

WHISTLEBLOWER POLICY

Document Policy and Ownership

Document Number	112	Document Owner	Board of Directors
Date of Issue	12/08/2024	Review Frequency	Biennial
Date of this Review	23/09/2024	Date of next Review	23/09/2026
Date Approved	23/09/2024	Approved By:	Board of Directors
Version	V3		

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1. Introduction

- 1.1. This document (**Policy**) establishes a framework for individuals to report behaviour in accordance with the whistleblower provisions contained Part 9.4AAA of the *Corporations Act 2001* (Cth) (**the Corporations Act**) or Part IVD of the *Tax Administration Act 1953* (Cth) (**the Tax Act**) insofar as they relate to the Finance Brokers Association of Australasia Limited (**FBAA**). The Policy is an important tool to assist the FBAA in identifying wrongdoing that may not be uncovered unless there is a safe and secure means for doing so.
- 1.2. Any individual who is aware of or suspects wrongdoing in relation to the FBAA is encouraged to review this Policy and make disclosure to the FBAA in accordance with this Policy. The FBAA seeks to build confidence and trust with individuals looking to report possible wrongdoing.

Purpose

- 1.3. The purpose of this Policy is to:
- (a) encourage more disclosures of wrongdoing;
 - (b) help deter wrongdoing in line with the FBAA's governance framework, policies, and code of conduct;
 - (c) ensure that individuals who disclose wrongdoing can do so safely, securely, and with confidence that they will be protected and supported;
 - (d) ensure disclosures are dealt with appropriately and on a timely basis; and
 - (e) provide transparency around the FBAA's framework for receiving, handling, and investigating disclosures.
- 1.4. This Policy applies to the FBAA, its officers and employees and any individual who makes a disclosure purportedly pursuant to this Policy.

Key Terms

- 1.5. While the FBAA invites all disclosures about matters which concern their employees and business relationships, not all disclosures are protected under the Corporations Act or the Tax Act.
- 1.6. There are three terms which are generally used to work out whether or not a disclosure will be protected. Generally, a disclosure will be protected by the Corporations Act or the Tax Act if:
- (a) it is an "**Eligible Disclosure**";

- (b) the disclosure is made by an **“Eligible Whistleblower”**; and
- (c) the disclosure is made to an **“Eligible Recipient”**.

1.7. A disclosure that satisfies these requirements is called a **“Protected Disclosure”**.

1.8. In order to work out whether or not your disclosure may be protected under the Corporations Act or the Tax Act, please review the table set out in **Appendix 1**.

Review of this Policy and how to obtain a copy

1.9. This Policy is overseen by the Governance Committee of the FBAA’s board of directors (**the Board**).

1.10. This Policy is available at the following locations:

- (a) in hard copy form at the FBAA Head Office, L1, 1 Miles Platting Road, Eight Mile Plains, Queensland; and
- (b) in electronic form on the FBAA’s website.

1.11. A copy of this policy will also be emailed following each review to all employees of the FBAA. We recommend employees keep a copy of this policy readily accessible to them.

1.12. You can request a copy of this Policy any time by contacting the FBAA Disclosure Officer.

2. When may you be protected?

2.1. Generally, a person may be protected when they make a Protected Disclosure. This requires the disclosure to be made by an Eligible Whistleblower, about an “Eligible Disclosure” to an “Eligible Recipient”.

Who is an “Eligible Whistleblower”

2.2. The types of Eligible Whistleblower are set out in Appendix 1.

Who is an “Eligible Recipient”

2.3. The types of Eligible Recipients for each type of Eligible Disclosure are set out in Appendix 1.

2.4. The FBAA has appointed the following individual as the FBAA Disclosure Officer whom you can contact directly anonymously, confidentially and outside of business hours at the details set out below:

Name	Position	Contact Information
Ms Jill Fleck	Director	whistleblower@fbaa.com.au

- 2.5. You can also post your disclosures to the FBAA at PO Box 4792, Eight Mile Plains QLD 4113 and addressed to the FBAA Disclosure Officer. If you decide to make your disclosure in this manner, please ensure the correspondence is addressed to the FBAA Disclosure Officer and is marked Confidential and for Urgent Attention.
- 2.6. The FBAA recommends that you contact the FBAA Disclosure Officer in the first instance as this individual has been specifically appointed to consider disclosures in accordance with this Policy and will be best equipped to assist you.
- 2.7. If your disclosure involves the FBAA Disclosure Officer, then you should contact the chairperson of the Board. If your disclosure involves both the FBAA Disclosure Officer and the chairperson of the Board, then you should contact any other director of the Board (**Other Board Member**). The contact email address for the directors of the Board are available on the FBAA's website at <https://www.fbaa.com.au/about/board/>.

