AUSTRALIAN EATWELL PTY LTD

Grievance and Whistleblowing Policy

Aligned to SMETA, ILO core conventions, the Fair Work Act 2009 (Cth), Part 9.4AAA of the Corporations Act 2001 (Cth) and relevant Australian Standards

Item	Detail
Document owner	Office Manager
Approved by	Managing Director
Version	2.0
Effective date	29.10.2026
Next scheduled review	12 months from effective date
Applies to	All permanent, fixed-term and casual employees, apprentices and trainees, migrant and visa-holding workers, and the other people listed in Section 2

1. Purpose

This policy gives every worker, and anyone else connected to Australian Eatwell Pty Ltd ("the Company"), one fair, accessible, safe and confidential way to raise a concern — whether it is a personal workplace grievance or a report of wrongdoing — free from interference, discrimination or retaliation.

It combines the Company's Grievance Policy and Confidential Whistleblowing Procedure. Every concern comes in through the same channels (Section 7) and follows the same steps (Section 8). There are two types of concern:

- **Personal grievance:** a concern about your own employment, working conditions, treatment or workplace relationships. Management handles it.
- **Serious concern (whistleblowing report):** a report of misconduct, illegal or unsafe conduct, or other wrongdoing by the Company, its people or its suppliers. The Managing Director leads it, with the extra protections in Section 9.

All concerns are received, investigated and resolved by the Company's own people. No external hotline, investigator or other third party is engaged to handle them. This does not limit anyone's legal right to go to a regulator or other outside body (Section 10).

This policy gives practical effect to the Company's commitments under SMETA's four pillars (Labour Standards, Health & Safety, Environment and Business Ethics), the ILO core conventions, the Fair Work Act 2009 (Cth) and applicable Australian Standards, and forms part of the Company's broader Ethical Trade and Human Rights Due Diligence framework.

Freedom of association and collective bargaining rights are set out in full in the Company's Child Labour Prohibition & Right to Collective Bargaining Policy, which is the Company's single, consolidated standard on that topic. A concern about union membership, interference or bargaining is raised through the channels in this policy and handled under the substantive standards in that policy.

2. Scope

This policy applies at all sites, on all shifts and to all forms of engagement. The following people can raise a concern under it:

- Current and former permanent, fixed-term and casual employees, including those hired directly at the gate in their first days of work
- Apprentices and trainees
- Migrant workers, including those on temporary visas (e.g. subclass 482, 417, 494 or student visas)
- Current and former officers and managers
- Suppliers and their employees, about conduct connected to the Company's operations or supply chain

- Relatives, dependants and spouses of any of the above
- Job applicants, visitors, community members and worker representatives (including union officials). The Company extends its own non-retaliation commitment to them even where the statutory whistleblower protections do not apply

The Company hires all workers directly and does not currently use labour-hire agencies or on-site contractors. If it ever does, this policy applies to those workers in full, and Section 7.3 sets out how they must be informed of it.

The policy covers concerns about conduct by managers, supervisors, co-workers, suppliers, visitors or anyone else met in the course of work.

3. Standards and legal framework

This policy is the Company's operative, auditable standard for workplace grievances and whistleblower disclosures. It is designed to meet or exceed:

Framework	Key relevant provisions
Fair Work Act 2009 (Cth)	General protections (Part 3-1, including s.340 adverse action); unfair dismissal protections
Corporations Act 2001 (Cth), Part 9.4AAA	Whistleblower protections: who qualifies, eligible recipients, confidentiality of identity, protection from detriment, immunity and compensation
Taxation Administration Act 1953 (Cth), Part IVD	Equivalent protections for disclosures about tax affairs
Occupational Health and Safety Act 2004 (Vic)	No discrimination against workers who raise health and safety concerns
Equal Opportunity Act 2010 (Vic)	Prohibits discrimination and victimisation for making a complaint
Modern Slavery Act 2018 (Cth)	Remediation and grievance expectations for modern slavery risks
Migration Act 1958 (Cth) and visa conditions	Protection of migrant workers who report workplace issues from visa-related reprisal
Privacy Act 1988 (Cth)	Handling of personal information in reports, investigations and records
SMETA 4-Pillar Methodology and ETI Base Code	Labour Standards pillar — grievance mechanism, non-discrimination, no harsh or inhumane treatment; Business Ethics pillar — access to remedy
ILO Convention 111	Discrimination (Employment and Occupation) Convention
ILO Convention 155 / AS/NZS ISO 45001:2018	Occupational health and safety — safe reporting of hazards without reprisal
AS/NZS ISO 10002:2018	Complaints handling — guidelines for organisations

