Whistleblower Policy

Our commitment

Beacon Foundation Limited ("Beacon", "We", "Us" or "Our") has a long-standing commitment to conducting its business with honesty and integrity. Beacon is committed to the highest standards of conduct and ethical behaviour in all Our activities, and to promoting and supporting a culture of honest and ethical behaviour, compliance and good corporate governance.

Beacon encourages the reporting of any instances of suspected unethical, illegal, fraudulent or undesirable conduct involving Beacon's activities, and will ensure that those persons who make a report shall do so without fear of intimidation, disadvantage or reprisal.

This Policy details the framework for receiving, investigating and addressing allegations of criminal, dishonest or unethical behaviour where that behaviour concerns the activities of Beacon or current and former officers, agents, employees, volunteers and contractors of Beacon.

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1 Objectives

The objectives of this Policy are to:

(a) encourage the reporting of Reportable Conduct;

(b) ensure that individuals who disclose Reportable Conduct can do so safely and securely and in the knowledge that they will be supported and protected from victimisation, detriment and retaliation;

(c) ensure any reports of Reportable Conduct are dealt with appropriately and in a timely way;

(d) provide transparency as to Beacon's framework for receiving, handling and investigating disclosures of Reportable Conduct;

(e) afford natural justice and procedural fairness to anyone who is the subject of an allegation of Reportable Conduct;

(f) support Beacon's values, Code of Conduct and relevant policies and documents;

(g) support Beacon's long-term sustainability and reputation; and

(h) meet Beacon's legal and regulatory obligations, including but not limited to the Corporations Act 2001 (Cth) (including whistleblower protections in Part 9.4AAA), Taxation Administration Act 1953 (Cth), ASIC Regulatory Guide 270 – Whistleblower Policies, the ACNC Governance Standards, and the Privacy Act 1988 (Cth) including the Australian Privacy Principles (APPs).

2 Who can make a disclosure under this Policy?

The Policy applies to:

(a) a current or former:

  (i) employee or volunteer of Beacon; or

  (ii) director or officer of Beacon; or

  (iii) contractors and suppliers of good or service (whether paid or unpaid) and their employees; or

  (iv) an associate within the meaning of the *Income Tax Assessment Act 1936* and the *Income Tax Assessment Act 1997* (Cth)

(b) a spouse, relative or dependant of one of the people referred to at (a).

A person within these categories who makes or attempts to make a disclosure in accordance with this Policy may qualify for protection under Australian law.

3 Disclosures covered by this Policy

3.1 What is Reportable Conduct?

A Protected Disclosure is a report of **Reportable Conduct** under this Policy by an individual who has reasonable grounds to suspect any of the following conduct (or the deliberate concealment of such conduct) in relation to Beacon (including their employees or officers):

(a) conduct which constitutes an improper state of affairs or circumstances in relation to Beacon;

(b) conduct which constitutes an offence against, or a contravention of:

(i) the Corporations Act 2001 (Cth) or an instrument made under it, or other financial sector laws enforced by the Australian Securities Investments Commission (ASIC) or the Australian Prudential Regulation Authority (APRA); or

(ii) any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more; or

(c) conduct which represents a danger to the public or the financial system (even if the conduct does not involve a breach of a particular law).

These are broad concepts and accordingly, it is not possible to provide an exhaustive list of Reportable Conduct.

Examples of Reportable Conduct include:

(i) illegal conduct, such as theft, dealing in or use of illicit drugs, violence or threatened violence or criminal damage to property;

(ii) dishonesty, fraud, negligence, money laundering or misappropriation of funds;

(iii) corruption or offering or accepting a bribe;

(iv) unethical or improper conduct which raises significant implications for Beacon. This may include:

(A) serious and/or systematic breaches of Beacon's policies;

(B) bullying or harassment;

(C) misuse of sensitive or confidential information;

(D) misuse or misappropriation of donations or grant funding;

(E) falsification of program outcome data or service statistics;

(F) unfair or unethical business behaviour or practices in dealing with a client, investor, or supplier;

(v) conduct likely to damage Beacon's financial position or reputation;

(vi) victimisation for making or proposing to make a disclosure under this Policy; and

(vii) any behaviour that poses a serious risk to the health and safety of any person at the workplace, or to public health or safety, or the environment.

