



Public Interest Disclosure Procedure

Brief description

GPC is committed to creating and maintaining a workplace where strong ethical standards are upheld and displayed through Employee behaviour. This includes the reporting and management of corrupt conduct and reprisal, legally referred to as a Public Interest Disclosure (“PID”).

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1 Terms and definitions

In this Procedure:

“**CC Act**” means the *Crime and Corruption Act 2001* (Qld).

“**conduct**” includes any act or omission.¹

“**corrupt conduct**” means:

- (a) conduct of a person, regardless of whether the person holds or held an appointment, that:
 - (i) adversely affects, or could adversely affect, directly or indirectly, the performance of functions or the exercise of powers of:
 - (A) a unit of public administration; or
 - (B) a person holding an appointment; and
 - (ii) results, or could result, directly or indirectly, in the performance of functions or the exercise of powers mentioned in paragraph (a), in a way that:
 - (A) is not honest or is not impartial; or
 - (B) involves a breach of the trust placed in a person holding an appointment either knowingly or recklessly; or
 - (C) involves a misuse of information or material acquired in or in connection with the performance of functions or the exercise of powers of a person holding an appointment; and
 - (iii) is engaged in for the purpose of providing a benefit to the person or another person or causing a detriment to another person; and
 - (iv) would, if proved, be:
 - (A) a criminal offence; or
 - (B) a disciplinary breach providing reasonable grounds for terminating the person’s services, if the person is or were the holder of an appointment.
- (b) conduct of a person, regardless of whether the person holds or held an appointment, that:
 - (i) impairs, or could impair, public confidence in public administration; and
 - (ii) involves, or could involve, any of the following:
 - (A) collusive tendering;
 - (B) fraud relating to an application for a licence, permit or other authority under an Act with the purpose or object of any of the following (however described):
 - (1) protecting health or safety of persons;

¹ Source: CC Act.

- (2) protecting the environment;
- (3) protecting or managing the use of the State's natural, cultural, mining or energy resources;
- (C) dishonestly obtaining, or helping someone to dishonestly obtain, a benefit from the payment or application of public funds or the disposition of State assets;
- (D) evading a State tax, levy or duty or otherwise fraudulently causing a loss of State revenue;
- (E) fraudulently obtaining or retaining an appointment; and
- (iii) would, if proved, be:
 - (A) a criminal offence; or
 - (B) a disciplinary breach providing reasonable grounds for terminating the person's services, if the person is or were the holder of an appointment.²

“Crime and Corruption Commission” means the Crime and Corruption Commission established under the CC Act.

“detriment” includes:

- (a) personal injury or prejudice to safety;
- (b) property damage or loss;
- (c) intimidation or harassment;
- (d) adverse discrimination, disadvantage or adverse treatment about career, profession, employment, trade or business;
- (e) financial loss; or
- (f) damage to reputation.³

“Discloser” means an Employee who has made a public interest disclosure under the PID Act.

“Employee Assistance Program” means the confidential counselling service GPC offers to all Employees through Gryphon Psychology, contactable on 1800 056 076.

“Employees” means, for the purpose of this Procedure, an Employee as defined in the GPC Corporate Glossary, and includes a person engaged by GPC under a contract of service.⁴

“Company Secretary” means the GPC employee responsible for governance processes and includes a person engaged by GPC under a contract of service and may include an officer acting in the role.

“natural justice” means refers to the concept of fairness. What natural justice requires will depend on the circumstances but common examples of how it can be provided include actions such as:

² Source: CC Act.

³ Source: PID Act.

⁴ Source: PID Act.

- (a) specifying to the relevant parties the allegations that have been made against them and providing them with any adverse material and information;
- (b) giving each party the opportunity to adequately state their case;
- (c) ensuring that decision/s are made in good faith, without bias; and
- (d) ensuring any decision/s made is supported by the facts or evidence in the matter.