4. Definitions

Term	Meaning
Concern	Any grievance or disclosure raised under this policy.
Personal grievance	A concern, problem or complaint raised by a worker about their own employment, working conditions, treatment or workplace relationships (for example, a roster, pay or performance decision affecting only them).

Term	Meaning
Serious concern (whistleblowing report)	A report, made on reasonable grounds, of misconduct, an improper state of affairs, illegal or unsafe conduct, or a serious breach of Company policy, by the Company, its people or its suppliers. A personal grievance is also treated as a serious concern if it involves retaliation for speaking up or a breach of law. A report only needs reasonable grounds; proof is not required.
Worker representative	A person freely chosen by workers (including a union delegate or official) to represent their interests, including in a grievance or disclosure.
Victimisation, retaliation or detriment	Any adverse, detrimental or punitive action, or threat of it, taken against someone because they raised, supported or took part in a concern, or exercised a workplace right. Section 12 lists examples.
Vulnerable worker	A worker at heightened risk of exploitation or with reduced bargaining power, including migrant and visa-holding workers, workers with limited English, workers new to Australia or to the workforce, and workers with disability.
Protected attribute	Race, colour, caste, national origin, social origin, religion, age, disability, gender, pregnancy, marital status, sexual orientation, union membership or political affiliation.

5. Guiding principles

1. **Non-discrimination:** every worker may use this policy on equal terms, regardless of any protected attribute.
2. **Accessibility:** channels work for people of all literacy levels, language backgrounds and abilities.
3. **Confidentiality:** information is shared only on a need-to-know basis, subject to natural justice; a whistleblower's identity is protected as Section 11 sets out.
4. **No retaliation:** raising a concern on reasonable grounds will never result in disadvantage.
5. **Timeliness:** concerns are acknowledged and resolved within defined timeframes.
6. **Impartiality:** concerns are investigated by people free of any conflict of interest.
7. **Right to representation:** workers may be supported and represented by a union delegate or worker representative of their choosing at any stage.
8. **Continuous improvement:** data from concerns is analysed to find and fix systemic issues.

6. What can be raised, and what type of concern it is

If in doubt, raise it. You do not need to decide the type yourself: Management (or the Managing Director) decides at step 2 of Section 8, tells you which applies, and all protections apply while that happens.

Area	Examples	Usual type	Related Company policy
Your own pay, hours and conditions	Roster disputes, leave, a pay error affecting only you, workload, facilities	Grievance	Relevant modern award; Employment Contract
Treatment at work	Unfair treatment, conflict with a supervisor or co-worker, bullying, harassment, discrimination	Grievance (serious if systemic)	Anti-Discrimination, Bullying and Harassment Policy
Child and young workers	Anyone under 18 working on site or for a supplier; false identity or age documents	Serious	Child Labour Prohibition & Right to Collective Bargaining Policy

