

IDT OPEN DOOR POLICY

1. Introduction

This Open Door Policy is in place to ensure all staff members can raise concerns regarding actual or suspected contravention of our ethical, regulatory and legal standards as well as behaviours without fear of reprisal or feeling threatened by doing so.

This Policy aims to:

- encourage people to report any issue if they genuinely believe someone has contravened IDT's policies or the law
- assist in ensuring that serious misconduct or unethical behaviour is identified and dealt with appropriately
- provide a mechanism for confidential reporting of issues and concerns
- outline how IDT will properly deal with all reported misconduct or unethical behaviour.

The intention of this Open Door policy is not about airing grievances. It's about reporting real or perceived malpractice which has the potential to damage IDT or the company's staff members.

Any disclosure made within the framework of this policy must be made with reasonable grounds for suspecting misconduct or a contravention and must also be made with the intention to rectify the underlying issue.

2. Who does this Policy apply to?

This Policy applies to all employees and officers of IDT, whether full time, part time or casual at any level of seniority. This policy also applies to former employees and officers, as well as contractors and relatives or dependents of such people.

3. What sort of Concerns should be reported?

All employees are encouraged to report any matter or behaviour they honestly believe contravene company policy, Quality principles or the law. For the purposes of making a report under this Policy, matters may include, but are not limited to, any actual or suspected:

- conduct or practices which are illegal or breach any law
- breach of any of IDT's policies
- corrupt activities
- threat to data integrity principles
- theft, fraud or misappropriation
- significant mismanagement or waste of funds or resources
- abuse of authority
- discriminatory practices
- serious harm or potential harm to public health, safety or environment or in relation to the health, safety and wellbeing of any employee; or
- any action taken against, or harm suffered by an employee as a result of making report under this Policy.

4. Who can you talk to?

If you become aware of any matter or behaviour you think may contravene IDT's Code of Conduct, policies, Quality principles or the law, then you should:

- discuss with your immediate supervisor or manager
- report the matter to a more senior manager, the CEO, Company Secretary or Head of People and Change; or
- report the matter to the Company Chair or Chair of Audit and Risk Committee.

Staff members or any other person who may have concerns are urged to raise and discuss any matters, even if they prefer such discussions to be held on an informal basis.

Whilst the company would prefer concerns raised within the framework of this policy to be made to employees or officers of the company, a report may be made directly to relevant authorities such as ASIC, Australian Federal Police or the EPA. A report could also be made to the company's auditor.

A person who makes a report may be protected under the *Corporations Act 2001* (the Corporations Act). Guidance on the rights and obligation of a person making a report as well as the way ASIC protects that person is located at:
<https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/guidance-for-whistleblowers/>

5. What happens after a report is made?

We will investigate all reported concerns appropriately and will, where applicable, provide feedback regarding the investigation's outcome. We will take the necessary course of action in response to a report and if no action is taken we will give you an explanation.

Your identity and the fact that you have made a report and the contents of the report will be kept confidential and no details of your participation in this process will be included in your personnel file or performance review. The report will not be disclosed to anyone except those that are actively involved in investigating the matters raised in the report.

No person making a report under this policy will be discriminated against or disadvantaged in their employment with IDT, nor receive reprisals due to actions in making a report. IDT will take all reasonable steps to ensure that adequate and appropriate protection is provided for those who, in good faith, make a report. This protection applies if the matter is proven or not.

6. Access to this Policy

This Policy will be available for viewing on IDT's website.