What is an “Eligible Disclosure”

- 2.8. The types of Eligible Disclosures are set out in Appendix 1. If your disclosure is not about these matters, then you will not qualify for protection under either the Corporations Act or the Tax Act.
- 2.9. An Eligible Disclosure may:
- (a) include, but is not limited to, conduct such as fraud, money laundering, misappropriation of funds, and a failure to comply with or breach of regulatory requirements or information which indicates a significant risk to public safety or the stability of, or confidence in, the financial system even if it does not involve a breach of a particular law.
 - (b) still be protected even if the substance of the disclosure is not correct.
- 2.10. It is important to understand that an Eligible Disclosure generally will not include personal work-related grievances such as:
- (a) any interpersonal conflict or dispute between you and another employee or officer of the FBAA; or
 - (b) any decision relating to the engagement (including the terms, suspension or termination of an engagement), transfer, promotion or discipline of the individual.
- 2.11. A personal work-related grievance can be an Eligible Disclosure if the relevant conduct also has significant implications for the FBAA or another entity, or, relates to other conduct which would itself be an Eligible Disclosure.

2.12. If your disclosure does not relate to these matters, then you should consider the terms of any agreement under which you are engaged or any other policies the FBAA has to resolve their concerns instead of making a whistleblower complaint.

Other circumstances where you may be protected

2.13. If you do not disclose matters to the FBAA, you may also be protected where:

- (a) you disclose matters to a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of either Part 9.4AAA of the Corporations Act or Part IVD of the Tax Act;
- (b) your disclosure would be protected by the Corporations Act, on the basis that:
 - (i) you have made a disclosure under this Policy (**Previous Disclosure**);
 - (ii) ninety (90) days have passed since you made that disclosure;
 - (iii) you do not have reasonable grounds to believe that the Previous Disclosure has been, or is being actioned by the FBAA;
 - (iv) you have reasonable grounds to believe that making a further disclosure would be in the public interest;
 - (v) you have given the FBAA notice in writing to the FBAA Disclosure Officer as set out above, after ninety (90) days have passed since you made that disclosure that allows the FBAA to identify the Previous Disclosure and informs the FBAA of your intention to make a public disclosure; and
 - (vi) you make a disclosure to a member of the Commonwealth or State Parliament (or Territory legislature) or a journalist, that is no greater than is necessary to inform that individual of the misconduct or the improper state of affairs or circumstances identified in the Previous Disclosure.
- (c) where your disclosure would be protected by the Corporations Act, on the basis that:
 - (i) you have made a disclosure under this Policy (**Previous Disclosure**);
 - (ii) you have reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment;
 - (iii) you have given the FBAA notice in writing allowing the FBAA to identify the Previous Disclosure and informs the FBAA of your intention to make an emergency disclosure; and

- (iv) you make a disclosure to a member of the Commonwealth or State Parliament (or Territory legislature) or a journalist, that is no greater than is necessary to inform that individual about the substantial and imminent danger identified in the Previous Disclosure.

2.14. It is important for an individual to understand the criteria for making public interest or emergency disclosures. An individual should contact a legal practitioner before making public interest or emergency disclosures.

3. What are your protections?

3.1. Where you make a Protected Disclosure:

- (a) your identity will be treated confidentially unless the disclosure of your identity would be authorised by law;
- (b) you will:
 - (i) not be subject to any civil, criminal or administrative liability (including disciplinary action) for making the disclosure;
 - (ii) not be exposed to any contractual or other remedy being enforced against you for making the disclosure;
 - (iii) not have that information admitted against you in any criminal proceeding except to the extent the information is false; and
- (c) you will be protected from Detriment (as set out below).

3.2. A disclosure may still be a Protected Disclosure even if the substance of the disclosure is not correct.

Protecting your identity

3.3. Where you make a Protected Disclosure, the FBAA will protect your identity by:

- (a) redacting all personal information or reference to you witnessing an event and referring to you in a gender neutral context (such as by labelling you as the “Discloser”);
- (b) where possible, contacting you to help identify certain aspects of any Protected Disclosure that could inadvertently identify you;
- (c) ensuring disclosures are handled and investigated by qualified staff; and
- (d) restricting access to information provided by you to those directly involved in managing and investigating the disclosure (which will include the Board).