Area	Examples	Usual type	Related Company policy
Freedom of association	Threats, discrimination or dismissal for joining or talking about a union; blocking worker representatives; interfering with a bargaining request	Serious	Freedom of association Policy
Recruitment and hiring	Any fee, deposit or "favour" charged to get a job or shift; withholding passports or ID; false promises about pay or conditions; hiring outside the direct recruitment process	Serious	Ethical Recruitment Policy
Forced labour and modern slavery	Debt bondage, restricted movement, threats, confiscated wages, forced overtime, trafficking indicators, at the Company or a supplier	Serious	Modern Slavery & Human Trafficking Policy; Supplier Code of Conduct
Health, safety and emergencies	Unsafe plant or practices, heat stress, blocked exits, unreported injuries, ignored emergency procedures	Either, by seriousness	Work Health & Safety Policy; Emergency Preparedness & Heat Safety Plan
Food safety and integrity	Falsified food safety records, undeclared allergens, mislabelling (including "plant-based" claims), contaminated product released	Serious	Food safety and quality system
Fraud and corruption	Theft, bribery, kickbacks, false invoicing, falsified audit records, tax evasion	Serious	Code of Conduct / Business Ethics Policy
Environment	Illegal discharge, waste dumping, breach of an EPA licence	Serious	Environmental obligations
Retaliation	Any detriment, threat or pressure against someone who has raised or might raise a concern	Serious	This policy

7. How to raise a concern

You can use any channel below, in any language, verbally or in writing. You do not have to go to your supervisor first, and you never have to raise a concern with the person it is about.

7.1 Channels

Channel	How to use it	Anonymous option
Supervisor or manager	Verbal or written, face to face. Best for everyday issues you are comfortable raising directly	No
Office Manager	Anu Hitihamillage, in person, by phone 03 5497 2188 or email info@australianeatwell.com.au	Yes
Managing Director	Nathan Harris, 0417 139 105, nathan@australianeatwell.com.au — in person, away from the production floor if preferred. The main contact for serious concerns.	Confidential; identity protected
Worker representative	Raises the concern on your behalf with the Managing Director	Optional
Confidential internal line	Dedicated email info@australianeatwell.com.au and anonymous feedback form.	Yes

Channel	How to use it	Anonymous option
Suggestion Box	Locked box at staff room, checked daily by 2 management staff.	Yes

Supervisors and managers who receive a concern they cannot resolve informally, or any report of wrongdoing, must pass it within one working day to HR, or to the Managing Director if it is a serious concern or involves HR. They must not investigate wrongdoing themselves, tell anyone else, or discourage a worker from raising a concern formally.

Anonymous concerns. You can raise a concern without giving your name, stay anonymous throughout, and refuse to answer questions that might identify you. Anonymous whistleblower disclosures are still protected by law. Using the confidential internal line or a pseudonymous email address lets the Company ask follow-up questions and update you. Full anonymity may sometimes limit how far a matter can be investigated.

What to include, if you can

- What happened, when and where
- Who was involved and who else saw it
- Any evidence: photos, documents, messages (do not break the law or Company rules to get evidence)
- Whether you are worried about your safety or about retaliation

7.2 Making the channels accessible

Recognising the diversity of the workforce, including migrant and visa-holding workers common in food manufacturing, the Company will:

- Publish this policy, its summary (Section 19) and the concern form (Appendix A) in the top languages spoken by the workforce, identified each year through a language needs survey.
- Provide interpreting at no cost at any stage, using nominated bilingual staff who have no connection to the matter or work area, who sign the confidentiality undertaking (Appendix B), and whom the worker may refuse. A supervisor is never used as an interpreter. If no suitable staff interpreter is available, or Auslan is needed, the Company arranges a professional interpreter bound by confidentiality, at its cost.
- Accept verbal or audio-recorded concerns from workers with low literacy, and provide accessible formats (large print, plain English) for workers with disability.
- Display plain-language summaries with visual icons and contact details on noticeboards in all common areas (lunchrooms, locker rooms).
- Tell migrant and visa-holding workers, at induction and every year, that raising a concern carries no risk to their visa status, and that the Company will never report, threaten to report, or use immigration status as leverage against a worker.
- Ensure no worker pays a fee, forfeits leave or uses unpaid personal time to raise or pursue a concern.

