Effective Altruism
Australia

WHISTLEBLOWER POLICY

PURPOSE

Effective Altruism Australia (EAA) is committed to the highest standards of ethical conduct, accountability and transparency. This policy supports that commitment by:

- Encouraging and enabling people to raise concerns about suspected misconduct or improper conduct within EAA without fear of reprisal
- Providing a safe and secure means for disclosing wrongdoing
- Supporting EAA's values, risk management and governance framework
- Meeting EAA's legal and regulatory obligations under the Corporations Act 2001 (Cth) and Taxation Administration Act 1953 (Cth)
- Ensuring disclosures are dealt with appropriately and on a timely basis

This policy outlines how EAA's eligible recipients will receive, investigate and respond to whistleblower reports in a fair and confidential manner, in accordance with Australian law and ASIC Regulatory Guide 270.

WHO THIS POLICY APPLIES TO

This policy applies to current and former:

- EAA directors and subcommittee members
- Employees (including permanent, part-time, fixed-term, temporary, casuals and secondees)
- Volunteers
- Contractors and consultants
- Suppliers of services or goods (whether paid or unpaid) and their employees
- Associates of EAA
- Relatives, dependents or spouses of any of the above

These individuals are eligible whistleblowers under the Corporations Act and are entitled to legal protections when they make a qualifying disclosure.

WHAT CAN BE REPORTED

Disclosable Matters

A disclosure qualifies for protection under this policy if you have reasonable grounds to suspect that the information concerns misconduct or an improper state of affairs in relation to EAA or its related entities.

You do not need to prove your allegations, but you should have some information or basis for your suspicion beyond mere speculation.

Examples of disclosable matters include:

- Dishonest, fraudulent or corrupt activity (including fraud or misappropriation of funds)
- Theft or misuse of EAA funds, property or resources
- Offering or accepting bribes or other corrupt practices

- Breach of legal or regulatory obligations, including:
    - Corporations Act requirements
    - Charities and not-for-profits legislation
    - Work health and safety laws
    - Environmental laws
    - Tax laws
- Financial irregularities or practices that may cause financial harm to EAA
- Unsafe work practices or serious risk to public safety or health
- Bullying, discrimination or harassment that breaches workplace laws or represents a systemic issue
- Conduct that may cause significant reputational harm to EAA
- Engaging in or threatening to engage in detrimental conduct against a person who has made or may make a disclosure
- Attempts to conceal any of the above

You can still qualify for protection even if your disclosure turns out to be incorrect, provided you had reasonable grounds to suspect wrongdoing when you made the disclosure.

Personal Work-Related Grievances

Disclosures that relate solely to personal work-related grievances generally do not qualify for protection under this policy. These are matters that:

- Relate to your current or former employment
- Have implications for you personally
- Do not have significant implications for EAA or relate to conduct covered above

Examples include:

- Interpersonal conflicts with another employee
- Decisions about your engagement, transfer, promotion, or terms and conditions
- Decisions to suspend, terminate or discipline you (where no breach of law is involved)

However, a personal work-related grievance may still qualify for protection if:

- It includes information about misconduct (a "mixed report")
- EAA has breached employment or other laws punishable by 12 months+ imprisonment
- You suffer or are threatened with detriment for making the disclosure
- You are seeking legal advice about the whistleblower protections

For personal work-related grievances please contact the CEO or Board Chair or seek independent legal advice about your rights under employment law.

False Reporting

While you are protected if your disclosure turns out to be incorrect, deliberately making a false report (one you know to be untrue) is a serious matter and may result in disciplinary action. However, EAA encourages you to speak up even if you don't have all the details. Having some information or reasonable suspicion is sufficient.

WHO CAN RECEIVE A DISCLOSURE

Internal Eligible Recipients

To qualify for protection under the Corporations Act, you should make your disclosure to one of the following eligible recipients within EAA:

- Chair of the EAA Board: michael.noetel@eaa.org.au
- Any EAA director or the CEO

External Recipients

You can also make a disclosure to external parties and qualify for protection:

Regulatory bodies:

- Australian Securities and Investments Commission (ASIC)
- Australian Charities and Not-for-profits Commission (ACNC)
- Australian Taxation Office (ATO) (for tax-related matters)
- Other Commonwealth bodies prescribed by regulation

Legal practitioners: You can disclose to a lawyer to obtain legal advice or legal representation about the whistleblower protections. This is protected even if the lawyer concludes your concern doesn't qualify as a disclosable matter.

Public Interest and Emergency Disclosures: In limited circumstances, you may make a disclosure to a journalist or parliamentarian. This is a complex area with strict requirements:

- **Public Interest Disclosure:** You must have first disclosed to ASIC, APRA or a prescribed body at least 90 days ago, have reasonable grounds to believe no action is being taken, believe further disclosure is in the public interest, and provide written notice of your intent to make a public interest disclosure to the original prescribed body. We recommend giving the original prescribed body at least 2 days notice.
- **Emergency Disclosure:** You must have first disclosed to ASIC, APRA or a prescribed body, have reasonable grounds to believe the information concerns substantial and imminent danger to health, safety or the environment, and provide written notice of your intent to make an emergency disclosure to the original prescribed body.