“Oversight Agency” means the Office of the Queensland Ombudsman.⁵

“Public Interest Disclosure” or **“PID”** means a public interest disclosure made by an Employee where the Employee has information about:

- (a) the conduct of another Employee that could, if proved, be corrupt conduct; or
- (b) the conduct of another Employee that could, if proved, be a reprisal that relates to a previous disclosure made by the Employee to GPC or the Crime and Corruption Commission.

In addition, any person could make a PID, in a personal capacity, under section 12 of the PID Act about:

- (a) a substantial and specific danger to the health or safety of a person with a disability;
- (b) an offence or contravention of certain legislation which is or would be a substantial and specific danger to the environment; or
- (c) a reprisal because of a belief that a person has made, or intends to make a disclosure.

A disclosure under section 12 of the PID Act needs to be made to a Proper Authority.⁶

“PID Act” means the *Public Interest Disclosure Act 2010* (Qld).

“PID Coordinator” means an officer of the entity, delegated by the Chief Executive Officer (“CEO”) with responsibility for the implementation of GPC’s PID management program, acting in the capacity of Public Interest Disclosure Coordinator. The CEO delegated the Vendor to act in the capacity of Public Interest Disclosure Coordinator:

Vendor Phone: 1800 693 362

In the event that a disclosure is about the PID Coordinator, the PID Coordinator for that disclosure will be the CEO.

“PID Support Officer” means a person independent of the investigation appointed by the PID Coordinator for a PID, with the appropriate skills and experience in respect of acting as a support officer. In the event that the PID Coordinator does not consider any Employees from the Human Resources (“HR”) team with the skills or experience to be a support officer in respect of a PID, or in the event that a disclosure is about the selected skilled HR team member, the PID Support Officer is to be selected and engaged by the PID Coordinator from a member of GPC’s Legal Panel or a suitably qualified external consultant.

“Proper Authority” means, for a PID under section 12 of the PID Act, a “proper authority” under sections 5 and 6 of the PID Act. Whilst GPC is not a proper authority to receive

⁵ Source: PID Act section 58.

⁶ Source: PID Act section 19 and section 12.

disclosures under section 12, any person can make a disclosure under section 12 to a member of the Legislative Assembly or to an appropriate public sector entity.⁷

Examples of relevant “proper authorities”, depending on the nature of information being disclosed under section 12, include:

- (a) Department of Child Safety, Youth and Women for disclosures about danger to the health and safety of a child or young person with a disability;
- (b) Department of Communities, Disability Services and Seniors for disclosures about danger to the health and safety of a person with a disability;
- (c) Office of the Public Guardian for disclosures about danger to the health and safety of a person with a disability;
- (d) Department of Environment and Science for disclosures about danger to the environment; and
- (e) Crime and Corruption Commission for disclosures about a reprisal that may constitute corrupt conduct.

“reasonable suspicion” means a suspicion which is “reasonable”, in that there is more than bare or idle speculation. In essence, there must be some evidence sufficient for a reasonable person to suspect corrupt conduct. For example, the available facts, evidence or other information must suggest that the allegation, if proven, would amount to corrupt conduct. This “reasonable suspicion” is the trigger point for how a suspected corrupt conduct matter is to be dealt with by GPC pursuant to section 38 of the CC Act and section 156 of the GOC Act.⁸

“reprisal” means causing, attempting or conspiring to cause, detriment to another person because, or in the belief that the other person or someone else:

- (a) has made, or intends to make, a public interest disclosure; or
- (b) is, has been, or intends to be, involved in a proceeding under the PID Act against any person.⁹

“subject Employee” means the Employee whose conduct is the subject of the PID.

“Vendor” has the meaning of the current approved Consultant, awarded Contract through market testing.

“Wrongdoing” has the meaning given in section 3.2 of the Whistleblower Protection Procedure.

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).

⁷ Being the entity:

- (a) to which the information relates;
- (b) that has the power to investigate or remedy the matter; or
- (c) to which a previous disclosure was made that has resulted in reprisal.

⁸ Adapted from the CC Act.