7.3 Verifying reach and effectiveness

Delivering training and publishing channels is not, by itself, evidence that the mechanism is genuinely accessible. The Company will run an annual Accessibility and Awareness Audit covering:

- **Coverage mapping:** identifying every worker group on site — including night and rotating shifts, seasonal or peak-season workers, and workers absent from group induction — and confirming each has received the policy in an accessible form.
- **Other workers on site:** if labour-hire workers or contractors are ever engaged, the Company will deliver its own briefing on this policy (not rely on an agency's generic policy) and spot-check that they know how to raise a concern.
- **Comprehension spot-checks:** HR anonymously samples workers across languages, shifts and worker types (through the training questionnaire, short interviews or a pulse survey) to confirm they can say how and where to raise a concern.
- **Disability and assistive-technology access:** checking that the online form and voicemail work with common assistive technologies, and that signage meets accessible design standards (contrast, font size, pictograms).

- **Gap remediation:** any group, shift or language with low awareness or access is recorded as a corrective action in the Concerns Register (Section 14), with a named owner and completion date, and re-tested at the next cycle.
- **Reporting:** findings and corrective actions go to senior management (Section 15) and are available to SMETA or other ethical auditors on request.

8. How concerns are handled

Every concern follows the same steps and timeframes. HR manages the process. Serious concerns are led by the Managing Director, with the extra protections in Section 9.

8.1 Stage 1 — Informal resolution (personal grievances only)

Where safe and appropriate, workers are encouraged (but never required) to first raise a personal grievance with their supervisor or a worker representative. The supervisor must acknowledge it within 2 working days and try to resolve it within 5 working days. Serious concerns always go straight to Stage 2.

8.2 Stage 2 — Formal procedure

If the matter is not resolved informally, the worker prefers a formal process, or it is a serious concern (including discrimination, harassment or victimisation), it is handled as follows. A concern may be raised through any channel in Section 7.

Step	Action	Timeframe
1	Log the concern in the Concerns Register under a case number and acknowledge it in writing (where contact details exist). For a serious concern, hold the person's identity separately	Within 2 working days of receipt
2	Decide whether it is a personal grievance or a serious concern; check for any immediate danger (Section 9) and any risk of retaliation, and put a protection plan in place if needed; assign an impartial investigator. The worker may object to a proposed investigator on conflict-of-interest grounds	Within 3 working days
3	Investigate, including interviews with relevant people and, where requested, the worker's representative present. Give anyone named a fair chance to respond (Section 13)	Within 15 working days (extendable with written reasons; the worker is updated at least every 2 weeks while extended)
4	Give the worker a written outcome, with reasons and any corrective action. For a serious concern, the outcome is shared to the extent appropriate without revealing confidential information about others	Within 5 working days of the investigation ending
5	Worker may lodge an appeal	Within 10 working days of receiving the outcome
6	Appeal reviewed by a manager or director not involved in the original decision	Within 15 working days
7	Check with the worker that they have not suffered retaliation (serious concerns, and any grievance where a risk was identified)	At 3 and 6 months after closure

If a personal grievance turns out to involve a serious concern, HR passes it to the Managing Director with the worker's knowledge, and the extra protections in Section 9 apply from that point.

9. Serious concerns (whistleblowing reports)

Serious concerns follow the same steps as Section 8, with these additions. No separate whistleblower officer or in-house lawyer is needed: the Managing Director, as a director of the Company, can receive whistleblowing reports with the full legal protections that apply under the Corporations Act.