Conduct does not need to be illegal to constitute Reportable Conduct.

3.2 What is not Reportable Conduct?

Disclosures that relate solely to a "**personal work-related grievance**" will generally not qualify for protection under this policy or under the whistleblower protections in the Corporations Act.

Personal work-related grievances are grievances relating to a person's current or former employment with Beacon which have, or tend to have, implications for you personally and do not separately have significant implications for Beacon.

Examples of personal work-related grievances include, but are not limited to:

(a) an interpersonal conflict between the discloser and another employee or volunteer;

(b) a decision relating to the engagement, transfer or promotion of the discloser;

(c) a decision relating to the terms and conditions of your employment or engagement; and

(d) a decision to suspend or terminate the engagement of the discloser, or otherwise to discipline you.

Disclosures relating to these matters do not qualify for whistleblower protection under this Policy or Australian law.

A personal work-related grievance may still qualify for protection under this Policy if:

(a) it includes information about Reportable Conduct, or forms part of a disclosure which also includes Reportable Conduct;

(b) the disclosure is that you have suffered, or have been threatened with, a detriment for making a disclosure of Reportable Conduct; or

(c) you have made the disclosure to a legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the whistleblower protections under the Corporations Act.

4 How to make a report

4.1 Eligible Recipients of disclosures under this Policy

You must make a disclosure directly to one of the Recipients referred to in this section to qualify for protection as a whistleblower under this Policy and under Australian law.

Beacon would like to identify and address wrongdoing as early as possible. You are therefore encouraged to disclose Reportable Conduct to the dedicated Whistleblower Officer listed below, whom is an 'Eligible Recipient' of protected disclosures under the Whistleblower Laws.

Chief Financial Officer	Email: whistleblower@beaconfoundation.org.au

Alternatively, you may choose to make your report to any of the following people at Beacon, each of whom is an Eligible Recipient under the Whistleblower Laws and this policy:

- a Director or Company Secretary of Beacon;
- any member of the Executive Team;
- auditors of Beacon;
- If the disclosure relates to tax affairs, you may also report to any other employee or officer who has functions or duties relating to Our tax affairs such as the Chief Financial Officer or the Company Secretary (as Public Officer).

However, if you do not wish to raise your concern via any of the above methods, you may still qualify for protection as a whistleblower under Australian law if you:

- make a disclosure of Reportable Conduct to ASIC or any other Recipient as identified in Annexure A; or
- make a disclosure of information to an external legal practitioner for the purposes of obtaining legal advice or representation (even if the external legal practitioner concludes that a disclosure does not concern Reportable Conduct).

If you require additional information in relation to making a disclosure of Reportable Conduct, you may discuss the matter in confidence with the Chief Financial Officer.

In limited circumstances, a whistleblower may make a public interest disclosure or an emergency disclosure to a journalist or parliamentarian which qualifies for whistleblowing protection in accordance with Australian whistleblowing laws. Please see Appendix A for more details.

Reports made to people or bodies not identified in this section 6 as Eligible Recipients will **not** qualify for protection under the Whistleblower Laws or this policy. For example, the Australian Charities and Not-for Profits Commission (ACNC) is not an Eligible Recipient. You may make a report to both an Eligible Recipient (such as ASIC) and the ACNC, but you only qualify for protections under the Whistleblower Laws or this policy when you report Reportable Conduct to an Eligible Recipient.

4.2 Information you should provide

When making a disclosure under this Policy, you should provide as much information as possible, including the details of the Reportable Conduct, people involved, dates, locations and any other evidence or material which may be relevant.

A person making a disclosure under this Policy must have reasonable grounds to believe that the information they are disclosing is true, however they will still qualify for protection under this Policy and under Australian law if the information they provide turns out to be incorrect.

4.3 Anonymous reports

Beacon encourages a person to provide their name when making a disclosure under this Policy, as it will assist Us to investigate and address their report.

However, if you do not want to reveal your identity, you may make an anonymous disclosure under this Policy and may choose to remain anonymous over the course of any investigation and after the investigation is finalised.

There are various mechanisms available for protecting your anonymity when making a disclosure under this Policy, including using an anonymised email address or adopting a pseudonym for the purpose of your disclosure.

