Whistleblower Policy
Lindsay Australia Limited ACN 061 642 733

1. Introduction

1.1 General

As an ASX listed company, Lindsay Australia Limited, together with its controlled entities (the "Company"), is required to comply with Relevant Law including the Corporations Act 2001 (Cth), and the Listing Rules.

This document sets out the Company's Whistleblower policy and forms part of the Company's risk management framework. The Company's policy is strict, the Company will support legitimate disclosures made under this Policy in compliance with Relevant Law. The Company is committed to enhancing investor confidence and high standards of corporate governance.

1.2 Policy overview

(a) This document outlines the obligations of the Company, its personnel and other stakeholders in upholding and complying with this Policy, and encourages all to openly voice their concerns regarding any inappropriate conduct referred to in this Policy as "Reportable Conduct"; and

(b) To provide information and to facilitate recognition of the need and benefit of suitable, compliant arrangements for individuals to feel safe and supported when voicing any concerns and provide the mechanism to manage the process around the reporting of such concerns; and

(c) This Policy applies to Employees and Directors of the Company and others with a connection to the Company including contractors, consultants, suppliers, brokers, auditors or relatives or spouses of individuals within this list.

2. Definitions and interpretation

2.1 Definitions In this document:

Term	Definition
ASX	means ASX Limited ACN 008 624 691.
Board	means the board of Directors of the Company.
Chair	means the chair of the Board.
Company	means Lindsay Australia Limited ACN 061 642 733 and as the context requires, its controlled entities.
Discloser	means a person who discloses Reportable Conduct under this Policy who is or at any time has been: (a) an employee of the Company; (b) an officer of the Company; (c) an individual who supplies services or goods to the Company (whether paid or unpaid); (d) an employee of a person that supplies services or goods to the Company (whether paid or unpaid); (e) an individual who is an associate of the Company; (f) a relative of an individual referred to in any of paragraphs (a) to (e);

Term	Definition
	(g) a dependent of an individual referred to in any of paragraphs (a) to (e), or of such an individual's spouse; (h) an individual prescribed by the *Corporations Regulations 2001* (Cth) as an 'eligible whistleblower' in relation to the Company.
Employee	means any full-time, part-time or casual employee of the Company
Listing Rules	means the rules of the ASX
Policy	means the policy contained in this document or in any amending or replacement document.
Management Officer	means the person appointed by the Company to undertake the duties outlined in this Policy which may be a member of Senior Management, Corporate Services or third-party service providers.
Relevant Law	means any applicable law and includes the Corporations Act 2001 (Cth), specifically Part 9.4AAA ("*Protection for Whistleblowers*") and ASX Corporate Governance Principles and Recommendations, 4th Edition.
Secretary	means the appointed Company Secretary(s).
Senior Management	Means any person with a title that includes the words "General Manager", Chief Executive Officer, Chief Financial Officer, Head of Technology and Transformation, Chief Operating Officer, Executive Director, CEO, Head of Corporate Services, Head of Safety, Risk, Compliance, Company Secretary, or General Counsel.
Corporate Services	means the Corporate Services team within the Company's head office.

2.2 Interpretation

Concepts not defined in this document, but which have a meaning in Relevant Law, or the Listing Rules have that same meaning in this document.

3. Policy requirements

This Policy applies when a Discloser makes a disclosure of Reportable Conduct. 'Reportable Conduct' under this Policy means any conduct (actual or suspected) in relation to the Company that is:

- Dishonest, unfair or unethical;
- fraudulent;
- illegal, criminal activity or an offence against any law;
- in breach of internal policy or procedures (including the Code of Conduct);
- misconduct or an improper state of affairs in relation to the Company;

- involves bribery or corruption;
- may cause financial or non-financial loss or damage to reputation or detriment to the Company's interests including wasting Company resources;
- a danger, a threat to endanger, or represents a danger, to staff or the public or the financial system, this includes unsafe work practices, environmental damage, health risks; or
- an attempt to conceal or delay disclosure of any of the above conduct.

Reportable Conduct excludes individual working arrangements, personal work-related grievances or conflict that would typically be reported to, or managed by a line manager, supervisor or human resources (Corporate Services), and do not have any broader implications for the Company. The processes outlined in this Policy should not be used for an improper purpose such as the pursuit of personal grievances, if that is found to be the case relevant disciplinary action may result.

The Company expects that any disclosures made under this Policy will only be made on a reasonable basis that they are true and correct. If disclosures made under this Policy are found to be knowingly false or breach any other policy of the Company such as the Code of Conduct, relevant disciplinary action may result.