- **Who leads it:** the Managing Director leads every serious concern, supported by Management. If the concern involves management, the Managing Director handles it without the management.
- **Identity protection:** the person's identity, and anything likely to identify them, is known only to the Managing Director and the investigator unless the person agrees otherwise (Section 11).
- **Immediate danger:** where there is immediate risk — for example, a child found working, a sign of trafficking or forced labour, or an imminent safety hazard — act at once: remove the person from harm, notify police (000 or AFP 131 237) or WorkSafe where the law requires it, and preserve evidence. Child labour cases follow the remediation steps in the Child Labour Prohibition & Right to Collective Bargaining Policy.
- **Investigator:** a manager or trained staff member with no connection to the people or work area concerned.
- **Suppliers:** where the concern involves a supplier, the Managing Director verifies it (including by an unannounced visit by Company staff where needed), agrees a corrective action plan with the supplier in line with the Supplier Code of Conduct, and never reveals the person's identity to the supplier. Ending the relationship is a last resort where remediation fails, considering the impact on affected workers.
- **Conflicts of interest:** anyone named in, or close to, a concern must not receive, investigate or decide on it.

10. Your right to raise concerns outside the Company

The Company encourages concerns to be raised internally first so they can be fixed quickly. However, anyone may, at any time and without penalty, take a concern to an outside body. The Company will not treat this as a breach of loyalty or confidentiality, will not discourage or question anyone for doing so, and will cooperate fully with any external investigation.

Body	Matters
Fair Work Ombudsman (13 13 94)	Workplace rights, underpayment, unlawful deductions, general protections, freedom of association
Fair Work Commission	Unfair dismissal, general protections disputes
Australian Human Rights Commission / Victorian Equal Opportunity and Human Rights Commission	Discrimination and harassment
WorkSafe Victoria (13 23 60)	Health and safety
ASIC	Corporate misconduct and breaches of corporations law
Australian Taxation Office	Tax misconduct
Australian Federal Police (131 237)	Forced labour, trafficking, slavery
Victorian Department of Health / local council	Food safety
Your union	Any workplace concern
A customer's ethical trade helpline or SMETA-recognised grievance mechanism	Where a buyer of the Company's products provides one

Anyone may also get their own independent legal advice about their rights at any time, and doing so is protected.

11. Confidentiality

Information about any concern is shared strictly on a need-to-know basis, and personal information is handled in line with the Privacy Act 1988 (Cth). For serious concerns, the identity of the person who raised it, and any information likely to identify them, is not disclosed without their written consent, except as the law allows.

Confidentiality controls

1. The identity of a person who raised a serious concern is disclosed only with their consent, or where the law requires it (for example, to police or a regulator).
2. Information that could identify the person is shared only where reasonably necessary to investigate, and only after all reasonable steps are taken to remove identifying details.
3. Concerns are logged under a case number; the names of people who raise serious concerns are kept in a separate restricted record held by the Managing Director.
4. Files are kept in digital form with restricted access. (Management for personal grievances; the Managing Director and the investigator for serious concerns).
5. Interviews are held away from the production floor and outside shift-change times where possible, so attendance is not noticed.
6. Emails use case numbers, not names, in subject lines; documents are marked "Confidential".
7. Everyone who handles a serious concern, and every staff interpreter, signs the confidentiality undertaking (Appendix A). Unauthorised disclosure of the person's identity is a serious disciplinary matter and may be an offence under the Corporations Act.
8. Gossip, speculation or attempts to identify a person who raised a concern are themselves a breach of this policy.

12. Protection from retaliation and detriment

No one will be disadvantaged for raising a concern on reasonable grounds, supporting someone else's concern, acting as a witness, or exercising any right under this policy. Anyone found to have retaliated faces disciplinary action up to and including dismissal, and may face criminal and civil penalties.

Detriment includes dismissal, demotion, reduced shifts or hours, disciplinary action, changed duties or roster to the worker's disadvantage, harassment, intimidation, exclusion, damage to reputation, property or finances, threats (including threats to family, visa status or future employment), blacklisting, and for suppliers, contract termination or reduced orders. It also includes any threat of these.