If you choose to make an anonymous disclosure under this Policy, any investigation will be conducted as best as possible in the circumstances. You may refuse to answer questions that you feel could reveal your identity at any time during the investigation or at any other time.

Disclosures which are made anonymously will still be protected under this Policy and under Australian law. However, We may be unable to provide you with the same level of practical support and protection if you do not provide your name.

If you wish to remain anonymous in making a disclosure of Reportable Conduct, you should, where possible, maintain ongoing communication with Beacon so that We can seek further information or clarification to assist in investigating and addressing your disclosure, and provide you with feedback and updates regarding the progress of any investigation and outcomes.

5 Handling and investigating a disclosure

All disclosures made under this Policy will be treated sensitively and seriously, and will be dealt with promptly, fairly and objectively.

Where you have elected to provide your name in making the disclosure, it will only be disclosed with your consent, or in exceptional circumstances where the disclosure is allowed or required by law. If you have any concerns regarding this issue, you should discuss them with the Recipient.

5.1 Initial assessment of the disclosure

Subject to the confidentiality requirements outlined in this Policy, all disclosures of Reportable Conduct made pursuant to this Policy must be referred the dedicated Whistleblower Officers listed above or, where there is a conflict of interest, directly to the Chair of the Audit & Risk Committee or another designated Director.

The Whistleblower Officer will assess the information provided and determine:

(a) whether the disclosure relates to Reportable Conduct and qualifies for protection under this Policy;

(b) whether an investigation is necessary or appropriate, taking into account whether sufficient information exists to allow the disclosure to be investigated.

Beacon may not be able to undertake an investigation in some circumstances, including if it is not able to contact the whistleblower to obtain necessary consent or information to enable an investigation to proceed in a timely manner.

All Protected Disclosures will ultimately be reported to the Beacon Board, either as part of the Whistleblower Register, or as standalone agenda items in circumstances where the Whistleblower Officer determines this is warranted or necessary.

5.2 Investigating a disclosure

Where the Whistleblower Officer is satisfied that an investigation should be conducted, the Whistleblower Officer will determine the appropriate investigation process, including:

(a) the nature and scope of the investigation;

(b) who will conduct the investigation (including whether an external investigator should be engaged);

(c) the nature of any technical, financial or legal advice that may be required; and

(d) the timeframe for the investigation (having regard to the nature and scope of the Reportable Conduct, the complexity of the issues and any other relevant factors).

All investigations will be conducted by an impartial investigator who is not involved in the alleged conduct. Beacon may appoint an external independent investigator where appropriate.

5.3 Communication with whistleblower

If you make a disclosure of Reportable Conduct under this Policy and are able to be contacted, Beacon will contact you to acknowledge receipt of your disclosure within 3 business days.

In addition, where practicable, once the matter has been passed to the Whistleblower Officer, you will be contacted within 14 business days to discuss next steps, and, where practicable, during key stages in the process such as:

- when the investigation process has begun (or if no investigation is to be conducted, to advise you of this);
- when the investigation is in progress; and
- after the investigation has been finalised;

providing that this contact does not compromise your anonymity.

In some circumstances, Beacon may be required to refer an allegation of Reportable Conduct to the Police or other agency (e.g. ASIC). In such circumstances, We may not be able to keep you informed on the progress of a Protected Disclosure.

5.4 Fair treatment

The Whistleblower Officer will ensure that any employee mentioned in a disclosure made under this Policy is not unfairly treated during the course of an investigation of Reportable Conduct.

Employees will have the opportunity to be informed of and respond to any report of Reportable Conduct made against them prior to any adverse finding being made.

5.5 Investigation findings

Beacon will apply principles of procedural fairness and natural justice to the conduct of any investigation conducted under this Policy.

Once the investigation is completed, the Whistleblower Officer will determine the recommended course of action (if any) that Beacon should take in response to the findings. Such action may include a disciplinary process or another form of escalation of the report within or outside of Beacon.

The method of documenting and reporting the findings of any investigation will depend on the nature of the disclosure. If appropriate, and subject to any applicable confidentiality, privacy or legal constraints, the Whistleblower Officer will notify the whistleblower, and any employee mentioned in a disclosure, of the outcome of the investigation. However, there may be circumstances where it is not appropriate to provide details of the outcome to the whistleblower or person mentioned in the disclosure.

