



# Whistleblower Procedure

## Brief description

Gladstone Ports Corporation (GPC) is committed to creating and maintaining the highest standards of conduct and ethical behaviours in all our activities. As part of this commitment, this Whistleblower Protection Procedure provides a process to encourage the disclosure of information about Wrongdoing which includes misconduct or an improper state of affairs, whilst protecting persons who report this conduct and make disclosures under this Procedure. This is GPC's procedure on whistleblowing pursuant to section 1317AI of the Corporations Act 2001 (Cth).

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### Document accountability

Role	Position
Owner	Board
Custodian	Whistleblower Coordinator

Approved by Board on 19/07/2024

If you require any further information, please contact the Custodian.

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The current version of this Procedure is available on GPC's Intranet.

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# 1 Terms and definitions

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In this Procedure:

**"Associate"** has the meaning given to it by sections 10 – 17 of the Corporations Act.

**"Consultant"** means Core Integrity or any other third party engaged by GPC to assist in relation to the management of Protected Disclosures from time to time.

**"Corporations Act"** means the *Corporations Act 2001* (Cth).

**"Whistleblower Coordinator"** is currently the Company Secretary. In the event that:

- a) the individual acting as the Whistleblower Coordinator is conflicted, the Whistleblower Coordinator for that disclosure will be the Chief Executive Officer ("**CEO**"); or
- b) both the CEO and the Whistleblower Coordinator are conflicted, the role of Whistleblower Coordinator in relation to that disclosure is the Chair of the Board, or another appropriately qualified senior employee as nominated by the Chair.

Terms that are capitalised and not otherwise defined in this Procedure are defined in the GPC Corporate Glossary Instruction (as listed in Appendix 1 – Related documents).

## 2 Introduction

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### 2.1 Purpose

GPC, its subsidiaries and related entities are committed to creating and maintaining a workplace where strong ethical standards are upheld and displayed through Employee behaviour. This includes the reporting and disclosure of information about Wrongdoing which involves suspected misconduct or an improper state of affairs or circumstances relating to GPC.

### 2.2 Scope

This Procedure applies to current and former (and the spouse, dependents and other relatives of):

- (a) Officers of GPC, including every member of the Board;
- (b) Chief Executive Officer;
- (c) Members of the Executive Leadership Team;
- (d) Employees;
- (e) Consultants;
- (f) Associates of GPC; and
- (g) Contractors and suppliers of GPC (and employees of suppliers).

### 2.3 Objectives

GPC encourages the reporting of any instances of suspected Wrongdoing, and providing support and protections to Eligible Whistleblowers through the Protected Disclosure process so that reports can be made safely and securely. Reporting of Wrongdoing helps GPC to identify issues that may not otherwise be uncovered.

This Procedure sets out the process for making Protected Disclosures including who Protected Disclosure can be made to; what Protected Disclosures need to be about; and the protections available to those who make Protected Disclosures.

## 3 Making a Protected Disclosure

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### 3.1 Who can make a Protected Disclosure

A person (“**Eligible Whistleblower**”) who currently is, or who has previously been, one of the following can make a Protected Disclosure under this Procedure:

- a) an Officer or Employee of GPC;
- b) an individual who supplies goods or services to GPC, or an employee of a person who supplies goods or services to GPC;
- c) an individual who is an Associate of GPC; or
- d) a relative, dependent or spouse of any individual referred to at 1 to 3 above.

**Note:** in making a Protected Disclosure, an Eligible Whistleblower can decide to remain anonymous.

### 3.2 What types of Wrongdoing can be the subject of a Protected Disclosure

A Protected Disclosure is about wrongdoing involving any past or present misconduct; or improper state of affairs; or circumstances that is related to GPC; including conduct of GPC Officers and Employees (“**Wrongdoing**”).

