



Speak Up Procedure

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Overview

At Pacific National, our vision is to be Australia’s most trusted and respected logistics partner. We believe that achieving this vision requires honesty, integrity, respect, and ethical and responsible decision-making.

Our Speak Up Procedure (‘this Procedure’) outlines **how employees can raise concerns** related to our workplace and sets out the **avenues for resolving** work-related issues.

Having a culture of speaking up is essential in fostering our Pacific National Approach (‘PNA’), values and “care more” philosophy. It demonstrates the courage and integrity to do what is right, helps prevent mistakes and eliminate misconduct, and encourages curiosity to improve our ways of working. We want our people to feel safe sharing concerns, reporting misconduct, and addressing potential ethical violations.

This Procedure applies universally across all of Pacific National. It is not limited to the workplace or specific working hours but extends to various settings, including working off-site at customers and supplier sites, working from home, out of hours work interactions and work functions, using social media and other online platforms where there is a connection to work, or any instances where you represent Pacific National, such as when wearing our company uniform or attire.

This Procedures applies to all employees, officers and directors, and any contractors and consultants who perform work for Pacific National. It also reflects the expectations of our customers, suppliers, shareholders, and the community.

This Procedure supersedes all previous policies related to grievance resolution.

For employees engaged under an industrial instrument (such as an Enterprise Agreement) and where the dispute or grievance resolution provisions vary in that industrial instrument, the provisions of that industrial instrument will prevail over this Procedure.

Where the matter is deemed to be a Whistleblower Disclosure, the provisions of the company’s Whistleblower Policy will prevail over this Procedure. For work health and safety matters, the provisions of the company’s Safety Issue Resolution Procedure (in accordance with the Work Health Safety Regulations 2011) will prevail over this Procedure.



Procedure

1. What is speaking up

We are committed to upholding honesty, integrity, and respect, while prioritising ethical and responsible decision-making in all aspects of our business and operations. Sometimes, we encounter behaviours or situations that fall short of our expected standards of behaviour. If this happens, Pacific National encourages you to use this Procedure to raise these concerns.

1.1 What speaking up means

Speaking up means telling an appropriate person when there are reasonable grounds to suspect, potential or actual, **inappropriate or improper behaviour or conduct related to Pacific National**, that may cause concern, distress, or harm.

At Pacific National this may include, but is not limited to, conduct or behaviour that:

- does not align with our PNA;
- is a breach of our Code of Conduct, Respect at Pacific National policy, our other policies, or the law;
- does not demonstrate our commitment to safety, or is in breach of our health, safety or environmental policies, procedures, or fails to carry out reasonable directions;
- prevents us from having a safe and respectful workplace, both physically and psychologically, including any form of harassment, discrimination, bullying or victimisation;
- is unprofessional, may cause damage to Pacific National (our reputation, customers, suppliers, or employees), or does not foster the trust, confidence, or goodwill of our customers;
- does not respect and protect our assets and resources from waste, damage or misuse, non-authorized access, and security breaches;
- does not reflect our ethical and legal standards, such as undisclosed conflicts of interest, giving or receiving authorised gifts or benefits, or acting outside of delegated authorities;
- reflects inappropriate or unauthorised collection, storage, use, or disclosure of confidential or sensitive information;
- is detrimental against a person who has raised a concern or assisted someone to speak up; or
- is reportable conduct, amounting to misconduct or improper circumstances in accordance with our Whistleblower Policy, including but not limited to illegal, dishonest, fraudulent, corrupt, or unethical conduct, serious breaches of our policies, or conduct that may cause serious harm.

Speaking up may also include seeking advice and **support to resolve a personal work-related grievance**, such as conflicts with colleagues or issues relating to employment decisions, through discussion with your direct leader (or indirect leader or People & Culture representative where more appropriate).

1.2 What makes a 'Whistleblower Disclosure'

It is important to understand the distinction between making a whistleblower disclosure and raising other types of concerns or grievances. A whistleblower disclosure is made by an eligible person to an eligible recipient, which raises a concern about "reportable conduct" occurring at Pacific National.