Beacon will ensure that, in accordance with this Policy, publication of an investigation's findings will not breach the whistleblower's confidentiality.

6 Protections available

In order to be eligible for the protections under this Policy and under the Corporations Act, you must:

(a) be a person to who is eligible to make a protected disclosure;

(b) make a disclosure of Reportable Conduct to an Eligible Recipient or as otherwise provided in accordance with the Policy or in accordance with whistleblower laws; or

(c) or have reasonable grounds to suspect that the information relates to Reportable Conduct

The protections in this Policy apply not only to disclosures of Reportable Conduct made to Eligible Recipients, but also to:

- disclosures made to legal practitioners for the purpose of obtaining legal advice or representation regarding the operation of whistleblowing provisions under Australian law;
- disclosures to regulatory and other external bodies;

- "public interest" and "emergency" disclosures that are made in accordance with the Corporations Act.

You can still qualify for the protections even if your disclosure turns out to be incorrect, or even if you were involved in the misconduct, or your legal practitioner has advised you that your disclosure is not Reportable Conduct.

If you have made a Protected Disclosure you must, at all times during the reporting process, continue to comply with this Policy.

6.1 Identity protection

Beacon is committed to protecting the confidentiality of a whistleblower's identity. If you make a disclosure of Reportable Conduct that qualifies for protection under this Policy or under Australian whistleblower laws, Beacon and its officers and employees **cannot** disclose your identity, or information that is likely to lead to your identification, unless one of the limited exceptions under the Corporations Act applies.

Your identity, or information that could lead to your identification, may only be disclosed

(a) with your express consent

(b) to ASIC, APRA, or the Australian Federal Police;

(c) to a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to whistleblower protections; or

(d) to another person or body prescribed by the Corporations Act.

The information contained in a disclosure a person has made under this Policy may be disclosed without your consent if the disclosure of this information is reasonably necessary to investigate the issues raised in the report, provided that:

(a) the information does not include the person's identity; and

(b) all reasonable steps have been taken by Beacon to reduce the risk that your identity will be revealed from the information provided.

It is unlawful for a person to identify a whistleblower or disclose information that is likely to lead to the identification of a whistleblower, outside of the circumstances listed above.

Beacon will take all reasonable steps to reduce the risk that a person will be identified as a result of making a disclosure under this Policy and to ensure their identity remains confidential throughout the investigation process. Measures that We may take to protect a whistleblower's confidentiality include:

(a) ensuring that disclosures will be handled and investigated by qualified staff;

(b) redacting all personal information or reference to a whistleblower witnessing an event;

(c) using gender neutral terms when referring to a whistleblower;

(d) where possible, liaising with a whistleblower to identify any aspects of their disclosure that could inadvertently identify them;

(e) using secure systems for receiving, storing and transmiting information(whether electronic or paper) relating to disclosures;

(f) limiting access to information to those or investigating the disclosure;

(g) restricting access to information to staff who are directly involved in handling the disclosure ;

(h) reminding those persons handling investigations of their confidentiality obligations.

The unauthorised disclosure of a whistleblower's identity will be regarded as a disciplinary matter to be dealt with in accordance with Beacon's disciplinary procedures and may also, in some circumstances, be a criminal and civil offence under the Corporations Act.

Any concerns regarding breach of confidentiality should be raised with the Whistleblower Officer.

Beacon will handle all personal information collected under this Policy in accordance with the Privacy Act 1988 (Cth) and its Privacy Policy.

6.2 Protection from detriment

A person must not cause, or threaten to cause, detriment to a person because they have made, may make, proposes to make or could make, a disclosure that qualifies for protection under this Policy and Australian law.

Examples of detrimental conduct include dismissal, discrimination, harassment or intimidation, altering a person's position in employment to their prejudice, altering an employee's position or duties to their disadvantage, physical or psychological harm, damage to a person's property, reputation, business or financial position.

Actions that are not detrimental conduct include:

- administrative action that is reasonable for the purpose of protecting a discloser from detriment (e.g. moving a person who has made a disclosure from their immediate work area to another location where necessary to prevent detriment from occurring);
- managing a whistleblower's unsatisfactory work performance.