#### (a) Examples of wrongdoing

Wrongdoing does not need to be something illegal. Examples of Wrongdoing could include the following conduct:

- i. conduct which is dishonest, fraudulent or corrupt, including bribery;
- ii. conduct which is illegal<sup>1</sup>;
- iii. improper affairs relating to accounting, tax, actuarial, audit, internal controls or compliance;
- iv. unethical conduct in relation to the performance of official functions and duties;
- v. abuse or serious mismanagement of GPC's property or resources;
- vi. conduct which is seriously detrimental to GPC's financial position;
- vii. conduct which may cause financial loss to GPC or damage its reputation or be otherwise detrimental to GPC's interests;
- viii. conduct endangering the public, health and safety or damaging the environment;
- ix. a breach of a protection described in this Procedure; or
- x. the concealment of any such conduct as detailed above.

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<sup>1</sup> For example, a breach of laws or regulations including an offence against, or a contravention of any provision of the Acts listed in s 1317AA of the Corporations Act, or instruments made under those Acts, tax laws, or an offence against any Commonwealth law punishable by imprisonment for 12 months or more.

Note: certain types of reports about Wrongdoing (e.g. reports of reprisals, or reports by employees about suspected corrupt conduct) may also be subject to and may be handled by GPC in accordance with GPC's Public Interest Disclosure Procedure.

### **(b) Exceptions**

Wrongdoing does not include, and this Procedure does not cover, personal work-related grievances. These are grievances that relate solely to an Employee's current or former employment with implications for them personally, such as interpersonal conflicts, decisions relating to their engagement, transfer or promotion, decisions relating to the terms and conditions of their engagement, or a decision relating to their suspension, termination or discipline.

**Note:** Employees should raise these types of grievances as set out in the Grievance Resolution Management Specification.

Questions about whether a concern relates to Wrongdoing or is a grievance should be directed to the Consultant (see their contact details in Section 3.3 below) or the Whistleblower Coordinator. Remember, a report will be dealt with and protected under this Procedure if it:

- a) is a mixed report that includes information about Wrongdoing;
- b) relates to any detriment or threat because of a previous report of Wrongdoing;
- c) relates to particular offences or breach of laws, or has significant implications for GPC;  
or
- d) is made to an Australian-qualified lawyer to seek advice about whistleblower protections.

## **3.3 Who can a Protected Disclosure be made to**

A Protected Disclosure may be made to any of the following persons ("**Eligible Recipients**")<sup>2</sup>:

- a) an Officer or senior manager of GPC;
- b) the Whistleblower Coordinator or Consultant by:
  - i. calling GPC's confidential reporting hotline on 1800 693 362 between 8.30am to 5pm, Monday to Friday;
  - ii. filling out an online reporting form available at <https://speakup.coreintegrity.com.au/gpc>;
  - iii. emailing a report to [gpcspeakup@coreintegrity.com.au](mailto:gpcspeakup@coreintegrity.com.au); or
  - iv. sending a letter:

Marked "CONFIDENTIAL"  
Attention: Whistleblower Coordinator  
PO Box 259  
Gladstone Q 4680

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<sup>2</sup> In limited circumstances, certain 'public interest' or 'emergency' reports can be made a member of Parliament or a Legislative body or a journalist and are also protected by law. If an Eligible Whistleblower is seeking to make such a report, it is important to understand the criteria that must be met, which include:

- that a report to ASIC or APRA has already been made;
- (in the case of a 'public interest' report) at least 90 days have passed, and they have reasonable grounds to believe that no action is being taken, or (in the case of an 'emergency' report) they have reasonable grounds to believe the report concerns a substantial and imminent danger to health, safety or the environment; and
- they give the body to whom the report was made to written notice they intend to make a 'public interest' or 'emergency' report. Persons may wish to contact a lawyer about whether the criteria have been met prior to making such a report.

- c) an internal or external auditor or member of an audit team conducting an audit, an actuary, or member of the finance team with tax responsibilities of GPC, or a related body corporate;
- d) the Australian Securities and Investment Commission, the Australian Prudential Regulation Authority, the Australian Taxation Office (for a tax related matter), or other prescribed Commonwealth Authority; or
- e) an Australian-qualified lawyer to seek advice about whistleblower protections (in which case a report will be protected even if the matter turns out not to be Wrongdoing).

**Note:** GPC encourages reports to be made to its Consultant, as they are best placed to deal with disclosures expeditiously.