⁹ Adapted from the PID Act.

2 Introduction

2.1 Purpose

GPC and 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 management of corrupt conduct and reprisal.

Every Employee has a legal and ethical responsibility to report corrupt conduct and reprisal action, the reporting of which are legally referred to as Public Interest Disclosures (“**PIDs**”). PIDs are serious matters which warrant diligent attention and management.

This Procedure is intended to facilitate the effective notification, assessment and management of PIDs within GPC in accordance with the PID Act. GPC is committed to encouraging the reporting of PIDs, providing transparent and accessible reporting processes and supporting and protecting Employees and other persons who make a PID.

This PID Procedure applies, and should be read in conjunction with, GPC’s PID Manual and Whistleblower Protection Procedure.

2.2 Scope

This Procedure applies to all Employees, Board members, the CEO and members of the ELT.

The protections in this Procedure apply to all Employees and Board members who make a PID.

This Procedure also applies to anybody making a PID in their personal capacity, in accordance with section 12 of the PID Act to the extent the obligations under the PID Act apply to GPC in relation to that disclosure.

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

2.3 Objectives

The objectives of this Procedure are to set out the framework under which GPC receives, manages and deals with PIDs in order to ensure that:

- (a) Disclosers who make PIDs are given appropriate support;
- (b) PIDs are properly assessed and, when appropriate, properly investigated and dealt with;
- (c) appropriate action is taken in relation to any corrupt conduct that is the subject of a PID;
- (d) a management program for PIDs is developed and implemented; and
- (e) Employees and others are offered protection from reprisals related to a PID.

Employees who come forward with PIDs are assisting GPC to ensure these minimum standards of behaviour are upheld. PIDs are aligned to the principles contained within GPC’s relevant Governance Documents which set minimum standards of behaviour required of all Employees.

When a person comes forward with a PID, GPC commits to:

- (a) protecting the dignity, wellbeing, professional interests and good name of persons involved;
- (b) protecting the Discloser from any reprisal as a result of making the disclosure;
- (c) treating any bullying, harassment, unfair treatment, victimisation or discrimination that results from a disclosure being made as a breach of GPC’s relevant Governance Documents and applicable laws in certain circumstances;
- (d) responding to the disclosure thoroughly and impartially;
- (e) where corrupt conduct has been substantiated, taking appropriate management action;
- (f) keeping the Discloser informed of the progress and outcome; and
- (g) ensuring PID outcomes inform improvements.

Nothing in this Procedure prevents Employees from discussing issues or concerns with their Supervisor or Manager.

Any questions about this Procedure, including questions about making a PID, should be referred to the PID Coordinator or GPC’s reporting hotline.

3 Process

The PID process consists of five (5) key elements, as illustrated below:



3.1 Determine the requirement to disclose

An Employee is required to make a PID if they have information about:

- (a) corrupt conduct; or
- (b) a reprisal that relates to a previous disclosure made.

The Discloser is protected if they honestly and reasonably believe that what they are disclosing has occurred or if it is evident from the information disclosed that what they are disclosing has occurred, even if their belief turns out to be incorrect.

Any person may also make a PID in a personal capacity pursuant to section 12 of the PID Act about:

- (c) a substantial and specific danger to the health or safety of a person with a disability;
- (d) an offence or contravention of certain legislation which is or would be a substantial and specific danger to the environment; or
- (e) a reprisal because of a belief that a person has made, or intends to make a disclosure.

A PID under section 12 of the PID Act will need to be made to an appropriate Proper Authority to deal with. Detail of appropriate “Proper Authorities” are in section 1 of this Procedure. Persons wishing to make a disclosure under section 12 of the PID Act to a Proper Authority

should consult the PID procedures published by those agencies for further details, or contact the PID Coordinator for further information.

Corrupt conduct

If an Employee has information about conduct that amounts to corrupt conduct, they have a duty to report it. To make a disclosure, the Employee must have observed the corrupt conduct, or have reasonable suspicion that the corrupt conduct has occurred.

