Hungry Jack's Whistleblower Policy

Background

Whistleblowing is about people taking steps to right perceived Wrongdoings. Unchallenged, such Wrongdoing can reduce profitability, tarnish Hungry Jack's reputation, demoralise employees, and result in substantial fines or costly lawsuits.

Hungry Jack's Code of Conduct and our policies generally have been developed to ensure high standards of conduct and ethical behaviour in all our business activities.

We have developed this policy to ensure that employees and others (the "discloser") can report when they reasonably believe someone has engaged in Wrongdoing (see paragraph below "What is a Wrongdoing") and Hungry Jack's is committed to supporting and protecting whistleblowers about

actual or suspected contravention of our ethical and legal standards without fear of reprisal, threats or victimisation by doing so

Purpose: Why was this Policy Created?

This policy was created to:

- encourage employees' other relevant parties to internally report or externally report (if internal reporting has been unsuccessful), an issue if they reasonably believe someone has engaged in Wrongdoing;
- outline how Hungry Jack's will deal with all reported Wrongdoing;
- assist in ensuring that reporting of Wrongdoing is identified and dealt with appropriately; and,
- meet the legislative requirements to protect whistleblowers under the Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 (Cth) amendments to the Corporations Act 2001 (Cth), Taxation Administration Act 1953 (Cth) ('the Whistleblowers Act') and Modern Slavery Act 2018 (Cth).

Scope: Who does the Policy Apply to?

- This policy applies to both current and former employees, officers (e.g. Directors), associates (e.g. a partner in the business such as franchisees), including suppliers, distributors, consultants, volunteers, interns and in some instances a spouse, child and dependant of such persons, of Hungry Jack's. This policy supersedes the Hungry Jack's Whistleblower Protection Policy May 2021.

How is a Whistleblower Protected?

Any protected disclosure made under this policy is confidential and may be made anonymously by the person making the report if they wish to protect their identity. The only exception to this is if a disclosure is required by law (for example, in a police investigation).

Therefore, unless consent is provided, the identity of an individual or individuals participating in the process will not be included in any personnel file or performance review. The report and the investigation in relation to the matters raised in the disclosure will not be provided to anyone except those persons actively involved in the investigation.

It is a criminal offence to victimise a whistleblower because of a protected disclosure and if a whistleblower suffers damage/detriment because of such victimisation, the whistleblower can claim compensation for that damage from the offender through the court system.

How to make a Protected Disclosure?

Five criteria apply about how you can make a disclosure:

1. You must be a current and/or former director, officer (e.g. Director), associate (e.g. partner in the business), employee, supplier, distributor, and in some instances your spouse, child and dependent can make a disclosure.
2. You must make the disclosure to an officer (e.g. Director) or senior manager of Hungry Jack's, Hungry Jack's auditors or another person or organisation as authorised by the Hungry Jack's. This may include the individual's managers or supervisors, but only if the discloser is comfortable to do so.
3. The disclosure can remain anonymous, except as may be required by law, but the person can consent to provide their details.
4. You must have reasonable grounds to suspect that the information you are disclosing concerns a Wrongdoing (see paragraph below "What is a Wrongdoing you may report?").
5. A disclosure excludes personal work-related grievances e.g. interpersonal conflict, termination of employment or disciplinary matters, etc. (see below paragraph "Important Exclusions")

What is a wrongdoing you may report?

A Wrongdoing may include:

- Any breach of Hungry Jack's policies (including the Code of Conduct);
- Corrupt behaviour, including soliciting, accepting or offering a bribe;
- Dishonest, unethical or fraudulent activity;
- Improper behaviour relating to accounting, accounting controls or audit matters;
- Theft or fraud relating to Hungry Jack's assets, including intellectual property, or use of such property other than for the benefit of the Hungry Jack's;
- Breach of financial services laws;1

- Serious breach of other Commonwealth or State laws 2
  - Including but not limited to: CCA, ACL, Corporations Act, WHS, Food Safety
- Significant mismanagement or waste of funds or resources;
- Abuse of authority related to the workplace;
- Serious harm to public health, safety or environment or the health and safety of any Hungry Jack's employee or contractor; or
- Action taken against, or harm suffered by, someone as a result of making a report under this policy.

Important Exclusions

This policy does not apply, nor provide whistleblower protection, if the matter raised by the discloser is a personal work-related grievance about a personal situation, matters generally dealt with under Hungry Jack's Workplace Grievance policy. This policy primarily concerned with persons raising concerns about Wrongdoings relating to Hungry Jack's itself.

1 These laws are listed in section 1317AA(5)(c) Whistleblowers Act and include breaches of the Corporations Act 2001, ASIC Act, Banking Act 1959 and Superannuation Industry (Supervision Act) 1993.
2 Any Commonwealth offence punishable by 12 months or more jail per Section 1317AA(5)(d) of the Whistleblowers Act.

Examples of grievances that may be personal work-related grievances and therefore are not protected, are as follows:

(a) an interpersonal conflict between the employee and another employee;
(b) a decision relating to the engagement, transfer or promotion of the employee;
(c) a decision relating to the terms and conditions of engagement of the employee;
(d) a decision to suspend or terminate the engagement of the employee, or otherwise to discipline the employee.