### 3.4 Making a Protected Disclosure

Eligible Whistleblowers should provide as much information as possible, including:

- a) details of the Wrongdoing;
- b) people involved;
- c) dates and locations;
- d) context surrounding the Wrongdoing, the Eligible Whistleblower's actions (if any); and
- e) if any more evidence or witnesses may exist.

**Note:** to make a Protected Disclosure about Wrongdoing, an Eligible Whistleblower must have reasonable grounds to suspect that the information they have concerns these matters. Eligible Whistleblowers will still be protected even if it turns out the report is incorrect. However, knowingly making a false report may result in disciplinary action and may also be an offence under the Corporations Act.

#### (a) Anonymous disclosures

Eligible Whistleblowers can choose to remain anonymous, including during any investigation or after any investigation is finalised.

Eligible Whistleblowers may also refuse to answer any questions they feel could reveal their identity. If an Eligible Whistleblower chooses to remain anonymous, their disclosure can still amount to a Protected Disclosure, and they are still entitled to the protections under this Procedure and the Corporations Act.

However, responding to a disclosure (including, if the disclosure is assessed as a Protected Disclosure, investigating the Protected Disclosure) may be difficult unless sufficient information is provided, and GPC will not be able to provide the same level of practical support or protection if GPC does not know who has made the report.

GPC requests that Eligible Whistleblowers, if choosing to remain anonymous at least provide a way to maintain contact (e.g. through an anonymised email address) so that GPC can ask follow up questions or provide feedback in relation to the disclosure.

Eligible Whistleblowers should contact the Consultant or the Whistleblower Coordinator to discuss how GPC can protect their identity if they have concerns about disclosing their name.

**Note:** protecting anonymity may include adopting a pseudonym for the purposes of their Disclosure, or communication through anonymous telephone hotlines or anonymised email addresses.

## 4 Handling Protected Disclosures

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### 4.1 Receiving and assessing Protected Disclosures

All disclosures are received and treated sensitively and seriously, and will be dealt with promptly, fairly and objectively.

Those disclosures made to the Consultant will be initially assessed by the Consultant and reviewed by the Whistleblower Coordinator, and all other disclosures will be reviewed by the Whistleblower Coordinator, to determine whether:

- a) it is a matter about which a Protected Disclosure can be made in accordance with this Procedure;
- b) the disclosure has been made to an Eligible Recipient in accordance with this Procedure; and
- c) the Eligible Whistleblower is able to receive the protections under this Procedure and the Corporations Act; and/or
- d) it is a public interest disclosure (**PID**) (for the purposes of the *Public Interest Disclosure Act 2010* (Qld)) and / or if there are reasonable grounds to suspect it involves, or may involve, corrupt conduct (for the purposes of the *Crime and Corruption Act 2001* (Qld)).

Where a report is a PID, or there are reasonable grounds to suspect it involves or may involve corrupt conduct, the steps to be taken, as set out in GPC's Public Interest Disclosure Procedure, will apply.

**Note:** if there is doubt about whether a disclosure is a Protected Disclosure, further information may be obtained to inform the assessment. If doubt still remains, the Consultant and/or the Whistleblower Coordinator will assume the disclosure is protected and manage it as if it is a Protected Disclosure.

**Additional notes:** The following matters are not relevant to the assessment of whether an Eligible Whistleblower's disclosure is a Protected Disclosure, and should not be given consideration:

- a) how the disclosure is received (e.g. orally or in writing);
- b) if the disclosure is made anonymously;
- c) whether the Eligible Whistleblower specifically identifies a person who may have been involved in the conduct, the subject of the disclosure;
- d) whether the Eligible Whistleblower identifies the information as "Wrongdoing" or refers to the whistleblower protections under the Corporations Act.