If an Employee is uncertain as to whether the conduct in question amounts to corrupt conduct, they should seek advice from their Leader in the first instance, or alternatively the PID Coordinator.

Reprisal

Employees also have a duty to report the conduct of another person that amounts to reprisal related to a previous disclosure made.

Reprisal taken against a person who has made a PID is an offence under the PID Act subject to penalty and will not be tolerated. GPC will take all reasonable steps to protect Disclosers from reprisals that are, or may be, taken against them for making a PID. Employees who take reprisal actions may be subject to disciplinary action, up to and including termination of employment. In addition, at times further or concurrent protections arising from the *Corporations Act 2001* (Cth) may apply (for example, where your report is also a report of Wrongdoing, the protections detailed in GPC's Whistleblower Protection Procedure will also apply).

3.2 Make the Public Interest Disclosure

A GPC Employee may make a PID:

- (a) in writing, in person or via telephone; and
- (b) anonymously - however, this may limit the ability of GPC to effectively investigate the PID and to protect the Discloser from reprisal.

In making a PID, a Discloser should provide as much information as possible, preferably in writing, including:

- (c) provide contact details (this could be an email address created for the purpose of making the disclosure or a telephone number);
- (d) provide as much information as possible about the suspected wrongdoing, including:
 - (i) who was involved;
 - (ii) what happened;
 - (iii) when it happened;
 - (iv) where it happened;
 - (v) whether there were any witnesses, and if so who they are;
 - (vi) any evidence that supports the PID, and where the evidence is located; and
 - (vii) any further information that could help investigate the PID.

GPC strongly encourages Disclosers to provide their name when making a disclosure, as this will make it easier for GPC to respond to the disclosure.

More information about how to make a PID is available at section 3 of the PID Manual.

We encourage Disclosers make PIDs to the following people:

- (a) the CEO;
- (b) the PID Coordinator; or
- (c) GPC's confidential reporting hotline on 1800 693 362.

These channels are our core team for receiving reports and are best placed to support Disclosers and deal with PIDs efficiently and confidentially. Contact details are in the terms and definitions section.

More information about how PID recipients carry out this role is available at section 4 of the PID Manual.

Disclosers are encouraged to make a disclosure to an appropriate GPC Representative first. If the matter is not resolved, or the Discloser is concerned about confidentiality, the disclosure may be made to another agency as appropriate. Disclosures can be made to an agency that has a responsibility for investigating the information disclosed:

- (a) Crime and Corruption Commission for disclosures about corrupt conduct including reprisal;
- (b) Queensland Ombudsman for disclosures about maladministration;
- (c) Queensland Audit Office for disclosures about a substantial misuse of resources; or
- (d) a Member of the Legislative Assembly ("MP").¹⁰

3.3 Record the Public Interest Disclosure

GPC has an obligation under the PID Act and the *Public Records Act 2002* (Qld) to keep accurate data about the receipt and management of PIDs.

The PID Coordinator must maintain a proper record of disclosures made, in an official PID database, including:

- (a) the name of the Discloser, if known;
- (b) the information disclosed;
- (c) the name of the agency that referred the disclosure, if applicable;
- (d) any action taken on the disclosure; and
- (e) other relevant information related to the disclosure, including assessments and any review and its outcome.

The PID Coordinator shall provide information about PIDs received by GPC to the CEO upon each instance of disclosure.

¹⁰ A disclosure can also be made to a journalist if a valid PID was initially made and GPC:

- (a) decided not to investigate or deal with the disclosure; or
- (b) investigated the disclosure but did not recommend taking any action; or
- (c) failed to notify the Discloser within six months of making the disclosure whether or not the disclosure was to be investigated or otherwise dealt with.

De-identified high-level information in relation to PIDs received by GPC will be provided to the CEO and the Board on a monthly basis.