Reportable conduct may include (but is not limited to) misconduct, breaches of the law, serious or systematic policy breaches, negligent acts, or risks to public safety.

Where a concern has been raised, Pacific National will take measures to ensure disclosers are protected in accordance with whistleblower protection legislation. The confidentiality of an eligible whistleblower who raises the concern will be protected to the fullest extent possible, shared only as permitted by the discloser or by law. Eligible whistleblowers will also be protected from detriment caused because they raised or plan to raise a concern.

Personal work-related grievances are different from whistleblower disclosures and should be treated in line with this Procedure, unless they involve reportable conduct, have serious implications for Pacific National, or involve a retaliation against a person who made a whistleblower disclosure.

Pacific National has a specific [Whistleblower Policy](#) which details the key elements of a whistleblower disclosure including each of what an eligible person, eligible recipient and reportable conduct means. If you think your concern may be reportable conduct, refer to the process under the Whistleblower Policy.

1.3 What does speaking up mean for a work health and safety (WHS) concern?

You are encouraged to speak up when there are reasonable grounds to suspect any form of, potential or actual, inappropriate, or improper behaviour or conduct. This includes raising concerns related to WHS.

Pacific National has a specific [Safety Issue Resolution Procedure](#). If you think your concern may be a WHS matter, refer to the Safety Issue Resolution Procedure. WHS matters are raised and managed in accordance with this Procedure, which is available on [HSENet](#) along with a [Quick Reference Guideline](#).

1.4 Leader responsibilities

Leaders play an important role in preventing and addressing work-related grievances or concerns. They are responsible for:

- fostering a culture supportive of speaking up and aligned to our PNA values;
- taking early, sensitive, and positive steps to prevent grievances, even if no formal complaint has been made;
- taking all reasonable and proportionate steps to prevent all forms of unacceptable behaviour and unlawful conduct;
- identifying, responding to, and resolving problems or concerns in the workplace;
- treating all complaints raised seriously and fairly;
- acting on incidents raised with them, in some circumstances irrespective of whether the employee is making a formal report or not; and
- providing care and support to victims or those that speak up.

Our People & Culture representatives provide support and guidance to leaders in handling inappropriate conduct or grievances effectively.

2. When to Speak Up

Employees are encouraged to raise concerns promptly to help identify and address issues, improve our operations, and ensure a safe and ethical workplace.

If you are uncertain about speaking up about misconduct or inappropriate behaviour, consider the following questions to help ascertain if you should speak up:

- Is it consistent with **safety above all else** and our people being home safe every day?
- Is it **legal** or **ethical**?
 - Could it be considered fraud or a bribe?
 - Could it affect your impartiality or ability to do your job, or impact on the perception of you making an appropriate decision?
- Is it **consistent with our policies**, including Our Code of Conduct?
- Does it **align with our PNA and our values**?
- **Does it feel right?** Does it fit with your personal values and conscience?
- What advice would you give a loved one in a similar situation?
- Are you comfortable with the **potential impacts on others if you don't report it**?
- Would you feel comfortable if the story appeared in the media?

2.1 Speaking up as a bystander

Any individual who witnesses or becomes aware of inappropriate conduct, whether they are present when it occurs or not, is considered a bystander.

When faced with a situation, we encourage our people to be an active bystander. You can take the “See | Talk | Report | Support” approach:

- **See** – recognise inappropriate conduct or behaviour
- **Talk** – if safe to do so, talk to the person involved and ask them to stop
- **Report** – report the matter as a bystander
- **Support** – offer your help to individuals subject to inappropriate conduct, encourage and guide them through the reporting process, and refer them to support services

2.2 Reasonable grounds

When reporting an allegation, complaint, or concern, ensure **you have reasonable grounds to do so**. This means having good reason to raise the concern, such as suspecting the conduct because you have valid evidence or logical information that supports your concern.

Should you be found to have made a knowingly false or malicious report, it may result in disciplinary action up to and including termination.

3. How to Speak Up

3.1 What information is required

When speaking up you should provide as much information as possible, such as:

- your name, unless reporting anonymously;
- the nature of the conduct or concern;
- when, where and who was involved;
- any measures you may have already taken or whether you have already raised the concern with anyone else at Pacific National;
- any evidence and where the evidence is located;
- any further information that could help investigate; and
- if you are concerned about potential reprisal for raising a concern.