Grievances that are not protected under this policy may also be raised through the Hungry Jack's Employee Helpline on 1300 45 47 35. The Hungry Jack's Employee Helpline service is a third-party service available to employees to escalate personal queries relating to their employment. Employees should seek to resolve issues in line with the Hungry Jack's Workplace Grievance Policy & Resolution Procedure prior to contacting the Employee Helpline.

If you are not sure about whether a particular concern should be raised under this whistleblower policy or under the Grievances policy or both policies, we encourage you to raise your concerns under this policy by calling the Hungry Jack's Whistleblower Service on 1300 241 659 (as below paragraph). The nominated representative will assist you to decide how the concern should be dealt with.

Who should I talk to?

If you become aware of any matter or behaviour you think contravenes our Code of Conduct, policies or the law, then you can report:

- to our independent third party provider "Hungry Jacks Whistle-Blowers Help Line" by calling the phone number 1300 241 659

or;

- in writing, by emailing to our independent third party provider with all relevant details of your disclosure – whistleblowerhelpline@hungryjacks.com.au

Our independent third-party provider will manage the reporting of disclosures via both the phone number and email listed above. The nominated third-party provider is 3ER Pty Ltd. All correspondence via these services will be handled by a senior consultant in line with the requirements of this policy. The telephone service is available Monday - Friday, 8:30am until 5:30pm AEST. Outside of these hours, an answering service is available, and your call will be returned on the next available business day. All enquiries received via email will be actioned the following business day.

Alternatively, you can report directly to Hungry Jack's Chief People Officer via post:

- by post to Level 6, 100 William Street, Woolloomooloo NSW 2011, addressed to the 'Chief People Officer'

What happens after I make a protected disclosure?

Any complaint made under this policy is confidential and may be made anonymously. Unless consent is provided no details of your participation in this process will be included in your personnel file or performance review. The report will not be disclosed to anyone except those that are actively involved in investigating the matters raised in the report.

When you make a complaint, the Chief People Officer or nominated representative will advise how the investigation will proceed including possible timeframes and when a possible outcome will be made. The Chief People Officer or a nominated representative will assess the concern(s) and propose a course of action and will investigate it appropriately and, where applicable based on the nature of the disclosure, will provide the discloser feedback regarding the investigation's outcome. Hungry Jack's will take any required action in response to a report resulting from the investigation and document an explanation supporting what action will be taken, or that no action will be taken, and why for use internally. The method for documenting and reporting the findings will depend on the nature of the disclosure. Depending on the nature of the disclosure, there may be circumstances where it may not be appropriate to provide details of the outcome of the investigation to the discloser. This will be determined by the Chief People Officer and/or the investigating party and advised to the discloser as appropriate. Where possible, Hungry Jack's will aim to provide a brief response to all disclosers at the conclusion of the investigation.

All matters raised will be treated in a secure and sensitive way with appropriate confidentiality, but not all disclosures will proceed to investigation.

Investigation processes will be tailored depending on the nature of the matter and the Chief People Officer will determine the best individual or individuals to conduct an investigation into the matter(s) raised. Hungry Jack's objective is to commence the investigation as soon as possible but within two weeks of disclosure.

All investigations will be conducted in a manner that is objective and affords procedural fairness. A matter will be investigated by an independent person to avoid any conflict of interest.

Depending on the matters being investigated, a relevant report may be required to authorities.

What are the Public Interest and Emergency Disclosures and your rights?

Hungry Jack's will investigate the disclosure as soon as practicable and take measures it considers necessary to address the matters you have raised. Hungry Jack's will ensure you are informed of the outcome of its investigation.

If you have reason to believe that Hungry Jack's has not responded appropriately to the disclosure within 90 days, you have a right to make a 'public interest disclosure' where you believe it is in the public interest to do so or that there is substantial and imminent danger to a person's health or safety.

In this case, you are first obliged to advise Hungry Jack's that you intend to make such a public interest disclosure.

The further disclosure must be made to a member of parliament or to a journalist and must be no greater than is necessary to inform them of the:

- Wrongdoing; or
- Substantial or imminent danger to a person

What happens if I am mistaken?

If you raise a genuine concern under this policy, you will not be at risk of losing your job, nor will you suffer any form of detrimental action as a result. As long as you are acting in good faith and in accordance with this policy, it does not matter if you are mistaken. The Corporations Act provides protections against civil, criminal, and administrative liability for whistleblowers, as outlined in s.1317AI(5)(a) of the Act.

If you believe that you are being subject to a detriment within the workplace as a result of raising concerns under this policy, you should inform one of the whistleblower contacts under the paragraph "Who should I talk to?" immediately.

However, if you make a report that is misleading, it may damage the career prospects and reputation of anyone who is the subject of your allegations. In this case, you may face disciplinary action under the Managing Employee Performance and Behaviour policy.

Need more Information?

Please contact the People & Culture Department if you have any queries or concerns about this policy.

Related Policies

- Hungry Jack's Code of Conduct
- Hungry Jack's Workplace Grievance Policy & Resolution Procedure

Availability of this Policy

This policy is available to all employees, officers and associates engaged with Hungry Jack's and can be found on Hungry Jack's Intranet (Whoppernet), Policies and Procedures Folder and on JEDI Employee Online Learning System, in Manuals and Files.
This policy is also available to external parties via Hungry Jack's Website – Contact us

Policy Updates

Update	Details	Effective Date
Consultant Change	Consultants changed to 3ER	1st August 2026
Formatting Changes	As per current formatting template	1st August 2026