GPC must maintain and provide de-identified statistical information in relation to PIDs received by GPC to the:

- (f) shareholding Ministers (quarterly); and
- (g) Crime and Corruption Commission (upon each instance of disclosure that involves, or may involve, corrupt conduct); and
- (h) Oversight Agency (as required).

3.4 Assess the Public Interest Disclosure

Disclosures will be assessed by the PID Coordinator. In the instance of a conflict of interest relating to the PID Coordinator, the disclosure will be assessed by the CEO.

Any disclosure involving the CEO will be assessed by the PID Coordinator for the purposes of that disclosure. If a disclosure about the CEO involves or may involve corrupt conduct of the CEO, the Complaints about the Public Official Policy will apply.

In the event that both the CEO and PID Coordinator are conflicted, the disclosure will be assessed by the Chief Financial Officer who will appoint a member of GPC's Legal Panel to undertake an independent assessment and any follow up actions.

When assessing the disclosure, the PID Coordinator should also consider whether it is a report of Wrongdoing pursuant to GPC's Whistleblower Protection Procedure. If the disclosure is about Wrongdoing, the steps set out in the Whistleblower Protection Procedure may also need to be followed.

Deciding whether a disclosure is a PID

If there is any doubt as to whether a matter is a PID, further information may be obtained to inform the decision. If doubt still remains, the matter will be considered and managed as a PID.

The disclosure will be assessed and dealt with in accordance with the PID Act, this Procedure, the PID Manual and any other relevant procedure(s).

Once the matter has been assessed as a PID, GPC will advise the Discloser:

- (a) that their information has been received and assessed as a PID;
- (b) the action to be taken by GPC in relation to the disclosure, which could include referring the matter to another agency, or investigating;
- (c) the likely timeframe involved;
- (d) the Discloser's obligations regarding confidentiality;
- (e) the protections the Discloser has under the PID Act;
- (f) the commitment of GPC to keep appropriate records and maintain confidentiality, except where required or permitted under the PID Act;
- (g) how updates regarding intended actions and outcomes will be provided to the Discloser; and
- (h) of details for support arrangements and/or the GPC Employee Assistance Program ("EAP").

If the PID has been made anonymously and the Discloser has not provided any contact details, GPC will not be able to acknowledge the PID or provide any updates.

The PID Coordinator will then make a decision as to whether the disclosure is to be investigated or dealt with as a PID.

Investigating a PID

If it is determined that a disclosure is a PID:

- (i) appropriate action shall be taken, which may include investigation or referral to another agency; and
- (j) the PID Coordinator must ensure that, if there is a reasonable suspicion that the matter involves or may involve corrupt conduct, the PID is reported to the Crime and Corruption Commission pursuant to the CC Act and the GOC Act. GPC will follow any direction from the Crime and Corruption Commission as to the investigation or other actions to be taken in response to a PID.

If GPC decides to proceed with an investigation of a PID, it will be managed appropriately and GPC may engage an external investigator. Although every investigation is different, any investigation is to be undertaken in accordance with the principles of natural justice.

Referring a PID

If GPC decides there is another agency or a Proper Authority that is better able to deal with the PID, the PID may be referred to that agency. This may be because:

- (k) the PID concerns wrongdoing by that agency or an employee of that agency; or
- (l) the agency has the power to investigate or remedy the matter.

In these cases, the Discloser will be advised of the action taken by GPC.

Before referring the PID to another agency, GPC will conduct a risk assessment, and will not proceed with the referral if there is an unacceptable risk of reprisal. The PID Coordinator will also contact the Discloser to either obtain their consent before forwarding information to a Proper Authority, or invite the Discloser to redirect the information to the Proper Authority.

It may also be necessary to refer the PID to another agency because of a legislative obligation; for example, to the Crime and Corruption Commission, where there is a reasonable suspicion that the matter involves or may involve corrupt conduct (as required by section 38 of the CC Act and section 156 of the GOC Act). The confidentiality obligations of the PID Act permit appropriate representatives of GPC to communicate with another agency about the referral of a PID. Discretion will be exercised in any contact with any other agency.