4. Process for Reporting

When making a disclosure of Reportable Conduct, a person (the Discloser) may do so in person, by letter, e-mail or telephone call or other appropriate method, and may do so anonymously.

4.1 Internal Reporting

Disclosures may be made internally direct to a member of Senior Management, or by submitting an email to: whistleblower@lindsayaustralia.com.au. Disclosures submitted via this email address will be received by the Lindsay Australia Limited Head of Corporate Services and the Company Secretary.

4.2 External Reporting

Reportable conduct can be disclosed via Stopline, a confidential independent provider of whistleblowing services. Disclosures can be made to Stopline as follows:

By Phone: 1300 30 45 50

By visiting the Stopline website and online reporting form at:

https://lindsayaustralia.stoplinereport.com/

By Mail: PO Box 403, Diamond Creek, VIC 3089, Australia

Stopline will review reports made to it and direct those that require further consideration or possible investigation to Company representatives within Senior Management.

If the Discloser wishes to remain anonymous, he or she may do so.

Whilst it is not strictly required, a Discloser is encouraged to identify themselves when making a disclosure, this will facilitate the Company's response to the disclosure. If the

Discloser does not share their identity, the Company will assess the disclosure in the same way as if the Discloser had revealed their identity.
However there may be circumstances where the Company is unable to conduct an investigation, or where the scope of an investigation may be limited, such as where the Company is unable to contact the Discloser due to a lack of contact information, or where the Company cannot protect the Discloser's likely identity. Without the Discloser's consent, the Company cannot disclose information contained in a disclosure as part of its investigation process, unless:

- the information does not include the Discloser's identity;
- the Company redacts or withholds information relating to the Discloser's identity or other information that is likely to lead to the identification of the Discloser; or
- it is reasonably necessary for investigating the issues raised in the disclosure.

4.3 Confidentiality

All information reported or disclosed under this Policy will be treated confidentially and sensitively.

The identity of any Discloser (or any information which would be likely to identify the Discloser) will only be shared if:

- The Discloser provides consent to share that information; or
- The Disclosure is allowed or required by Relevant Law (for example, disclosure of information to a lawyer to get legal advice relating to the law on whistleblowing) or if compelled by a regulator or police.

In addition, in the case of information likely to identify the Discloser, if it is reasonably necessary to share the information for the purposes of an investigation, all reasonable steps will be taken to reduce the risk that the disclosing person will be identifiable.

Further, the non-identifying content of a disclosure may need to be shared in order to report a matter of significance to the CEO, Board or Chair including a situation of imminent and serious threat.

5. Protection

Any Discloser who agrees to make their identity known will be allocated a Management Officer who will assist by:

- seeking to protect the Discloser from any Detrimental Conduct;
- assist the Discloser in maintaining the Discloser's wellbeing;
- maintain Discloser's confidentiality, where relevant, including as required by Relevant Law;
- review and consider any complaints of Detrimental Conduct or any concern that the disclosure has not been dealt with in accordance with this Policy; and
- escalate any matter to the CEO, Board or Chair.

5.1 Detrimental Conduct

The Company strictly prohibits any form of Detrimental Conduct against any Discloser under this Policy.

Detrimental Conduct includes any actual or threatened conduct that could, or does cause a detriment to the Discloser as a result of the Discloser making a disclosure of Reportable Conduct, Detrimental Conduct includes but is not limited to:

- termination of employment or other adverse treatment relating to career or profession;
- harassment, bullying or intimidation;
- personal or financial disadvantage;
- unlawful discrimination;
- harm or injury, loss including psychological harm;
- damage to reputation;
- any other conduct that could reasonably be considered retaliatory in nature; or
- incites another person to engage in Detrimental Conduct.

The Company will take all reasonable and lawful steps to protect Discloser from Detrimental Conduct and will take action such as disciplinary action it considers appropriate where such conduct is identified (including termination of employment), and a person may also be subject to penalties if found guilty of an offence under Relevant Law.

The Company also strictly prohibits all forms of Detrimental Conduct against any persons whatsoever who are involved in an investigation of a disclosure of Reportable Conduct.

Relevant Law may also provide additional protection for certain disclosures by people who make them in accordance with the provisions of that legislation. These protections are designed to encourage people to disclose unlawful, improper or unethical behaviour to relevant parties including regulators.

5.2 Escalations – Management Officer

The Discloser should immediately inform the Management Officer if Discloser is concerned that:

- Discloser may be, is being, or has been subjected to Detrimental Conduct; or
- the disclosure has not been dealt with in accordance with this Policy.