- 3.4. The FBAA may not be able to prevent other people from identifying you in, for example, circumstances where you have previously discussed the matter with other people or there are a limited number of people with access to the relevant information.
- 3.5. The FBAA may disclose your identity with your consent or, without your consent in the following circumstances:
- (a) the disclosure is to ASIC, APRA or a member of the Australian Federal Police;
 - (b) to a solicitor for the purpose of obtaining legal advice or representation; or
 - (c) to a person or entity prescribed by law.
- 3.6. The FBAA may disclose information included in your disclosure with your consent or, without your consent provided that:
- (a) the information does not include your identity;
 - (b) the FBAA has taken all reasonable steps to reduce the risk that you will be identified;
 - (c) it is reasonably necessary for investigating your disclosure.

Protection against Detriment

- 3.7. A “**Detriment**” includes the occurrence or threatened occurrence of dismissal, injury, discrimination, harassment, intimidation, harm or damage to you or your property, business, finances or reputation either by the FBAA, its employees or officers. It may also include any other type of “Detriment” as may be identified in section 1317ADA of the Corporations Act or section 14ZZZAA of the Tax Act.
- 3.8. Actions which are not considered a Detriment (and, where you make a Protected Disclosure, you are not ‘protected’ from them) include:
- (a) administrative action that is reasonable for the purpose of protecting you from Detriment. For example, if you made a disclosure regarding your work area, it will not be a Detriment to move you to another work area;
 - (b) managing your work performance in line with the FBAA’s performance management framework if your performance is unsatisfactory.
- 3.9. You will be protected from a Detriment if it was, or would be, caused because you made, or may make, a disclosure which is protected by the Corporations Act or the Tax Act.
- 3.10. Where you make a Protected Disclosure, the FBAA will protect you from Detriment by:
- (a) assessing the disclosure for risks;

- (b) if you are an employee of the FBAA, providing consultation for suitable alternatives to current working arrangements;
- (c) providing to you a contact person for complaints; and
- (d) taking disciplinary action against a person responsible for causing a Detriment.

3.11. You are not protected and will not receive immunity for any misconduct that you have engaged in which is revealed as a result of any Protected Disclosure that you make.

3.12. The FBAA will support Eligible Whistleblowers who make a Protected Disclosure and protect them from Detriment by providing you with a contact person who they can consult with confidentially if they at any time feel they may be experiencing a Detriment. That contact person can then develop a plan with the Eligible Whistleblower who has made a Protected Disclosure to help address the situation, and this may be the person assigned to manage the disclosure.

3.13. While protecting you from Detriment or identification as a result of making a Protected Disclosure is important, the FBAA must also ensure fair treatment of any of its employees mentioned in a Protected Disclosure. The FBAA will balance these competing concerns by:

- (a) objectively assessing whether there is enough evidence to substantiate or refute the matters reported;
- (b) interviewing those employees identified in a Protected Disclosure so that those employees can provide their perspective; and
- (c) only taking a step during the course of an investigation to suspend that employee if that employee takes steps to interfere with such investigation.

3.14. If you believe you have suffered Detriment, you may seek independent legal advice or contact a regulatory body such as ASIC, APRA, or the ATO.

Compensation and Remedies

3.15. You can seek compensation and other remedies through the courts if:

- (a) you suffer loss, damage, or injury because of a Protected Disclosure; and
- (b) the FBAA failed to take reasonable precautions and exercise due diligence to prevent Detrimental conduct.

3.16. The FBAA encourages you to seek independent legal advice prior to pursuing court proceedings.

3.17. The FBAA is prohibited by law from disclosing your identity (which may arise where you make a Protected Disclosure), or any information that is likely to lead your identification. If you have reason to believe that the FBAA has disclosed your identity or information that is likely to lead to your identification, then you may:

- (a) make a complaint to the FBAA; and/or
- (b) lodge a complaint with ASIC, APRA, or the Australian Taxation Office (**ATO**) for investigation.

Civil, Criminal and Administrative Liability Protection

3.18. Where you make a Protected Disclosure:

- (a) you cannot be subject to any civil, criminal or administrative liability for making a Protected Disclosure;
- (b) no contractual or other remedy or right be enforced or exercised against you on the basis of making a Protected Disclosure; and
- (c) information you provide as part of a Protected Disclosure is not admissible against you in a criminal proceeding or a proceeding that seeks to impose a penalty, except where the proceedings relate to the falsity of the information provided.