Declining to take action on a PID

GPC may decide not to investigate or deal with a PID in various circumstances. These include if:

- (m) the substance of the disclosure has already been investigated or dealt with by another process;
- (n) it is reasonably considered that the disclosure should be dealt with by another appropriate process;
- (o) the age of the information the subject of the disclosure makes it impracticable to investigate;

- (p) it is reasonably considered that the disclosure is too trivial to warrant investigation and that dealing with the disclosure would substantially and unreasonably divert resources from their use in the performance of GPC's functions; or
- (q) another agency that has jurisdiction to investigate the disclosure has notified GPC that investigation of the disclosure is not warranted.

If GPC declines to investigate or deal with a PID, the PID Coordinator must give the Discloser written reasons for that decision. The Discloser may request a review by writing to the CEO within 28 days of receiving the written reasons. If still dissatisfied with the decision, a Discloser may also contact the Oversight Agency to seek a review of the decision.

If a decision is made not to investigate or deal with a PID:

- (r) the Discloser will continue to be offered support in accordance with this Procedure; and
- (s) the matter will be appropriately dealt with (for example, by investigating the matter as a workplace dispute).

3.5 Manage the Public Interest Disclosure

GPC acknowledges that for Employees who are the subject of a PID the experience may be stressful.

For all investigations, the PID Coordinator will conduct a risk assessment of the PID to determine the risk related to preservation of confidentiality and reprisal. This assessment will take into account the actual and reasonably perceived risk of the Discloser suffering detriment, and will include consultation with the Discloser. Consistent with the assessed level of risk, GPC will develop and implement a risk management plan and arrange any reasonably necessary support or protection for the Discloser. The PID Coordinator will also assign a PID Support Officer who is independent of the investigation of the PID to provide support to the Discloser.

In the event of reprisal action being alleged or suspected, GPC will:

- (a) attend to the safety of the Discloser (or witnesses or affected third parties) as a matter of priority;
- (b) review its risk assessment, risk management plan and any protective measures needed to mitigate any further risk of reprisal; and
- (c) manage any allegation of a reprisal as a PID in its own right.

The rights of any person who is subject to, or is in some way associated with, a disclosure will be safeguarded. GPC is committed to applying natural justice to all PID matters and ensuring fair and reasonable treatment for both the Discloser and the subject Employee.

The PID Coordinator must give the Discloser in writing reasonable information about the disclosure, which includes at least the following:

- (d) confirmation that the disclosure was received by GPC;
- (e) a description of the action proposed to be taken, or taken, by GPC in relation to the disclosure; and
- (f) if action has been taken by GPC in relation to the disclosure, a description of the results of the action.

However, GPC will not give information to the Discloser if to do so would be likely to adversely affect:

- (g) anybody's safety;
- (h) the investigation or an offence or possible offence; or
- (i) necessary confidentiality about an informant's existence or identity.

Any identified Discloser and subject Employee shall be offered access to GPC's confidential EAP for support, which is a voluntary counselling service for Employees and their immediate family.

3.6 Confidentiality

Except in the circumstances outlined below, information identifying a Discloser or subject Employee and information disclosed by a PID is to be kept securely and is strictly confidential.

GPC may divulge information about a PID:

- (a) if required to do so for proceedings in a court or tribunal or it authorised to do so by legislation or regulation;
- (b) to discharge an applicable function under the PID Act, for example to investigate the allegations made in a PID or refer the matter to another agency;
- (c) if the Discloser gives consent in writing;
- (d) if the Discloser's consent cannot be reasonably obtained and divulging the information is unlikely to harm their interests and would be reasonable in the circumstances;
- (e) if it is reasonably believed that doing so is necessary to provide for the safety and welfare of a person; or
- (f) if it is necessary under the principles of natural justice and it is unlikely that reprisal action will be taken.

Employees who are found to have breached confidentiality in relation to a PID may be subject to disciplinary action, up to and including termination of employment.