How the Company protects people who raise concerns

- Management (or the Managing Director for serious concerns) assesses the risk of retaliation at step 2 and records a protection plan where the risk is more than low
- Interim measures may include changed reporting lines, adjusted shifts or location (only with the person's agreement and never as a disadvantage), and monitoring of their rosters and pay
- A nominated internal support person who is not involved in the matter
- Any allegation of detriment is treated as a new, priority serious concern and investigated separately
- A person who was involved in the misconduct is protected for reporting it, though not for their own conduct; their cooperation will be taken into account

Legal protections. An eligible whistleblower is protected from civil, criminal and administrative liability (including disciplinary action) for making the disclosure, and may seek compensation and other remedies through the courts if they suffer detriment. Workers also have general protections under the Fair Work Act against adverse action for making a complaint.

13. Outcomes, remediation and fair treatment

Substantiated concerns lead to action that stops the problem, puts right the harm to affected workers and prevents it happening again. People named in a concern are treated fairly and presumed innocent until findings are made.

Possible outcomes

- Disciplinary action, up to dismissal, under the Disciplinary Policy

- Remediation for affected workers — for example, back-payment of underpaid wages, repayment of any recruitment fees charged (by the Company or a supplier), return of withheld documents, safe exit and support for any child found working
- Supplier corrective action plan, verification and, as a last resort, responsible exit
- Changes to systems, controls, training or policy to fix the root cause
- Notification to regulators or police where required by law or where a crime may have been committed
- Inclusion, in anonymised form, in the annual ethical trade and (where applicable) modern slavery reporting

Fair treatment of people named in a concern

1. They are told the substance of the allegations before any adverse finding, and given a reasonable chance to respond.
2. They may bring a support person or worker representative (not a witness to the matter) to interviews, and use an interpreter.
3. Their identity is also kept confidential as far as possible.
4. They may have a nominated internal support person.
5. Standing down during an investigation is a precaution, on full pay, not a finding of guilt.
6. Where allegations are not substantiated, they are told, and no record of the allegation is placed on their personnel file.

Unsubstantiated or vexatious concerns

Every concern is presumed to be raised in good faith and is investigated on its merits before any view is formed about its substance. A concern raised honestly but not substantiated is never treated as vexatious and remains fully protected. A concern is found to be vexatious or malicious only where an investigation establishes, on the evidence, that it was knowingly fabricated or made with intent to harm another person.

Such a finding is dealt with under the Disciplinary Policy, with the same fair process, right to representation and right of appeal as any other disciplinary matter. It is recorded separately from the Concerns Register and does not affect how any other concern from the same person is handled.

14. Records and corrective action

- All concerns are logged in a single, confidential Concerns Register recording: case number, type of concern, date received, channel, category (Section 6), risk rating, investigator, key dates, outcome and corrective or preventive action. Identities of people who raise serious concerns are held separately by the Managing Director.
- Records are kept securely for at least seven years after the matter is closed, then securely destroyed in line with the Company's data retention schedule and the Privacy Act 1988 (Cth).
- Anonymised register data (numbers, categories, time to close, outcomes) is available to SMETA and other ethical auditors on request. Individual serious-concern case files are not shared with auditors without the reporter's consent.

15. Roles and responsibilities

Role	Responsibilities
Managing Director	Lead every serious concern and any concern involving Management; protect the identity and welfare of people who raise them; approve and resource this policy; receive quarterly reports; approve corrective actions; report to the owners
Office Manager (document owner)	Keep this policy current; coordinate the annual review and the Accessibility and Awareness Audit
Admin / Management	Receive and administer all concerns; manage the Concerns Register, confidential internal line and speak-up box; arrange interpreters and investigators; ensure timeframes are met; monitor rosters and pay of people who raised concerns for signs of retaliation

Role	Responsibilities
Investigators	Managers or trained staff with no connection to the matter, who investigate impartially, promptly and on the evidence; keep records; report findings without identifying a person who raised a serious concern
Supervisors and managers	First point of contact for informal resolution; pass on concerns within 1 working day; never investigate wrongdoing themselves, identify a whistleblower or discourage a formal concern
Worker representatives' / union delegates (If any)	Support and represent workers raising or responding to a concern
All workers	Raise concerns in good faith; cooperate with investigations; keep matters confidential; never retaliate

In a business of the Company's size, one person may hold more than one role (for example, the Office Manager may also be HR).