3.2 Who to contact

Speak up to the person you are most comfortable to do so. The table on the next page can be used as a guide on who to speak up to, based on the nature of your concern.



You are encouraged to speak to your direct leader where possible. They can provide support and guidance for addressing concerns or grievances.

Personal work-related grievances (such as workplace conflict or employment related grievances) must be discussed with your direct leader or other appropriate person, such as indirect leader or People & Culture representative.

Work health and safety matters must be raised and managed in accordance with the [Safety Issue Resolution Procedure](#), available on [HSENet](#). Speak to your direct leader or other appropriate person, such as PN HSE representative or indirect leader where more appropriate.

Choose a contact most appropriate to the concern / circumstances.								
	Direct leader	PN HSE Rep	P&C Rep	Indirect leader	Any senior leader	STOP line	Whistle-blower Committee	EAP or Peer Connect for personal support
Personal wellbeing concerns	✓	✓	✓	✓				✓
Personal work-related grievances	✓		✓	✓				✓
Work health, safety & environment Refer to Safety Issue Resolution Procedure	✓	✓		✓	✓	✓		✓
Bullying, harassment & discrimination Refer to the Respect at PN Policy	✓		✓	✓	✓	✓		✓
Inappropriate behaviour Refer to the Code of Conduct	✓		✓	✓	✓	✓		✓
Reportable Conduct Refer to the Whistleblower Policy						✓	✓	✓
If you wish to remain anonymous						✓	✓	✓

(a) External confidential STOPLine

For potential or suspected breaches of the law, regulations, obligations or if you do not feel comfortable reporting through the recommended channels, you can contact our external [confidential hotline](#) (STOPLine).

The STOPLine is the preferred approach for whistleblower disclosures. Refer to the Whistleblower Policy for further information on whistleblower disclosures.

By telephone (no caller id):	1300 304 550
By mail:	Pacific National Pty Ltd c/o STOPLine, Locked Bag 8, Hawthorn, VIC 3122
By confidential email:	pacificnational@stoline.com.au

(b) Support Services

Our support services can provide personal or wellbeing support, counselling, or just a confidential chat not restricted by topic, but is not a formal method for an employee to report a concern or grievance.

They can be utilised anonymously or confidentially. Please note that if you are at risk of harming yourself or others our Support Services may be obligated to act to ensure your safety or provide information where required by law. Where obligated, our external support services (i.e. EAP) would only report risk of harm to the appropriate emergency services.

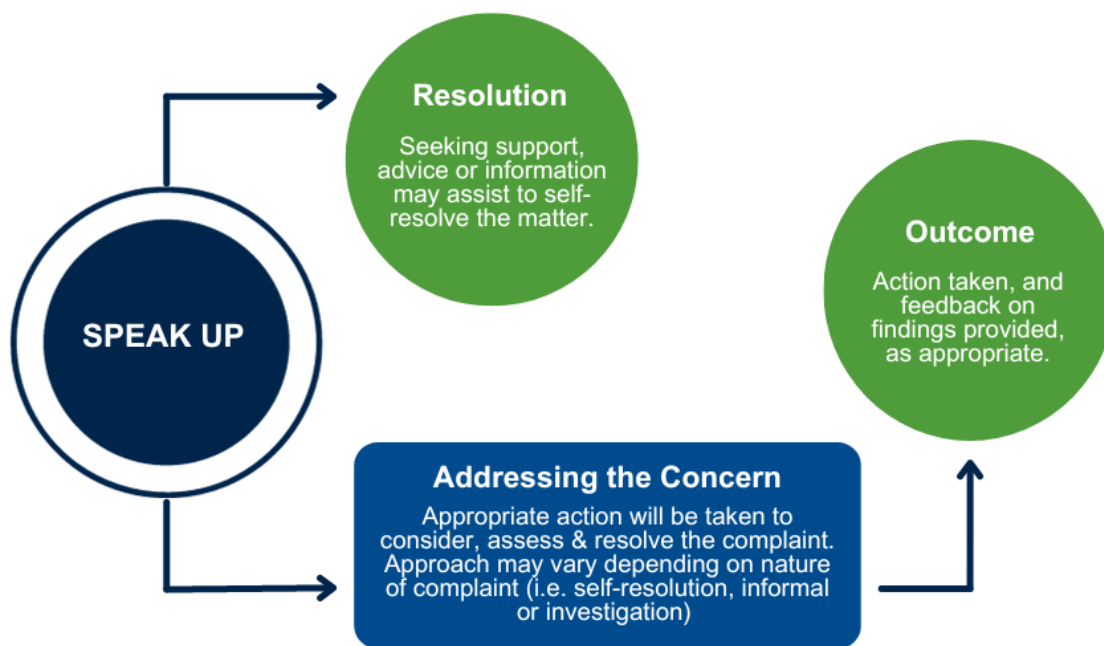
- Our [Employee Assistance Program](#) ('EAP') provides confidential counselling and support to any employee and their immediate family member who may require assistance.
- Our [Peer Connect program](#) provides a peer-to-peer support network, with access to support from mental health trained colleagues as a friendly ear for a confidential chat or to assist with connecting with other professionals if needed.
- We also provide several other health and wellbeing resources. Further details are available on the dedicated page on [The Junction](#), or through your leader or P&C representative.