Beacon is committed to making sure that a person is treated fairly and does not suffer detriment for making an eligible disclosure under this Policy. Beacon may take the following measures to ensure that a person who has made a disclosure under this Policy is protected from detriment:

(a) provide a whistleblower with support services including counselling or other professional services;

(b) develop strategies to help a whistleblower minimise and manage stress, time or performance impacts, or other challenges resulting from the disclosure or investigation;

(c) allow the whistleblower to perform duties to another location;

(d) reassign or relocate the whistleblower to another role at the same or substantially the same level;

(e) make modifications to the whistleblower's workplace or way they perform their duties;

(f) develop processes for ensuring that management are aware of their responsibilities to maintain the confidentiality of disclosure, address the risks of isolation or harassment, manage conflicts, and ensure fairness when managing the performance of, or taking other management action relating to, a whistleblower;

(g) develop procedures for how a whistleblower can make a complaint if they believe they have suffered detriment and the actions Beacon will take in response to such complaints;

(h) intervene where detrimental conduct has already occurred, including investigating and taking disciplinary action, allowing the whistleblower to take extended leave, develop career development plan for the whistleblower that includes new training and career opportunities, or other compensation or remedies;

Beacon will investigate any reports of adverse action taken against a person who is eligible for protection under this Policy. If proven, those who have engaged in such behaviour may be subject to disciplinary proceedings and potential criminal and civil liability under the Corporations Act.

6.3 Whistleblower Protection Officer (WPO)

Where you have made a disclosure of Reportable Conduct which is eligible for protection under this Policy, Beacon may appoint a WPO support and help protect you if you request it or if We deems it appropriate. Beacon can only appoint a WPO where you have agreed to share your identity with the WPO.

The role of the WPO is to:

(a) safeguard the interests of a whistleblower;

(b) assess the immediate welfare and protection needs of a whistleblower and, where the whistleblower is an employee, assist in providing the whistleblower with a supportive work environment; and

(c) respond as appropriate and necessary to any concerns or reports of victimisation or detriment by a whistleblower.

The WPO must be independent of the business area subject to the disclosure and have sufficient authority to support and protect the whistleblower.

Please contact the Chief Financial Officer for more information regarding the appointment of a WPO.

6.4 Other remedies and protections

There are a number of other legal protections under Australian whistleblowing laws including compensation and civil, criminal and administrative liability protection. Please refer to Appendix A for more details.

6.5 Consequences of making a false report

Anyone who knowingly makes a false report of Reportable Conduct, or who otherwise fails to act honestly with reasonable belief in respect of the report may be subject to disciplinary action, including dismissal (in the case of employees) or professional conduct sanction (in the case of members).

The disciplinary action or sanction will depend on the severity, nature and circumstance of the false report.

7 Record keeping and accountability

Beacon's Chief Financial Officer is the officer responsible for:

(a) communicating this Policy to Beacon employees, volunteers and suppliers; and

(b) otherwise ensuring maintenance and adherence to this Policy.

Beacon will establish and maintain a Whistleblower Register which contains details of the Protected Disclosures received in accordance with this Policy.

The Chief Financial Officer will:

(a) coordinate and support the impartial investigation of Protected Disclosures;

(c) submit a quarterly summary report to Board which whilst maintaining confidentiality, provides statistics of:

(i) the number of reports received, per quarter;

(ii) for each report, the type of misconduct alleged, the level of seniority of the alleged wrongdoer and the level of perceived risk;

(iii) for each report, the time taken to investigate it;

(iv) the conclusion of each investigation (upholding or dismissing the report) and the nature of the action taken (such as disciplinary action).

(b) periodically review the Whistleblower Register to ensure that proper processes are being followed.

8 Availability of this Policy

The Policy will be made available on Beacon website which can be accessed at www.beaconfoundation.org.au.

The Chief Financial Officer must ensure all employees are aware of and understand their obligations under this Policy.

All new employees and volunteers must be made aware of this Policy as part of their induction training.

9 Monitoring and Review

This policy will be reviewed periodically to ensure it remains effective and complies with the Whistleblower Laws.

Beacon may amend this policy at any time on the advice of the Whistleblowing Officers. Material changes to the policy, including substantial updates as an outcome of periodic reviews, will be approved by the Executive Leadership Team and endorsed by the Board.

The Whistleblowing Officers must maintain a register of any changes to the policy and provide of copy of this register to the Board following any change.