16. Training and communication

Audience	Content	When
All workers	How and where to raise a concern, the two types of concern, anonymity, protection from retaliation and visa reassurance — verbal, in the worker's language, with the pictorial summary	At induction (day one for walk-in hires); refreshed every year and whenever the policy is materially revised, via toolbox talks
Supervisors and managers	Impartial grievance handling, recognising a disclosure and passing it on, anti-discrimination law, confidentiality and non-retaliation	At induction or appointment; refreshed every 12 months (documented)
Management, the Managing Director, investigators and staff interpreters	Legal requirements, confidentiality, trauma-informed interviewing, investigation practice, record keeping	On appointment and every 2 years
Suppliers	How to use the confidential internal line, and non-retaliation expectations, through the Supplier Code of Conduct; suppliers asked to display the speak-up poster for their own workers	At onboarding and contract renewal

This policy is displayed prominently at all sites and reissued whenever a change in law or standards requires an update.

17. Monitoring, audit and review

The Concerns Register is reviewed quarterly by Management and the Managing Director to identify systemic or recurring issues. The quarterly report covers:

- Number of concerns by type, channel and category, and how many were anonymous
- Average time to resolution and the percentage resolved within the stated timeframes
- Outcomes, remediation delivered and recurrence of systemic issues
- Any allegations of detriment and their result
- Trends pointing to wider risks (e.g. a cluster of recruitment-fee reports linked to one supplier)

A period with no concerns is reviewed too: it may mean workers do not know about, or trust, the channels. Worker satisfaction with the process and trust in it are assessed once a year through an anonymous worker survey or worker committee feedback.

This policy and the register are internally audited at least once a year and are subject to external audit as part of SMETA and customer ethical trade audits. The policy is formally reviewed at least every 12 months, or earlier after a change in law (including any outcome of the current Treasury review), ILO conventions, SMETA methodology or Australian Standards, an audit finding, or a significant trend in concerns.

18. Related documents

- Child Labour Prohibition & Right to Collective Bargaining Policy — the Company's single, consolidated standard for freedom of association, collective bargaining and child labour; this policy is the channel for reporting any breach of it
- Ethical Recruitment Policy
- Modern Slavery & Human Trafficking Policy
- Supplier Code of Conduct
- Code of Conduct / Business Ethics Policy
- Disciplinary Policy — the operative standard for disciplinary outcomes, including any finding of a vexatious or malicious concern under Section 13
- Anti-Discrimination, Bullying and Harassment Policy
- Work Health & Safety Policy and Emergency Preparedness & Heat Safety Plan
- Migrant and Visa Worker Protection Procedure
- Food, Beverage and Tobacco Manufacturing Award 2020 and Storage Services and Wholesale Award 2020

19. Policy summary at a glance

A plain-language summary for quick reference, toolbox talks and noticeboard display. It does not replace the full policy.

Your rights

- You can raise any concern without fear — no one will be punished, lose shifts, or have their visa threatened for speaking up.
- You can use any language, get a free interpreter, and raise a concern anonymously if you prefer.
- You can bring a union delegate or worker representative with you at any stage.
- You can take a concern to the Fair Work Ombudsman, WorkSafe, the Human Rights Commission or another outside body at any time.

How to raise a concern

1. Tell your supervisor, Management, the Managing Director or a union delegate — or use the confidential line or speak-up box.
2. You get an acknowledgement within 2 working days.
3. Management looks into it fairly and confidentially, usually within 15 working days. Reports of serious wrongdoing are led by the Managing Director, with your identity protected.
4. Whoever investigates has no connection to the matter.
5. You are told the outcome in writing, and you can appeal within 10 working days.