3.19. As a result, while a Protected Disclosure will be protected even if your underlying disclosure is incorrect, you should endeavour to avoid deliberately reporting false matters.

4. Making a Disclosure

4.1. The FBAA encourages individuals to report Eligible Disclosures to the FBAA in first instance so that they may identify and address wrongdoing as early as possible. You can report Eligible Disclosures externally (such as to ASIC) and may still qualify for protections.

How to make a disclosure

4.2. You can make an Eligible Disclosure to the FBAA verbally or in writing to an Eligible Recipient. In order to maximise the effectiveness of your disclosure, the FBAA recommends that you make an Eligible Disclosure to the FBAA by completing and submitting to the FBAA Disclosure Officer, the form produced in Appendix 2. You should also include any supporting information that you have relied upon to form your suspicion. This is because in order to qualify for protection, you must have reasonable grounds to suspect wrongdoing, and an allegation without any supporting information may not meet this standard.

- 4.3. The role of an Eligible Recipient (and in particular, the FBAA Disclosure Officer) is to receive reports and information from Eligible Whistleblowers regarding Eligible Disclosures. Making your disclosure to an Eligible Recipient (and in particular, the FBAA Disclosure Officer) maximises the likelihood that the person who you approach is aware of the purpose of your disclosure, their obligations (including as to preserving confidentiality) and the relevant processes.
- 4.4. If you would like to obtain more information about reporting an Eligible Disclosure, you may wish to contact the FBAA Disclosure Officer or obtain your own independent legal advice.

How will your disclosure be dealt with if you wish to be anonymous

- 4.5. You can still make an Eligible Disclosure (and it can be a Protected Disclosure) even if you elect to remain anonymous. Alternatively, you can elect to be identified by a pseudonym. Where you make a Protected Disclosure, you can refuse to answer questions that could reveal your identity without losing any protection.
- 4.6. If you decide to report an Eligible Disclosure anonymously, then you should provide a contact method for the FBAA to use should the FBAA require further information.
- 4.7. If you do not provide sufficient information regarding an Eligible Disclosure and do not provide a method to contact you for further information, then the FBAA may not be able to deal with your disclosure even if it is a Protected Disclosure.

Fair treatment of those identified in disclosures

- 4.8. As the FBAA may, as a result of any disclosures, take action against those engaged in wrongdoing, the FBAA is committed to fairly treating those who have been identified in a disclosure as engaging in alleged wrongdoing by promoting natural justice and procedural fairness in any investigations.
- 4.9. The FBAA will promote natural justice and procedural fairness in any investigations by ensuring that any individuals against whom misconduct is alleged have been given an opportunity to address the substance of any Protected Disclosure and to explain any additional circumstances which that individual considers relevant to the Protected Disclosure, including whether any other individuals should be contacted as they may contain relevant information.
- 4.10. As the FBAA seeks to promote natural justice and procedural fairness in any investigations, there may be circumstances where your desire for anonymity or confidentiality will conflict with this commitment. In these circumstances, the FBAA will use reasonable endeavours to ensure confidentiality and your anonymity are preserved.

4.11. If it is likely that a person may be able to discern your identity from being provided with the substance of any Protected Disclosure and, you have elected to make a disclosure anonymously, then the FBAA will:

- (a) first, inform you of the difficulty presented by your request for anonymity and why it is impacting the FBAA's role in investigating your disclosure and invite you to withdraw that request; and
- (b) if you do not agree to withdraw your request for anonymity, then the FBAA may not be able to continue any investigation or may not be able to comply with your request for anonymity. In this event, you will be advised of this outcome and how the FBAA may proceed.

5. Actions upon receipt of a disclosure

5.1. This section sets out generally, the process by which the FBAA will consider any disclosures received. The actions and timeframes set out in this section are not strict because each disclosure is different and the actions required will vary depending upon the legal and factual complexities, the number of individuals involved and the operational restraints on the FBAA at the time. In all cases, the FBAA endeavours to proceed as efficiently as reasonably practicable.

5.2. Where a disclosure alleges misconduct against a member of the Board, that individual is excluded from any consideration of the disclosure as far as natural justice and procedural fairness will allow. In any event, that individual will not take part in any decision making or investigation of that disclosure.

