



Bradken Policy

Compliance Reporting (Whistleblowing)

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C09971

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1 Purpose

Bradken actively encourages everyone associated with our business to report any behaviour which they believe is unlawful or inconsistent with our Code of Conduct or our values. All such reports will be handled properly and diligently, with the objective of correcting any behaviour found to be unacceptable and putting in place measures to prevent recurrence.

2 Scope

This Policy applies to all Bradken group companies, business units and functional groups in all geographical locations, and all of their directors, officers, employees, contractors, suppliers, consultants and other business partners.

3 Reporting of behaviour

3.1 What types of behaviour should be reported?

Bradken encourages all employees, contractors, suppliers, consultants and others associated with our business to report any behaviour which they believe is:

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- illegal;
- fraudulent;
- dishonest;
- corrupt;
- unethical;
- unsafe; or
- contrary to Bradken’s values or Code of Conduct, or is otherwise inappropriate.

3.2 How should concerns be reported?

Such conduct, or suspected conduct, may be reported by using Bradken’s online Ethicspoint portal, or by calling the compliance hotline, or by contacting Bradken’s Human Resources department, line management or executive management.

Bradken’s Ethicspoint and compliance hotline contact details are set out in the Appendix.

4 Handling of reports

4.1 Reports to be acknowledged

Where possible, reports shall be acknowledged and the reporter informed that the matter will be investigated.

4.2 Prompt investigation and management

All reports made under this Policy shall be treated seriously and shall be investigated promptly.

4.3 Conflicts of interest

If a report alleges misconduct by a person who would ordinarily be involved in investigating that report and/or deciding any action to be taken, then that person should generally not be involved in the investigation or decision.

Any report alleging misconduct by Bradken’s Chief Executive Officer should be referred to Hitachi Construction Machinery compliance reporting line. Contact details are set out in the Appendix.

5 Anonymity and Confidentiality

Reports may be made anonymously. Anonymous reporters may be asked if they wish to identify themselves to aid the investigation. However, if they decide to remain anonymous then that decision shall be respected, and no attempt shall be made to identify them.

In any case, if the person making a report wishes, their identity shall be protected and disclosed only to the extent necessary for the investigation or as required by law.

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6 Protection for people who make reports under this Policy

Where a person, acting in good faith, makes a report in accordance with this Policy, then that person will not be subject to any kind of retaliation. This is in addition to any legal protections the person may be entitled to. “Retaliation” means subjecting a person to unfavourable treatment because that person has reported suspected wrongdoing as set out in this Policy.

A person making a report under this Policy may request certain protection such as relocation or leave of absence during the investigation, for example where it is not possible to maintain anonymity. Such requests will be considered according to the circumstances in each case, with appropriate regard for the interests of the people involved.

7 Appendix

7.1 Ethicspoint contacts

Web site URL: bradkengroup.ethicspoint.com

Mobile site URL: bradkengroupphone.ethicspoint.com

Country	Telephone Number
Australia	1800 975 159
Canada	1 844 745 8317
China	400 120 5100
India	022 5097 2599
Malaysia	1 800 81 0707
Peru	0800 74885
South Africa	087 195 1169
United States	1 844 745 8317

7.2 Bradken internal contacts

Email address: whistleblower@bradken.com

Hotline phone number: +61 1800 272 3536

7.3 Hitachi Construction Machinery contacts

Web site URL: hitachi-kenki.alertline.com

Email address: chl@hitachi-kenki.com



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Country	Telephone Number
Australia	1800 053 117
China	10 800 711 1189 (North) 10 800 110 1108 (South)
France	0800 91 8289
Germany	0800 225 5288
Japan	KKDI 00531 11 0218 Soft Bank 0066 33 830446 NNT 0034 800 600089
Malaysia	1800 81 6397
Singapore	800 110 1615
South Africa	0800 980 533
Thailand	001 800 11002 7562
United Kingdom	0808 234 0679
Other Countries	Country Code + 877 821 2943

8 Revision Summary

Revision Summary

Revision	Date Released	Clause/Section Revised and List of Changes	Revision By:	Approved By:
0	2-Jul-24	Original Release.	fsanders	crichards