Appendix A

WHISTLEBLOWER PROTECTIONS UNDER AUSTRALIAN LAW

A whistleblower who discloses specified information to certain people or organisations is protected by Australian law.

Examples of this information and recipients are outlined in the following table:

Information reported or disclosed	Recipient of disclosed information
Information about actual or suspected misconduct, or an improper state of affairs or circumstances in relation to Beacon. This includes information that Beacon or any officer or employee of Beacon has engaged in conduct that: • contravenes or constitutes an offence against the following Commonwealth legislation: Corporations Act; Australian Securities and Investments Commission Act 2001; Banking Act 1959; Financial Sector (Collection of Data) Act 2001; Insurance Act 1974; Life Insurance Act 1973; National Consumer Credit Protection Act 2009; and Superannuation Industry (Supervision) Act 1993); • represents a danger to the public or financial system; • constitutes an offence against any law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more. Note that personal work-related grievances are not protected disclosures under the law, except as noted below.	• an officer or member of the Executive Team of Beacon; • an auditor or member of an audit team conducting an audit of Beacon; • ASIC or APRA; • a legal practitioner for the purpose of obtaining legal advice or legal representation regarding the operation of the legal provisions under the Corporations Act.
Information that may assist the Commissioner of Taxation to perform his or her functions under a taxation law in relation to Beacon.	• Commissioner of Taxation
Information about misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of Beacon, including GST, PAYG, FBT or DGR compliance, reporting obligations or other matters covered by federal taxation laws	• Beacon's auditor, or a member of an audit team conducting an audit of Beacon, a director, secretary or senior manager of Beacon. • An employee or officer of Beacon or a related entity who has functions or duties that relate to the tax affairs of Beacon.

It is important to note that a disclosure must be made directly to one of the above specified recipients in order to qualify for protection as a whistleblower under Australian law.

The law also protects certain disclosures made in "emergency" and "public interest" circumstances, which allows for the disclosure to be made to a journalist or parliamentarian. It is important that you understand the criteria for making a disclosure in these circumstances, which includes, among other things:

- that you have first made the disclosure to ASIC, APRA, ATO or other prescribed body, or a legal practitioner; and
- you have provided written notice to that entity that you now intend to make a public interest or emergency disclosure in relation to this issue. In the case of public interest disclosures, at least 90 days must have passed since your original disclosure.

A disclosure to Beacon alone does not satisfy the requirement. You should seek independent legal advice before making a "public interest" or "emergency" disclosure.

Protections and remedies available under Australian law

In addition to the protections specified in this Policy, additional legislative protections may also be available to eligible whistleblowers, including but not limited to:

- compensation for loss, damage or injury suffered as a result of detrimental conduct arising from making a disclosure or where an entity failed to take reasonable cautions and exercise due diligence to prevent the detrimental conduct;
- an injunction to prevent, stop or remedy the effects of the detrimental conduct;
- an order requiring an apology for engaging in the detrimental conduct;
- if the detrimental conduct wholly or partly resulted in the termination of an employee's employment: reinstatement to their position; and
- any other order the court thinks appropriate.

The law also states that if you make a protected disclosure:

- in some circumstances (e.g. if the disclosure has been made to a regulator) the information you provide is not admissible in evidence against you in criminal proceedings or in proceedings for the imposition of a penalty, other than proceedings in respect of the falsity of the information;
- you are protected from liability in relation to your disclosure:
    - civil liability (e.g. any legal action against you for breach of an employment contract, duty of confidentiality or other contractual obligation);
    - criminal liability (e.g. attempted prosecution for unlawfully releasing information, or other use of your disclosure against you in a prosecution (other than for making a false disclosure); or
    - administrative liability (e.g. disciplinary action for making the disclosure); and
- no contractual or other remedy may be enforced or exercised against you based on the disclosure.

You are encouraged to seek independent legal advice in relation to these matters.

Version Control Table

Version	Date	Author	Purpose/Change
1	07/09/2020	Amy Jaffer (HR Coordinator)	Reviewing the policy and using the correct template
2	07/09/2022	Karen Wheelton	Review Policy
3	15/02/2026	Brent Walker, CFO	Policy review and update to align with updated regulatory guidance and market best practice