Preliminary Consideration

5.3. Upon receipt of a disclosure, the Eligible Recipient will create a file, allocate a unique reference number, and assign a person responsible for managing the file (**File Manager**). The File Manager will contact you to inform you that, your disclosure has been received and advise that a preliminary assessment will be completed.

5.4. The File Manager will consider whether the disclosure provided is a Protected Disclosure.

5.5. If the File Manager considers that your disclosure is a Protected Disclosure, the File Manager will contact you to provide you with an update, whether an investigation is to be undertaken and the estimated timeframes for investigating the disclosure.

5.6. If the File Manager considers that your disclosure is not a Protected Disclosure, then the File Manager will contact you to inform you of this view, the basis for that view and invite you to advise whether you wish to continue with the disclosure.

5.7. If you decide to continue with the disclosure and it is not a Protected Disclosure, then the File Manager will investigate the disclosure in the manner it considers appropriate in the circumstances, but which may be inconsistent with this Policy. Further, in this event, you should not expect to receive the protections identified by legislation which attach to Protected Disclosures.

Investigations

5.8. An investigation of a Protected Disclosure may be undertaken by the File Manager or an external third-party.

5.9. The File Manager or the external party, as the case may be (**Investigator**) will investigate any issues identified in the Protected Disclosure. Such investigations may include the following actions:

- (a) seeking further information from you to clarify any matters in the Protected Disclosure;
- (b) collecting and considering hard copy and electronic material (such as emails) which are owned by the FBAA;
- (c) interviewing and seeking material from any individuals referred to:
 - (i) in the Protected Disclosure;
 - (ii) by you in any clarifications; and
 - (iii) in any hard copy or electronic material obtained as part of the investigation; and
- (d) interviewing and seeking hard copy and electronic material (such as emails) from any individuals about whom the Protected Disclosure relates, or from whom the Investigator considers could assist the investigation.

5.10. Throughout their investigation, the Investigator will provide updates to you. The frequency of updates may vary depending on the nature of the disclosure and the conduct of the investigation. If you make an anonymous disclosure and do not provide a way to contact you, then the FBAA will not be able to provide updates.

Reporting

5.11. Upon conclusion of any investigation, the Investigator will produce a report for the Board to consider. This report will detail the scope of the investigation, the factual findings, any conclusions reached, a root cause analysis, and any remedial recommendations made.

5.12. You will be provided with a summarised version of this report. You will not be provided certain information where it would be inappropriate to provide it to you. For example, the FBAA will not provide you with confidential information of another party.

6. Storage of records

- 6.1. Records of the disclosure, investigation, and outcome will be retained and stored securely for a minimum of seven (7) years following the close of the matter and otherwise in accordance with the FBAA's pre-existing policies. This timeframe may be extended from time to time where required.
- 6.2. If the disclosure involves criminal activity, the records will be stored indefinitely.
- 6.3. Access to these records will be restricted to authorised personnel.

Appendix 1 – When Will a Disclosure be Protected

This Appendix is provided as a summary and should be read subject to the Policy.

Protection is provided by	Who are the Eligible Whistleblowers?	Who are the Eligible Recipient?	What are the Eligible Disclosures?
Corporations Act	<p>Any of the following:</p> <ul style="list-style-type: none"> an officer or employee of the FBAA (e.g. current and former employees who are permanent, part-time, fixed-term or temporary, interns, secondees, managers, and directors); a supplier of services or goods to the FBAA (whether paid or unpaid), including their employees (e.g. current and former contractors, consultants, service providers and business partners); an associate of the FBAA (as defined in the Corporations Act); and a relative, dependant, or spouse of an individual listed above (e.g. relatives, dependants, or spouse of current and former employees, contractors, consultants, service providers, suppliers and business partners). 	<p>Any of the following:</p> <ul style="list-style-type: none"> the Australian Securities and Investments Commission (ASIC); the Australian Prudential Regulatory Authority (APRA); a director, officer, senior manager, auditor or member of the audit team, or actuary of the FBAA; or the FBAA Disclosure Officer; <p>There are other circumstances where you may disclose matters to a person or entity not listed above and still be protected (see paragraph 2.13 of the Policy)</p>	<p>You have reasonable grounds to suspect misconduct or an improper state of affairs or circumstances in relation to the FBAA.</p> <p>You have reasonable grounds to suspect that the FBAA or a director or employee of the FBAA:</p> <ul style="list-style-type: none"> has committed an offence or contravened a provision of the: <ul style="list-style-type: none"> <i>Corporations Act 2001</i> (Cth); <i>Australian Securities and Investment Commission Act 2001</i> (Cth) <i>Banking Act 1959</i> (Cth) <i>Financial Sector (Collection of Data) Act 2001</i> (Cth) <i>Insurance Act 1973</i> (Cth); <i>Life Insurance Act 1995</i> (Cth) <i>National Consumer Credit Protection Act 2009</i> (Cth); <i>Superannuation Industry (Supervision) Act 1993</i> (Cth) or any instrument made under these pieces of legislation. has committed an offence of any other law of the Commonwealth punishable by imprisonment of 12 months or more; or represents a danger to the public or to the Australian financial system