4. What happens when you speak up

It is important to understand that letting the organisation know about a concern does not necessarily trigger a formal investigation, although it may be appropriate or necessary in some cases.

Speaking up can mean seeking information and support to decide what the appropriate course of action might be. In some instances, it may include talking to your leader about potential options, where you can get personal support, and the different options available to support informally resolving the issue.

Some issues may, however, warrant escalation to a formal investigation regardless of the complainant's preference, particularly if the issue being raised may constitute serious misconduct, criminal behaviour or pose a risk to the health and safety of others.



4.1 Anonymity and confidentiality

Pacific National is committed to protecting the identity of people who speak up to raise misconduct or inappropriate behaviour, as appropriate and consistent with applicable laws.

When you speak up the information you provide will be dealt with confidentially as far as possible. If you wish to remain anonymous, all reasonable steps will be taken to reduce the risk you are identified. This means the information you provide will only be shared where it is necessary, such as to apply procedural fairness to the respondent, or where allowed or required to be disclosed by law.

You can speak up anonymously by contacting the STOPline. Although all reasonable measures will be taken to protect your identity.

5. Grievance resolution process

Pacific National strives to create a fair and just work environment, ensuring employees have access to processes for resolving workplace grievances.

The grievance resolution process aims to resolve issues promptly and as close to the source as possible. We seek to address matters raised in an impartial and fair way, applying appropriate sensitivity, and taking action that is proportionate to the nature of a substantiated complaint.

Our approach is to find a resolution, not to find fault, blame or initiate disciplinary action. Although depending on the nature and seriousness of a complaint, an investigation or disciplinary outcome may be necessary.

When a complaint is being addressed, normal work should continue unless it poses a health and safety risk.

Note: An alternative dispute or grievance resolution process may be applicable depending on the nature of the concern (such as in accordance with the [Whistleblower Policy](#) for whistleblower disclosures, the [Safety Issue Resolution Procedure](#) for work health and safety matters, or in accordance with the employee's terms of employment (such as an Enterprise Agreement). Refer to [Section 1](#) of this Procedure for further guidance.

5.1 Determine appropriate person

Upon receiving a complaint, the leader (or party receiving the complaint) must determine if they are the right person to address it. If not, they should advise the employee and redirect the complaint to an appropriate person.

5.2 Consider and provide information

The complaint should be discussed with the complainant as soon as practical after it is raised (unless the matter has been raised anonymously).

The party handling the complaint must explain to the complainant the process, confidentiality, prevention of victimisation, support mechanisms, and any relevant timeframes. They may also discuss the desired outcome to support with deciding the next steps.

5.3 Determine appropriate handling method

The process for dealing with a complaint may differ depending on the seriousness of the allegations, the desired outcome, safety and wellbeing of the complainant, and legal obligations. Minor interpersonal issues and misunderstandings may be resolved with minimal formality.