The Management Officer will consider the concerns the Discloser has raised and, may take such action as considered appropriate including escalation to Senior Management. Although, the Management Officer may not be able to take action if the Discloser is anonymous. If the Discloser is concerned about the actions of the Management Officer, the Discloser may report the concern to a member of Senior Management.

5.3 Escalations – Senior Management

A Discloser may escalate a concern directly to a Senior Manager if the Discloser considers that:

- the Management Officer has not adequately actioned the issue or complaint regarding Detrimental Conduct; or
- this Policy has not been followed by the Company.

A Discloser may request that the Management Officer escalate the Discloser's concerns to the CEO, Board or Chair if the Discloser is not satisfied with the:

- the outcome of any investigation; or

- a decision not to conduct an investigation regarding the Reportable Conduct.

If a Discloser wishes to make such a request, the Discloser may provide the Management Officer with a written submission to be sent to the CEO, Board or Chair setting out the concern. When considering the request, there is no requirement on the CEO, Board, Chair or Company to reopen or reinvestigate the matter.

5.4 Support

If a Discloser is a current or former Employee (or an immediate family member thereof), those persons may access the Company's confidential counselling service. Current and former Employees may also request additional support from the Management Officer if required.

The Company will endeavour to support a Discloser, but it will not be able to provide the same practical support to non-Employees that it provides to current Employees. Therefore, the processes in this Policy will be adapted and applied to the extent reasonably possible. Options for support for Employees may also include leave, relocation to alternate business area or secondment subject to applicable circumstances.

The Company will at all times be able to raise and address with any Discloser's who are Employees matters that arise in the ordinary course of employment or contractual relationship (for example, any separate performance or misconduct concerns).
The Company may, at its discretion waive or grant a Discloser immunity from internal disciplinary proceedings relating to matters that are discovered or determined as a result of the disclosure, and or offer a suitable reward for the disclosure.

6. Investigation

The Company or third party service provider will carry out a preliminary review of all disclosures and if necessary, escalate the issue for further review by relevant Senior Manager(s). A decision will be made as to whether the allegations raised will be formally investigated.

Not all disclosures will necessarily lead to a formal investigation by the Company, such as circumstances where the matter or issue is already known to the Company, however all disclosures will be assessed, and a decision made as to whether they should be formally investigated.
The Company's response to a disclosure will vary depending on the circumstances and detail of information provided.

Where identification/contact information is provided the Management Officer, the Management Officer will advise the Discloser of the decision taken as to whether there will be a formal investigation in relation to the disclosure.

If the disclosure is to be investigated the Company will initiate the investigation. Any investigation will be conducted internally or through engagement by the Company of third party service providers, the Management Officer will not conduct the investigation.

6.1 Process

Investigations will follow a fair process, be conducted in as timely a manner as the circumstances allow and be independent of the person(s) about whom any disclosure has been made. Investigations may include conducting interviews, taking statements and the review of any relevant materials or evidence.

The Management Officer will, as appropriate, provide the Discloser with feedback on the progress and expected timeframes of the investigation.

Provided there are no restrictions or other reasonable basis for doing so, persons against whom a disclosure of Reportable Conduct has been made will be informed of the disclosure and will have an opportunity to fully respond.

6.2 Findings

The investigation may conclude with a report from the investigator. The report will include findings on the disclosure and a summary of the evidence on which the findings are based.

To the extent permitted under Relevant Law, the Management Officer may inform the Discloser and/or a person against whom a disclosure has been made of the findings, subject always to relevant privacy considerations. Any report will remain the property of the Company and will not be shared with the Discloser or any person against whom the disclosure has been made.

Subject to the nature of the findings of any investigation the CEO, Board and or Chair may consider any form of disciplinary action and or if possible, putting in place appropriate procedures, checks and balances to ensure that the matter does not occur again.

7. Regulators

Nothing in this Policy prevents or limits a Discloser from disclosing Reportable Conduct to a regulator under Relevant Law.

8. Application

Any breach of this Policy may be regarded as misconduct which may lead to disciplinary action such as termination of employment or other sanctions that apply under Relevant Law.

This Policy will be reviewed routinely as required to ensure its effectiveness, but not less than every three years or as required by any change of Relevant Law.

This Policy is accessible internally to employees through the Intranet and is also publicly available on the Lindsay Australia Limited website:
https://www.lindsayaustralia.com.au/company/corporate-governance/