Protection is provided by	Who are the Eligible Whistleblowers?	Who are the Eligible Recipient?	What are the Eligible Disclosures?
Tax Act	<p>Any of the following:</p> <ul style="list-style-type: none"> an officer or employee of the FBAA an individual or employee of a person who supplies services or goods to the FBAA (whether paid or unpaid); An associate of the FBAA (as defined in section 318 of the <i>Income Tax Assessment Act 1936</i> (Cth)); a spouse or child of any of the above or a dependant of any of the above (or such a person's spouse); 	<p>Any of the following:</p> <ul style="list-style-type: none"> the Commissioner of Taxation; an auditor, or a member of an audit team conducting an audit of the FBAA; a registered tax agent or BAS agent (within the meaning of the Tax Agent Services Act 2009) who provides services to the FBAA; a director, secretary or senior manager or an employee whose functions or duties relate to the tax imposed upon the FBAA; the FBAA Disclosure Officer; <p>There are other circumstances where you may disclose matters to a person or entity not listed above and still be protected (see paragraph 2.13 of the Policy)</p>	<p>If the Eligible Recipient is the Commissioner of Taxation, you consider that the information may assist the Commissioner of Taxation perform his or her duties under taxation law in relation to the FBAA or its associates.</p>
			<p>Otherwise, you have reasonable grounds to suspect that the information indicates misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of the FBAA or its associates.</p>

Appendix 2 - Whistleblower Report Form

If you wish to provide your disclosure to the Finance Brokers Association of Australasia Limited (**FBA**A), please complete this form as best as possible and submit it by email to: whistleblower@fbaa.com.au.

Date:		
<input type="checkbox"/> I consent to the use of the information in this report in accordance with Finance Brokers Association of Australasia Limited (FBA) policies and relevant laws and regulations. <i>You don't need to answer all of the below questions if you do not wish to or do not have the right Supporting Information.</i>		
<input type="checkbox"/> I wish to remain anonymous.		
<input type="checkbox"/> I would like a summary of my concerns and proposed actions to be provided to me.		
Subject Matter of Reportable Conduct (please write subject on a separate piece of paper if not enough room below): 		
No	Subject	Description/Details
1.	Location	
2.	Person(s) involved in Reportable Conduct (Please provide Name & details).	
3.	What is the nature of the Reportable Conduct?	
4.	Why do you think the information suggests that Reportable Conduct may have occurred?	
5.	Date when you suspect activity was detected:	
6.	Over what time/period has the suspect activity occurred?	

7.	How was the matter detected or how did you learn about this?	
8.	Do you have evidence or information of the Reportable Conduct?	
9.	Is the evidence in danger of being lost or destroyed?	
10.	Any know Financial Loss?	
11.	Details of others who may be witnesses/know about or have information to assist in this Reportable Conduct.	
12.	Did you receive this information second hand?	
13.	Are you concerned that a reprisal may be taken against you?	
14.	Please provide as much information as you can to assist the investigation.	

Details of Whistleblower (person lodging the Reportable Conduct) OPTIONAL

Name:

Address:

Preferred telephone no:

Preferred email address:

1. I have made or will make this disclosure to_____.
2. I believe the information I have disclosed is true.
3. I have received a copy of Finance Brokers Association of Australasia Limited (**FBA**) Whistleblower Policy. I understand this Policy (including the circumstances in which information I provide may be disclosed), with or without my consent.
4. I acknowledge that the FBA may not be able to investigate my disclosure if I wish to remain anonymous and such a wish impacts the investigation.

Signature:_____

Date:_____