WHISTLEBLOWER POLICY

1. Purpose

1.1. The purpose of this policy is to outline the systems and processes which MOVE Logistics Group, and its related companies (MOVE) has put in place to allow staff to raise concerns, ensure that whistleblowing complaints about serious misconduct, wrongdoing and health and safety concerns are managed in a consistent and structured manner, and protect employees who make such disclosures.

1.2. MOVE is committed to providing a safe place to work and promoting a culture of compliance, honesty and ethical behaviour within MOVE. This includes providing an environment where team members are encouraged to report any serious wrongdoing in good faith and free from victimisation so that the Board and senior management can adequately manage risk and ensure it delivers on its promise of providing a safe work environment that meets MOVE's standards.

1.3. MOVE encourages all employees to report serious wrongdoing. MOVE's attitude is – "when in doubt report". All employees should feel confident and comfortable about reporting serious wrongdoing.

1.4. MOVE is committed to protecting and supporting the dignity, wellbeing, career and good name of anyone reporting a serious wrongdoing in good faith.

2. Scope

2.1. This policy applies to all employees, including directors, managers, employees, contractors and consultants in all businesses and subsidiaries within MOVE.

2.2. It covers all operations of MOVE and its subsidiaries, and any alleged, actual or suspected serious wrongdoing or serious misconduct involving MOVE employees, vendors or other external parties with a business relationship with MOVE.

3. Policy

3.1. MOVE has adopted the definition of serious wrongdoing as provided in the Protected Disclosures (Protection of Whistleblowers) Act 2022 (the Act), being:

3.1.1. any unlawful, corrupt, or irregular use of funds or resources;

3.1.2. any act, omission, or course of conduct that constitutes a serious risk to public health, public safety, the health or safety of any individual or the environment. This includes bullying and harassment, which are now explicitly recognised under the Act as serious risks to health and safety;

3.1.3. any act, omission, or course of conduct that constitutes a serious risk to the maintenance of law, including the prevention, investigation, and detection of offences and the right to a fair trial;

3.1.4. any act, omission, or course of conduct that constitutes an offence; or

3.1.5. any act, omission, or course of conduct that is oppressive, discriminatory, or grossly negligent, or that constitutes gross mismanagement.

4. Reporting Serious Wrongdoing

4.1. If a team member has evidence that serious wrongdoing is happening within MOVE, they are encouraged to draw attention that wrongdoing to the relevant authority within MOVE or, if there is no other choice, to a responsible authority outside MOVE.

4.2. It is preferred that such reports are made in writing, clearly identifying the nature of the suspected wrongdoing and the person or persons involved. If the person making the disclosure has any personal interest or involvement in the matter, this should be declared at the outset.

4.3. Details of whom to inform are below. In order of priority, disclosure should be made to the following people:

4.3.1. direct line of management;

4.3.2. General Manager People and Culture;

4.3.3. other management reports;

4.3.4. Anonymous report and

4.3.5. other appropriate authorities outside MOVE. Employees may do so at any time, regardless of whether internal channels have been used.

4.4. See below for more information on details on how to disclose wrongdoing to each of these reports.

5. Manager

5.1. The employee is encouraged to first discuss their concern with their manager. Any employee that submits or receives a report must treat the matter confidentially. However, this may not always be appropriate. Therefore, the employee can report to the people set out below.

6. General Manager People and Culture

6.1. If the employee does not want to talk to their direct manager, or their concern relates to their direct manager, then they are encouraged to contact MOVE's General Manager People and Culture.

7. Other Management Reports

7.1. If the employee does not feel comfortable speaking with their Manager or the General Manager People and Culture, they can report their concern to:

7.1.1. another member of MOVE's management team;

7.1.2. the General Manager of the subsidiary;

7.1.3. the Chief Executive Officer of MOVE; or

7.1.4. the Chair of MOVE's Risk Assurance & Audit Committee

8. Anonymous Report:

8.1. MOVE would prefer that whistleblowers make a report openly and disclose their identity. However, MOVE recognises that employees may prefer to bypass management in certain circumstances, including but not limited to, the following situations:

8.1.1. they believe they may be victimised if they use a normal reporting channel; or

8.1.2. they prefer to make the report anonymously.

8.2. In these circumstances, employees may send an anonymous report in writing to the Chair of MOVE's Risk Assurance and Audit Committee, who is not an employee of MOVE.

8.3. Whistleblowers should be aware that it will be more difficult to investigate and take action in relation to wrongdoing that is made anonymously and maintaining the anonymity of the whistleblower's identity may be difficult where the nature of the wrongdoing points to a particular individual or individuals having made it or where some disclosure is necessary as part of the investigation process. Disclosure of identifying information may also be considered a privacy breach under the Privacy Act 2020.

9. Disclosure of the Whistleblower

9.1. Disclosure may occur if there are reasonable grounds to believe that releasing the identifying information is essential either:

9.1.1. for the effective investigation of the disclosure

9.1.2. to comply with natural justice principles

9.1.3. to prevent a serious risk to public health, public safety, an individual's health or safety, or the environment

9.1.4. to an investigation by a law enforcement or regulatory agency for law enforcement

9.2. MOVE will consult the whistleblower before the release and inform them after releasing. MOVE will also ensure compliance with the Privacy Act 2020 when handling identifying information.