### 4.2 Investigation and management of Protected Disclosures

The Whistleblower Coordinator (who may seek advice from the Consultant) will assess and determine what steps may be required to respond to the Protected Disclosure, which may include:

- i. There may be insufficient information in the Protected Disclosure to determine next steps. To the extent possible, the Consultant or the Whistleblower Coordinator will initiate a discussion with the Eligible Whistleblower about obtaining further information. If there is insufficient information to warrant further investigation or action, the Whistleblower Coordinator will notify the Eligible Whistleblower;

- ii. To the extent permitted by law, providing information to the Eligible Whistleblower regarding the surrounding circumstances which explain the person's conduct. This may be relevant if the Eligible Whistleblower did not have access to all of the relevant information which would inform the assessment of whether the conduct amounts to Wrongdoing;
- iii. Reviewing the operations of a particular team within GPC;
- iv. Mediating disputes between relevant personnel;
- v. Conducting an internal audit;
- vi. Changing internal policies, procedures or practices;
- vii. Increased supervision or performance management strategies, counselling or training; and/or
- viii. initiate an investigation of the Protected Disclosure.

**(a) Investigating the Protected Disclosure**

In most cases, the Whistleblower Coordinator may decide it is appropriate to investigate the matter and to appoint an external investigator. It remains the role of the Whistleblower Coordinator to be satisfied that the investigator has appropriate knowledge of, and the protections provided under, the Corporations Act and GPC's Whistleblower Procedure. The investigation must be conducted in accordance with the principles of natural justice, and the protections outlined in this Procedure and the Corporations Act.

While the scope and timeframe for any investigation differs depending on the Protected Disclosure being examined, any investigations commenced will be conducted in a timely manner and will be fair and independent from persons involved in the Wrongdoing, the Eligible Whistleblower or the department involved. All GPC employees must cooperate fully with any investigations.

Where appropriate, the Whistleblower Coordinator will provide updates on the process to the Eligible Whistleblower. However, the timing of updates and level of detail GPC can provide will depend on the nature of the Protected Disclosure and subject to privacy and confidentiality restrictions and legal obligations. To avoid jeopardising the investigation, an Eligible Whistleblower is required to keep that fact that they have made a Protected Disclosure and the information in the disclosure strictly confidential (subject to any legal requirement).

Following an investigation, the Whistleblower Coordinator must refer the investigation report to the appropriate decision-maker to consider what action will be taken in relation to any substantiated allegations and the appropriate action to be taken.

The decision-maker will be:

- a) the Chief Executive Officer; or
- b) if the CEO is the Whistleblower Coordinator or is otherwise conflicted, the Chair of the Board, or another appropriately qualified senior employee as nominated by the Chair.

Note: the Whistleblower Coordinator may seek advice from the Consultant as to the appropriate decision-maker.

To the extent determined by GPC to be appropriate and subject to privacy and confidentiality restrictions and legal obligations, the Whistleblower Coordinator will advise the Eligible Whistleblower the outcome of the investigation in the manner considered appropriate in the circumstances.



Where an investigation identifies a breach of GPC's Code of Conduct or internal policies, standards and procedures, the matter will be dealt with in accordance with GPC's relevant policies, standards and procedures.

## **(b) Persons named in a Protected Disclosure**

GPC is committed to ensuring the fair treatment of any person who is mentioned in a Protected Disclosure, by maintaining confidentiality of information contained in Protected Disclosures in accordance with the requirements of this Procedure. In particular, persons named in a Protected Disclosure will:

- i. be provided procedural fairness;
- ii. be informed of the substance of the allegations if a decision is going to be made about their conduct (to the extent permitted by law);
- iii. have a reasonable opportunity to put their case forward (whether in writing, at a hearing or otherwise); and
- iv. have a decision maker act fairly and without bias.

Providing procedural fairness does not mean that GPC must advise persons named in a Protected Disclosure of the allegations(s) against them as soon as it is received. Persons named in the Protected Disclosure do not need to be told about an allegation against them if it is misleading or found to be of no substance, and GPC does not intend to act on the allegation. GPC will only provide the name of the Eligible Whistleblower in accordance with the Corporations Act and this Procedure.

Where and when it is appropriate to advise persons named in a Protected Disclosure, GPC will reassure them that the Protected Disclosure will be investigated and assessed impartially, objectively and reasonably. Persons named in a Protected Disclosure will be reassured that a Protected Disclosure is only an allegation until evidence collected shows otherwise. GPC will provide the persons named with information about their rights and the progress and outcomes of any investigations to the extent permitted by the Corporations Act. GPC will also refer the person(s) to the GPC Employee Assistance Program and/or Human Resources Support to ensure they receive appropriate support.