You should seek independent legal advice before making a public interest or emergency disclosure.

Before Making a Disclosure

If you would like more information before making a disclosure, you can contact the EAA Secretary and Chair confidentially (whistleblowing@eaa.org.au), or seek advice from an independent legal practitioner.

EAA encourages you to make disclosures internally in the first instance, as this allows us to identify and address wrongdoing early. However, you have the right to report directly to external regulators at any time.

HOW TO MAKE A DISCLOSURE

Methods Available

You can make a disclosure:

- **In person:** By meeting with an eligible recipient
- **By email:** whistleblowing@eaa.org.au

Emails sent to this address are received by the Chair and Secretary of the Board, who are responsible for monitoring the inbox, acknowledging disclosures, and ensuring they are handled in accordance with this policy.

Emailing allows for anonymous and confidential reporting. Disclosures can be made outside business hours using email.

Information to Include

When making a disclosure, please include (where possible):

- The nature of your concern and why you believe it is a disclosable matter
- Relevant dates, locations, and people involved
- Any evidence or documentation that supports your disclosure
- Whether you wish to remain anonymous
- How you would like to be contacted (if you wish to be contacted)

Anonymous Disclosures

You can make a disclosure anonymously and still be protected under the Corporations Act. You can:

- Choose to remain anonymous when making the disclosure
- Remain anonymous during any investigation
- Remain anonymous after the investigation is complete
- Refuse to answer questions that might reveal your identity

To maintain anonymity while allowing two-way communication, you may:

- Use an anonymous email address
- Use an external hotline with an anonymous reference number
- Adopt a pseudonym
- Communicate through a legal representative

While we will make every effort to investigate anonymous disclosures, investigations may be limited if we cannot contact you for additional information.

LEGAL PROTECTIONS FOR WHISTLEBLOWERS

If you make a qualifying disclosure, you are protected by law in the following ways:

1. Identity Protection (Confidentiality)

It is illegal for anyone to disclose your identity or information likely to identify you without your consent, except in the following circumstances:

- Disclosure to ASIC, ACNC, APRA, Australian Federal Police, or ATO
- Disclosure to a legal practitioner for legal advice
- Disclosure to a person or body prescribed by regulation
- You have consented to the disclosure
- The information disclosed does not include your identity, EAA has taken reasonable steps to reduce identification risk, and disclosure is reasonably necessary for investigating the matter

Unauthorised disclosure of your identity is a criminal offence with significant penalties.

2. Protection from Detrimental Conduct

It is illegal for any person to:

- Cause you detriment because they believe you have made, may make, or could make a protected disclosure
- Threaten to cause you detriment (whether express, implied, conditional or unconditional)

Detrimental conduct includes:

- Dismissal, demotion, or disciplinary action
- Discrimination, harassment or intimidation
- Harm or injury (including psychological harm)
- Damage to property, reputation, business, financial position or career prospects
- Alteration of duties to your disadvantage

Actions that are NOT detrimental conduct:

- Administrative action that is reasonable to protect you from detriment (e.g., relocating you to prevent contact with alleged wrongdoers)
- Managing your performance in line with EAA's performance management framework (if unrelated to your disclosure)

3. Compensation and Remedies

If you suffer loss, damage or injury because of a disclosure, and EAA fails to take reasonable precautions to prevent detrimental conduct, you may seek compensation and other remedies through the courts. You should seek independent legal advice about this.

4. Protection from Liability

You are protected from:

- Civil liability (e.g., legal action for breach of contract or confidentiality)
- Criminal liability (e.g., prosecution for releasing information)
- Administrative liability (e.g., disciplinary action)

These protections do not grant immunity for any misconduct you may have engaged in that is revealed in your disclosure.

5. Protections Under Tax Law

If your disclosure relates to tax matters, similar protections apply under the *Taxation Administration Act 1953*. For more information, visit the ATO website or contact the ATO.

HOW EAA WILL PROTECT AND SUPPORT YOU

Protecting Your Identity

The eligible recipient will take all reasonable steps to protect your identity:

- Redacting personal information and references that could identify you
- Referring to you in gender-neutral terms
- Storing all disclosure information securely with restricted access
- Limiting knowledge of your identity to those directly involved in the investigation (with your consent)
- Ensuring communications are sent to secure channels only
- Reminding all investigation personnel about confidentiality obligations and criminal penalties

Where possible, we will contact you to identify information that could inadvertently reveal your identity.

