providers (their employees and subcontractors) and to all those who have a partnership relationship with Trellis.

In the context of Trellis being an organisation that endeavours to operate in ways that are honest, fair and just, being open to correction and quickly making any needed adjustments, this policy is to be followed in reporting any instances of behaviour which is alleged to be unethical, illegal, fraudulent or undesirable.

5. Definitions

Terms used in this policy are:

- Whistleblowing – The act of disclosing actual or suspected wrongdoing or misconduct within Trellis. Whistleblowing does not include matters of personal grievances or workplace complaints and concerns which would usually be resolved through normal grievance and dispute resolution processes.
- Whistleblower – A person who reports known or reasonably suspected wrongdoing or misconduct within Trellis.
- Wrongdoing/Misconduct – An act or omission that involves a breach of law, Trellis policy, or generally recognised principles of ethics.

6. Roles and Responsibilities

Every person associated with Trellis has a role and responsibility in ensuring Trellis are run ethically and in accordance with our Christian values, and its rules, policies and the laws of Australia. Where matters related to alleged breaches or wrongdoing are identified they should be raised as soon as possible. In instances where a person has concerns about making such a report, reports can be made anonymously.

The Trellis Boards are ultimately responsible for this whistleblower policy, as part of its broader risk management and corporate governance commitments. The Trellis Boards will therefore ensure that the root causes and/or emerging risks highlighted by such disclosures are suitably addressed.

Whistleblower

- Protection is available to whistleblowers who disclose alleged wrongdoing that is serious in nature; made in good faith; and made with reasonable grounds to believe it is true.
- Protection is not available where the alleged disclosure is vexatious in nature with insufficient substance. This will be treated in the same manner as a false report and may itself constitute wrongdoing.
- A whistleblower must provide written information to assist any inquiry or investigation of the alleged wrongdoing so disclosed. If they are unable to do this alone, it would be reasonable to seek a support person to assist. If the whistleblower does not share their identity i.e. opts to remain anonymous, Trellis or the authority to whom the alleged misconduct is reported will assess the concern in the same way as if they had revealed their identity. However, there may be some practical limitations in conducting the investigation.

Whistleblower Protection and Disclosure Investigation

- The Trellis CEO and/or the Trellis Boards Chair are authorised to receive the whistleblower alleged disclosures. Based on their assessment of the alleged disclosure, they will offer to support and provide protection to the whistleblower according to this policy.

7. Reporting and Investigation

In summary, the steps for reporting and investigating an alleged misconduct are:

- Resolve the matter through standard Trellis internal arrangements and relationships.
- Where the above is not possible, contact the Trellis CEO or Board Chairperson, providing the details of the alleged misconduct in writing.
- The Trellis CEO or Trellis Boards Chair will arrange an appropriate investigation.

- The whistleblower will be kept informed, privacy will be maintained, and people will be supported.
- External authorities will be involved when and where required.
- There will be a written conclusion to the investigation.
- The whistleblower will be informed of that conclusion to the extent that is permissible.
- Where the alleged misconduct cannot be raised with a Trellis responsible person, the whistleblower may approach ASIC, the Australian Prudential Regulation Authority (APRA), or their lawyer.

What follows describes these steps in further detail.

It is the preference of Trellis that any alleged misconduct is resolved through internal Trellis arrangements. However, if the alleged misconduct cannot be raised with the responsible Trellis people, the whistleblower may approach ASIC, APRA, or their lawyer.

The Trellis CEO and/or the Trellis Boards Chair will either investigate the alleged disclosure or appoint an alternate suitable person, who may be either internal or external to Trellis. The investigation will be conducted independent of Trellis leadership in the area affected by the alleged wrongdoing disclosure and may seek the advice of internal or external experts as required.

The Trellis CEO and/or the Trellis Boards Chair will keep the whistleblower informed of the progress and outcomes of the investigation subject to considerations for the privacy of those against whom an alleged disclosure has been made. After reasonable assessment, they must be satisfied that all investigations are appropriate to the circumstances, carried out expressing God's love, care and support for all those involved, and conducted in a manner that is procedurally fair, confidential, timely and without bias.

Any information provided to Trellis or an external body as referred to in this policy may be used in the assessment of an investigation or in ascertaining appropriate action.

When a matter of alleged misconduct is reported, the whistleblower should provide as much written information as possible. Information such as dates, times, location, individuals involved, other witnesses, the alleged wrongdoing, physical evidence (e.g. documents, images) and any other general information that may be helpful to assist Trellis to determine how to take appropriate action.

If Trellis or the external authority to which the alleged matter was reported determines that it should be investigated, the investigation should be conducted in line with this policy and without jeopardising any legal proceedings that may result.

Where required by Australian law, or at the discretion of Trellis leadership, the authorities or other regulatory authorities will be informed as soon as practicable regarding the relevant details of the wrongdoing exposed.

The investigation will conclude with a written report from the authorised investigator(s) on the allegations so reported. The written report will include findings on the allegations and a summary of the evidence on which the findings were based. With due consideration for confidentiality and to the extent permitted under applicable laws, the Trellis CEO and/or Trellis Boards Chair will inform the whistleblower and/or the person(s) against whom allegations were made, of the findings.

8. Whistleblower Protection

Trellis is committed to protecting and respecting the rights of whistleblowers who report alleged wrongdoing in good faith.

Trellis will take reasonable precautions to store any records relating to a report of wrongdoing securely and to restrict access to authorised persons only. Unauthorised disclosure of information that could prejudice confidentiality and identify a whistleblower will be regarded seriously and may result in disciplinary action.

Trellis strictly prohibits all forms of detrimental conduct against whistleblowers and those people who are involved in an investigation of a whistleblower disclosure, in response to their involvement in that investigation.

The whistleblower and the person(s) subject to a related investigation will have access to support and assistance as provided in this policy. Any concerns that the authorised investigator has not adequately addressed the reported misconduct or that this policy has not been suitably followed, the whistleblower may escalate the matter directly to the Trellis Boards Chair, where the Chair is not investigating the disclosure. Alternatively, the whistleblower may refer their concerns to the Trellis CEO or externally to ASIC, APRA or their lawyer as appropriate.

Trellis may not be able to provide the same practical support to non-employees/non-volunteers or other associated parties that it provides to current employees/volunteers or relationships present at the time of reporting. Therefore, the processes in this policy will be adapted and applied to the extent reasonably possible.

It is important to understand that if a person reports a matter of alleged wrongdoing, they are not exempt from the consequences of their own misconduct.

9. Contact Details

Trellis Boards Chair – trellischair@gmail.com

Trellis CEO – trellisceo@gmail.com

REVISION HISTORY		
Date	**Authority**	**Action Taken**
19 November 2025	**Trellis Boards**	**Periodic Review**
14 January 2025	**Trellis Boards**	**Clarify Trellis direct accountability**
21 June 2024	**Trellis Boards**	**Authorise initial Policy release**
NEXT REVIEW: PRIOR TO 30 JUNE 2028		