(a) Self-resolution approach (if appropriate)

If the complainant feels comfortable and safe, they may address the issue with the person directly. They should express their concerns, request that the behaviour stops, and identify the behaviour as unwelcome.

(b) Informal resolution

Informal management of a grievance seeks agreement and a shared understanding between the parties to resolve matters and avoid misunderstandings. It is best suited for less serious allegations that do not warrant disciplinary action being taken. An informal approach emphasises resolution rather than substantiation, and might include:

- providing advice or support to assist with self-resolution strategies.
- facilitating discussions to attempt to resolve the matter.
- discussing the matter privately with the person against whom the allegations are made.
- providing individual or team training, coaching, or mentoring, including awareness of relevant policies that may apply (such as Code of Conduct).

- monitoring or observing and intervening if the behaviour occurs again.
- following up to ensure any agreed resolution actions are taken.
- putting in place new practices or changes to aid in the resolution.

(c) Formal investigations

A formal approach to grievance resolution typically involves investigating the complaint, making a finding, and deciding on an appropriate outcome.

Investigations will abide by the principles of fairness, transparency, and a timely resolution. Pacific National applies the principles of procedural fairness; with the parties given the opportunity to be heard and respond to the complaint or allegations, and the resolution process being conducted impartially, honestly and without bias.

Investigations may involve:

- formal interviews and documentation of the allegations;
- consultation with the aggrieved employee throughout the period of investigation;
- collection of witness statements or other evidence where available;
- decision upon whether the inappropriate conduct or breach has occurred and appropriate course of action; and
- a response to the employee regarding the findings of the investigation.

It may be appropriate in the circumstances to confidentially provide the findings of the investigation at its conclusion to the complainant, but not the outcome that may apply to the respondent.

In all instances the relevant **People & Culture representative must be consulted where a formal investigation** is required.

Employees are entitled to a support person with them at any stage during a formal resolution process.

5.4 Resolutions

Once the facts have been established, the person responsible for resolving the grievance or concern should meet with the complainant to discuss possible options for resolution and likely outcomes.

If the matter remains unresolved to the complainant's satisfaction, they may escalate in writing to the relevant People & Culture representative or another senior leader.

6. Honesty, cooperation, and respecting confidentiality

We are all responsible for cooperating in, and respecting the confidentiality of, any enquires or investigations about a concern, complaint or grievance raised.

You must participate truthfully, honestly, completely and in good faith. The parties to a grievance should be genuinely focused on achieving a resolution to the concerns raised. Failure to comply with these requirements may result in disciplinary measures.

Confidentially must be maintained, except where necessary to make enquiries or investigate a matter or subject to legal requirements for disclosure. Failure to comply with confidentiality requirements may result in disciplinary measures.

7. No tolerance for retaliation or victimisation

Pacific National will not tolerate anyone being discouraged from speaking up. You can speak up without fear of reprisal, intimidation, or victimisation. We are committed to caring for those that speak up.

All forms of retaliation and victimisation are a serious breach of this Procedure and our Code of Conduct, and may result in disciplinary action, up to and including termination. If anyone directs, endorses, or encourages any form of retaliation or victimisation they may also be held accountable.

If you feel you, or someone else, has been subject to retaliation or victimisation for speaking up, you should report it immediately. This may be to the person appointed to undertake the investigation, your People and Culture Representative, or the STOPLine.

If you have any questions on this Procedure, please contact the HR Services team by email at humanresources@pacificnational.com.au.

Procedure Details

INFORMATION	
Policy Category	People and Culture
Approval Date	October 2023
Review Date	October 2025
Policy Owner	Head of People & Culture
Approving authority	Chief People & Culture Officer

RELATED DOUCMENTS	
Legislation	Fair Work Act 2009 (Cth) Work, health and safety legislation (Commonwealth and State based)
Policy	Respect at Pacific National Policy Code of Conduct Whistleblower Policy
Procedure	Safety Issue Resolution Procedure
Supporting Documents	Pacific National Approach (Our PNA)