Protecting You from Detriment

The eligible recipient, in consultation with the Board where appropriate, will:

1. Conduct a risk assessment as soon as possible after receiving your disclosure to identify:
    - Whether anyone may have a motive to cause you detriment
    - Who you fear might cause detriment
    - Existing workplace conflicts or problems
    - Whether threats have already been made
2. Implement risk controls which may include:
    - Relocating you or alleged wrongdoers
    - Allowing you to work from another location
    - Reassigning duties
    - Providing regular check-ins and support
    - Monitoring the workplace environment
    - Taking disciplinary action against anyone who engages in detrimental conduct
3. Monitor and reassess risks throughout and after the investigation

Reporting Detriment

If you believe you have suffered detriment as a result of making a disclosure, you should immediately report this to the EAA Secretary or Chair. This will be investigated as a separate matter. You may also:

- Lodge a complaint with ASIC, ACNC, or the ATO
- Seek independent legal advice about your remedies
- Apply to the courts for compensation

INVESTIGATION PROCESS

1. Acknowledgment and Assessment (within 10 working days)

Upon receiving a disclosure, the recipient will:

- Acknowledge receipt (unless the disclosure is anonymous with no contact details)
- Conduct a preliminary assessment to determine:
    - Whether the disclosure qualifies for protection
    - Whether a formal investigation is required
    - What immediate risk control measures are needed

2. Investigation

If an investigation is required, the eligible recipient, in consultation with the Board where appropriate, will:

- Appoint an independent and impartial investigator (internal or external)
- Ensure the investigator has appropriate skills and no conflicts of interest
- Conduct the investigation:
    - Promptly and confidentially
    - Based on principles of procedural fairness and natural justice
    - With appropriate documentation at each step

EAA aims to complete investigations within 60-90 days, although this may vary depending on complexity.

EAA cannot disclose information likely to identify you during the investigation without your consent, unless we have removed identifying information and disclosure is reasonably necessary for the investigation.

3. Keeping You Informed

If the eligible recipient can contact you, they will provide regular updates on:

- When the investigation has commenced
- Progress during the investigation
- When the investigation is finalised

Update frequency will depend on the nature of the disclosure.

4. Investigation Findings

Following the investigation, the eligible recipient will:

- Document findings and report to the Board or its delegate
- Take appropriate corrective or disciplinary action where wrongdoing is substantiated
- Inform you of the outcome (subject to confidentiality and privacy obligations)

There may be circumstances where EAA cannot provide full details of the outcome to you due to confidentiality or privacy obligations to others.

5. If You're Not Satisfied

If you are not satisfied that your disclosure was handled appropriately or in accordance with this policy, you may:

- Request a review by contacting the EAA Board Chair
- Lodge a complaint with ASIC, ACNC, or the ATO
- Seek independent legal advice

FAIR TREATMENT OF INDIVIDUALS MENTIONED IN DISCLOSURES

EAA is committed to ensuring fair treatment of employees and others who are mentioned in a disclosure, including those who are the subject of a disclosure. This includes:

- Handling all disclosures confidentially
- Conducting objective, fair and independent investigations
- Applying principles of natural justice and procedural fairness
- Advising individuals about allegations against them at an appropriate time (generally before making any adverse finding)
- Not making assumptions about guilt

EAA may not inform an individual about an investigation at an early stage if doing so could compromise the investigation (e.g., risk of evidence destruction) or if the matter needs to be referred to authorities.

EAA'S RESPONSIBILITIES

The Board

The EAA Board is responsible for:

- Ensuring effective systems for confidential reporting, investigation and documentation
- Protecting whistleblowers from retaliation or adverse consequences
- Monitoring compliance with this policy and relevant legislation
- Reviewing this policy at least every three years
- Addressing broader trends, themes and emerging risks identified through disclosures

The Secretary

The Secretary is responsible for:

- Maintaining a confidential Register of Whistleblower Disclosures, recording:
    - Nature of disclosures (without identifying details)
    - Status and outcomes of investigations
    - Actions taken
    - Timeframes
- Providing de-identified reports to the Board on disclosure trends and policy effectiveness

All Employees and Directors

All employees and directors must:

- Comply with this policy
- Maintain strict confidentiality regarding any disclosure they become aware of
- Not engage in or threaten detrimental conduct
- Report any suspected breaches of this policy

BREACHES OF THIS POLICY

Any breach of this policy will be treated seriously and may result in:

- Disciplinary action (up to and including termination of employment or engagement)
- Legal action
- Referral to law enforcement authorities

Breaches include:

- Unauthorised disclosure of a whistleblower's identity
- Engaging in or threatening detrimental conduct
- Deliberately making a false report
- Failing to maintain confidentiality
- Victimisation or retaliation

MAKING THE POLICY AVAILABLE

Internal Access

This policy is available to all EAA directors, employees, volunteers and contractors through:

- The EAA website
- Google Drive
- Employee induction materials
- Direct distribution to all Board and current team members

External Access

This policy is publicly available on the EAA website at https://effectivealtruism.org.au/policies to enable suppliers, contractors, former employees and other external parties to access it.

ADOPTION

The EAA Whistleblower Policy is to be maintained by the EAA Board, ensuring it is reviewed at least every 3 years.

The EAA Board approved and adopted the EAA Whistleblower Policy on 11 August 2026. Any subsequent revisions are to be recorded in the following table:

Revision Number	**Date Approved**
EAA Whistleblower Policy	11 August 2026
Revision 1	*Due by 11 August 2029*