## **5 Protection and support**

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GPC is committed to ensuring confidentiality in respect of all matters raised under this Procedure, and that Eligible Whistleblowers do not suffer detriment, because they make or plan to make a Protected Disclosure ("**Detrimental Action**"). It is illegal to cause or threaten Detrimental Action.

### **5.1 Protection against Detrimental Action**

Detrimental Action includes, but is not limited to, any of the following, including threats of the following:

- a) dismissal, or changes in work conditions or position or duties;
- b) discrimination;
- c) injury or harm to a person or their property;
- d) harassment, intimidation or psychological harm; and
- e) damage to property, reputation, business or financial position.

Examples of steps GPC may take to protect Eligible Whistleblowers from detriment include:

- i. offering to allow the discloser to perform their duties from another location; or
- ii. reassigning or relocating staff involved in the disclosable matter.

Note: Detrimental Action does not include administrative action that is reasonable for the purposes of protecting an Eligible Whistleblower from Detrimental Action (for example, relocation to a different work area) or managing an Eligible Whistleblower's unsatisfactory work performance for reasons other than the Protected Disclosure, in line with GPC's policies and procedures.

GPC will look for ways to support and protect Eligible Whistleblowers who are not its employees but, practically, is more limited in the support that can be provided.

An Employee found to have subjected an Eligible Whistleblower to Detrimental Action may be subject to disciplinary action, including termination of employment.

Persons, including Employees and Board Members, identified in a Protected Disclosure in any manner, including as a witness or person subject to allegations, will be treated fairly by GPC and in accordance with applicable legal requirements and obligations as well as GPC policy and procedures.

## **5.2 Confidentiality and anonymity**

All information received as part of a Protected Disclosure, as well as the fact that a person has made a Protected Disclosure, is held securely and remains strictly confidential in accordance with the Corporations Act and this Procedure.

An Eligible Whistleblower's identity will be kept confidential to the fullest extent possible, and it is illegal to share the identity of, or information that is likely to identify an Eligible Whistleblower, unless the disclosure of the identity of the Eligible Whistleblower:

- a) is to ASIC, APRA or the Australian Federal Police;
- b) to a legal practitioner for the purposes of obtaining legal advice or legal representation about the whistleblower provisions in the Corporations Act;
- c) as prescribed by regulations and/or required or allowed by law; or
- d) with the consent of the Eligible Whistleblower.

In some circumstances, a decision to remain anonymous may impact on the nature of any investigation. GPC may be unable to investigate a Protected Disclosure (or practically limited in what can be done), if GPC cannot contact an Eligible Whistleblower or, an Eligible Whistleblower does not agree to allowing an investigator to make contact.

GPC can share information contained within a Protected Disclosure with or without an Eligible Whistleblower's consent if:

- a) the information does not include the Eligible Whistleblower's identity;
- b) GPC has taken all reasonable steps to reduce the risk that the Eligible Whistleblower will be identified from the information; and
- c) It is reasonably necessary for investigating the issues raised in the Protected Disclosure.

The nature of any investigation and the steps taken to protect an Eligible Whistleblower's identity, where required, will be discussed with them, where relevant.

The Eligible Whistleblower also has obligations to preserve confidentiality and not to discuss their Protected Disclosure with work colleagues or other unauthorised persons. Maintaining

confidentiality protects the Eligible Whistleblower against reprisals and victimisation and also protects other people affected by the Protected Disclosure.

Eligible Whistleblowers should be aware that while GPC will make every attempt to keep their details confidential, it cannot guarantee that others will not try to deduce their identity. In practice, it is important to recognise that a Eligible Whistleblower's identity may still be determined if the Eligible Whistleblower has previously mentioned to other people that they are considering making a disclosure, the Discloser is one of a very small number of people with access to the information or the Protected Disclosure relates to information that a Eligible Whistleblower has previously been told privately and in confidence.

### **5.3 Other protections**

Eligible Whistleblowers will be immune from any civil, criminal or administrative liability, including disciplinary action, as a result of making a Protected Disclosure.