10. Other Authorities Outside MOVE:

10.1. Whilst we would prefer to create a culture where people feel comfortable to report wrongdoings internally, the policy does not prevent an employee from reporting a wrongdoing to a regulator under an applicable law or prudential standard.

10.2. In certain circumstances employees may also inform other appropriate authorities outside MOVE such as the Commerce Commission, Human Rights Commission, Director of Serious Fraud Office or any other appropriate authority as defined in the Protected Disclosures (Protection of Whistleblowers) Act 2022.

In no circumstances should an employee disclose any information to the news media, including social media, as this will not afford them protected disclosure. Employees are encouraged to use the internal and legal channels outlined in this policy to ensure their disclosures are protected under the law.

11. Investigating Wrongdoing

11.1. Reports of wrongdoing raised through these channels will be investigated thoroughly and that the investigation will be conducted in accordance with the principles of fairness and natural justice.

11.2. Investigations of wrongdoing will be conducted in a manner that is confidential, fair and objective. The investigation processes may vary depending on the nature of the wrongdoing and the amount of information provided.

11.3. The General Manager of the subsidiary business is responsible for overseeing the investigation of wrongdoing. Depending on the seriousness of the claims, the investigation may also be overseen by the Chief Executive Officer. If the claim is about the General Manager of the subsidiary, then the investigation will be overseen by the Chief Executive Officer. If the claim is about the Chief Executive Officer, then the investigation will be overseen by the Chair of MOVE's Risk Assurance and Audit Committee.

11.4. Within 20 working days of receiving a protected disclosure, MOVE will:

11.4.1. acknowledge to the discloser the date the disclosure was received (and, if the disclosure was made orally, summarise the receiver's understanding of it)

11.4.2. consider the disclosure and whether it warrants investigation

11.4.3. check with the discloser whether the disclosure has been made elsewhere (and any outcome)

11.4.4. deal with the matter by doing 1 or more of the following:

a) investigating the disclosure

b) addressing any serious wrongdoing by acting or recommending action

c) referring the disclosure to an appropriate authority.

d) deciding that no action is required under section 15 of the Act

11.4.5. inform the discloser (with reasons) about what the receiver has done or is going to do to deal with the matter in line with the above bullet.

11.5. However, if it is impracticable to complete these actions within 20 working days, MOVE will take the first 3 actions above within 20 working days, and then will:

11.5.1. inform the discloser how long MOVE expects to take to deal with the matter

11.5.2. appropriately update the discloser about progress

11.6. In cases where the Investigator has not substantiated the allegations, an appropriate explanation will be provided to the whistleblower, subject to any privacy and confidentiality rights.

11.7. The whistleblower must always keep the information disclosed and all matters arising confidential between themselves and the person to whom they have disclosed the information.

12. Protected Disclosures (Protection of Whistleblowers) Act 2022

12.1. Employees employed in New Zealand who are aware of a serious wrongdoing have a specific set of legal protections if they decide to disclose their concerns and can choose to make a protected disclosure. This is different to reporting serious misconduct and wrongdoing with the main difference being the protection offered by the Protected Disclosures (Protection of Whistleblowers) Act 2022.

12.2. The Act allows that, subject to specific criteria and provided the procedure set out in this policy is followed, a person who reports a serious wrongdoing is protected from civil or criminal proceedings and disciplinary action.

12.3. In summary Employees can choose to make a protected disclosure when:

12.3.1. the information is about serious misconduct or serious wrongdoing in or by MOVE or its subsidiaries;

12.3.2. the disclosing Employee believes on reasonable grounds that the information is true or likely to be true;

12.3.3. the disclosing Employee wishes to disclose the information so that the serious misconduct or serious wrongdoing can be investigated; and

12.3.4. the disclosing Employee wishes the disclosure to be protected.

12.4. All protected disclosures will be immediately referred to the General Manager People and Culture.

12.5. Where employees who make a protected disclosure of information suffer retaliatory action from MOVE, that person can take personal grievance proceedings under the Employment Relations Act 2000. It is also unlawful to treat whistleblowers or potential whistleblowers less favourably than others in the same or similar circumstances. Where employees are victimised in this way, that person may have legal remedies under the Human Rights Act 1993.

12.6. These protections encourage people within companies, or with special connections to companies, to alert MOVE (through its officers), to illegal behaviour.

13. False Disclosure

13.1. MOVE is committed to the protection of genuine whistleblowers against reprisals. However, where it is shown that a person purporting to be a whistleblower has knowingly made a false claim, or has not made a claim in good faith, of wrongdoing, then that conduct itself will be considered a serious matter and may render the person concerned subject to disciplinary proceedings (which may include termination of employment).

14. Role and Responsibilities

14.1. Management, including MOVE's Chief Executive Officer and individual business managers, are responsible for ensuring employees are aware of this policy across the organisation and within their businesses.

14.2. MOVE's General Manager People and Culture as the policy owner is responsible for ensuring this policy is easily accessible to all of MOVE's people. This includes making the Policy available on the MOVE website and Intranet.

14.3. The Board is responsible for ensuring this policy is reviewed regularly and updated whenever there are significant regulatory changes or business needs.

Document Control

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