Making sure nobody is left out

- Every year, Management checks that all workers — including night shift and seasonal staff — actually know how to raise a concern.
- Any gap is logged as a corrective action with an owner and a deadline, and re-checked.

Key contacts

Management: Anu Hitihamillage 0433 429 656 · Managing Director: Nathan Harris 0417 139 105 · Confidential line:03 5497 2188 info@australianeatwell.com.au

Approved by	Signature	Date
Managing Director	Nathan Harris	29.10.2026

Appendix A — Confidentiality undertaking

To be signed by everyone who receives, handles or investigates a serious concern, and by every staff interpreter:

> *I understand that I am handling a confidential matter [case number] under the Grievance and Whistleblowing Policy. I will not disclose the identity of the person who raised it, or information likely to identify them, to anyone except as permitted by that policy and the law. I will keep all records secure, discuss the matter only with authorised people, and not take or threaten any action that could cause detriment to them. I understand that a breach may lead to disciplinary action, including dismissal, and may be an offence under the Corporations Act 2001 (Cth).*

Name: _____

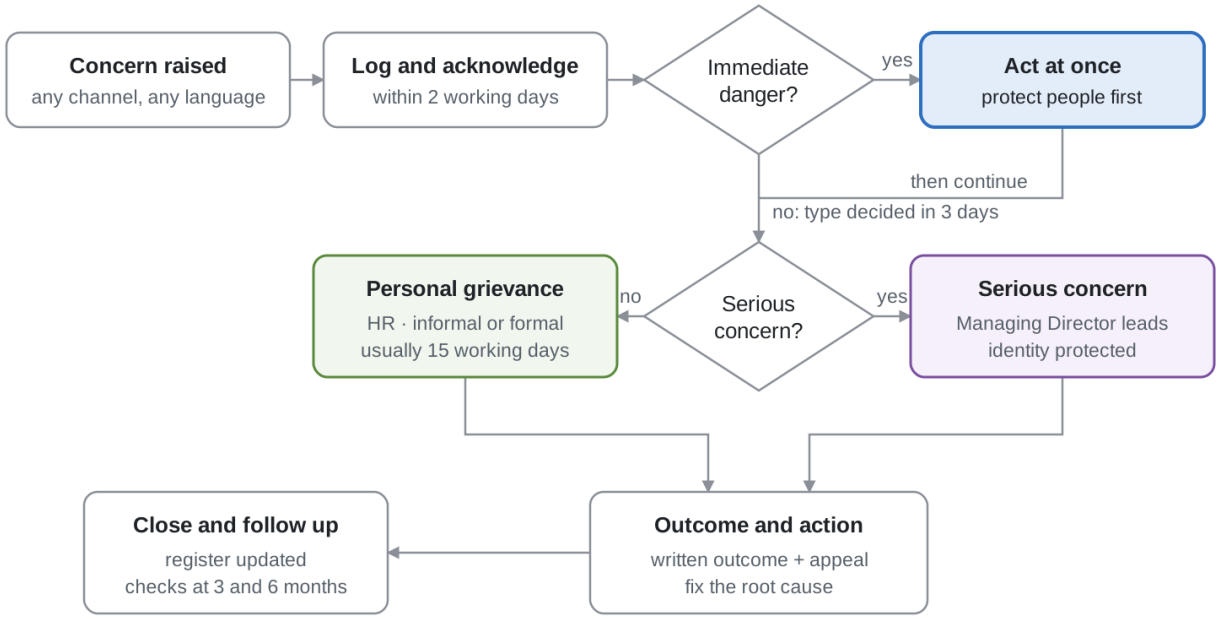
Position: _____

Signature: _____

Date: _____

Appendix C — Process flowchart

Same steps for every concern; serious concerns get extra protection



Immediate dangers are dealt with first. Every concern then follows the same steps: personal grievances are handled by HR, and serious concerns are led by the Managing Director with the person's identity protected. Both end in a written outcome, a right of appeal and follow-up checks for retaliation.