However, an Eligible Whistleblower will not have immunity from liability or disciplinary action for any misconduct they have engaged in.

If an Eligible Whistleblower suffers loss or injury because they made or plan to make a Protected Disclosure and GPC failed to take reasonable precautions/exercise due diligence to prevent the detrimental conduct, they may be able to seek compensation or other remedies through the courts. Eligible Whistleblowers should seek independent legal advice prior to commencing any claim for compensation and/or other remedies.

If an Eligible Whistleblower is subject to Detrimental Action or thinks one of these other protections (such as confidentiality) has been breached, they should notify the Whistleblower Coordinator, or persons identified as Eligible Recipients, as soon as possible so GPC can investigate and address this concern. Eligible Whistleblowers can also contact a regulator such as ASIC, APRA or the ATO, or may wish to contact a lawyer.

In addition, at times further or concurrent protections arising from State legislation may apply (for example, where a Protected Disclosure is also a PID the protections detailed GPC's Public Interest Disclosure Procedure will also apply).

## **6 Training**

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GPC will provide training to:

- a) Employees about this Procedure and their rights and obligations under it; and
- b) Eligible Recipients and the Whistleblower Coordinator and those involved in dealing with Protected Disclosures about how to handle and respond to reports.

## **7 Oversight and reporting**

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The Board are the owners of this Procedure. The CEO and Whistleblower Coordinator are responsible for implementation of this Procedure. The CEO and Board will receive a summary of reports made under this Procedure on a monthly basis and de-identified outcomes and learnings from investigations as appropriate.

This Procedure will be periodically reviewed for effectiveness and to check whether any changes are required.

## **8 More information**

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This Procedure will be:

- a) made available to all Employees and consultants via GPC's intranet; and
- b) published online via the GPC website.

Any questions about this Procedure, including questions about making a Protected Disclosure, should be referred to the Whistleblower Coordinator or the Consultant.

This Procedure does not form part of terms of employment and may be amended from time to time.

## 9 Appendices

### 9.1 Appendix 1 – Related documents

#### (a) Legislation and regulation

Key relevant legislation and regulation, as amended from time to time, includes but is not limited to:

Type	Legislation/regulation/guidelines
Federal Acts	<i>Corporations Act 2001</i> (Cth) <i>Taxation Administration Act 1953</i> (Cth)
State Acts	<i>Public Interest Disclosure Act 2010</i> (Qld)
Other	ASIC Regulatory Guide 270 Whistleblower policies

#### (b) Gladstone Ports Corporation documents

The following documents relate to this Procedure:

Type	Document number and title
<b>Tier 1:</b> Policy	#1507461 Code of Conduct Policy #174070 Conflicts of Interest Policy #1439735 People Policy
<b>Tier 2:</b> Standard/Strategy	#87582 Equity, Diversity, Harassment and Discrimination Standard
<b>Tier 3:</b> Specification/ Procedure/Plan	#1641103 Delegated Authority Specification #1686639 Grievance Resolution Management Specification #960456 Managing Discipline Specification #1455068 Gifts and Benefits Procedure

Type	Document number and title
Tier 4: Instruction/Form/Template/Checklist	#1621179 GPC Corporate Glossary Instruction
Other	N/A

## 9.2 Appendix 2 – Revision history

Revision date	Revision description	Author	Endorsed by	Approved by
11/07/2019	v1-3 Published 16/07/2019	Sohana Maharaj, Chief Governance Officer	EMT	Craig Walker, Acting CEO
17/03/2020	v4-5 Published 09/04/2020	Rufus Gandhi, General Counsel	Craig Walker, Acting CEO	Board
25/08/2022	v6 Published 17/02/2023	Mariette Lansdell, Acting Company Secretary	Craig Haymes, CEO	Board
05/04/2024	v7 Contact details updated	Amelia Davey – Business Planning & Corporate Strategy Lead	CEO	Board
[16/07/2024	v8 updated version following internal and external review, including merging 'Internal' and 'External versions into one procedure.	Kylee Lockwood, Acting Company Secretary	Craig Haymes, CEO	Board