3.7 False or misleading information

Any person making a PID must honestly believe on reasonable grounds that the information tends to show the misconduct. A Discloser must not intentionally provide false or misleading information in making a PID or in connection with the assessment or investigation of a PID.

The intentional provision of false or misleading information in those circumstances is an offence under the PID Act and is subject to a penalty. A Discloser who is found to have intentionally provided false or misleading information will not have the protections normally afforded to a Discloser and, if the Discloser is an Employee, they may be subject to disciplinary action, up to and including termination of employment.

3.8 Reasonable management action

The making of a PID will not affect the ability of GPC to take reasonable management action in relation to a Discloser. The taking of reasonable management action by GPC in relation to a Discloser does not constitute reprisal action.

4 Roles and responsibilities

To assist GPC Representatives to better understand their responsibilities, key responsibilities and accountabilities are summarised below:

Role	Responsibilities
PID Coordinator	<p>The PID Coordinator is responsible for the management of GPC's PID program, which includes:</p> <ul style="list-style-type: none"> • implementing and managing GPC's PID management program; • receiving and assessing PIDs; • deciding whether the disclosure should be investigated and/or dealt with as a PID; • appointing a PID Support Officer to support the Discloser; • assessing the risk of reprisal; • assessing whether it may be necessary to consider reporting to the Crime and Corruption Commission in relation to possible corrupt conduct allegations; • investigating of PIDs where appropriate; • maintaining and updating the PID Register; • providing training and guidance on obligations and protections under the PID Act and under this PID Procedure. • reporting to the CEO as required; and • assisting the CEO with reporting to the Oversight Agency, as required. <p>More information about how the PID Coordinator carries out this role is available at section 5 of the PID Manual.</p>
Company Secretary	<p>The Company Secretary is responsible for:</p> <ul style="list-style-type: none"> • reporting to the Board and CEO; • reporting to the Oversight Agency as required; and • providing training and guidance on obligations and protections under the PID Act and under this PID Procedure. <p>More information about how the Company Secretary carries out this role is available at section 9 of the PID Manual.</p>
PID Support Officer	<p>The PID Support Officer is responsible for:</p>

Role	Responsibilities
	<ul style="list-style-type: none"> • supporting and communicating with Disclosers, subject Employees and witnesses; and • providing input to the PID Coordinator for risk assessments and risk management plans. <p>More information about how the PID Support Officer carries out this role is available at section 6 of the PID Manual.</p>
Investigator	<p>An appropriate investigator will be appointed for each PID investigated depending upon the type of disclosure and other relevant considerations. The investigator may be responsible for:</p> <ul style="list-style-type: none"> • conducting an investigation of information in the PID in accordance with a terms of reference; and • preparing the report for delegated decision-maker. <p>More information about how the investigator carries out this role is available at section 7 of the PID Manual.</p>
Leaders and CEO	<p>All Leaders are responsible for:</p> <ul style="list-style-type: none"> • communicating the expectation that all Employees are required to undertake their duties to the high ethical standards and always act in the public interest; • creating and supporting a workplace culture that promotes ethical decision making, impartiality and integrity, and accountability and transparency; • demonstrating positive ethical standards and values to Employees through their own conduct and communications at work; • creating a supportive reporting environment and providing appropriate support to Employees who report suspected or observed corrupt conduct; and • ensuring Employees are aware of their responsibilities in making a PID and advising of the appropriate reporting process. <p>The CEO has specific responsibilities under the PID Act. More information is available in section 8 of the PID Manual.</p>
Employees	<p>All Employees are responsible for:</p> <ul style="list-style-type: none"> • not engaging in corrupt conduct or reprisal action; • conducting their duties to a high professional and ethical standard; • seeking appropriate management guidance if they face an ethical dilemma; and

Role	Responsibilities
	<ul style="list-style-type: none"> immediately reporting suspected or observed corrupt conduct.

5 Appendices

5.1 Appendix 1 – Related documents

(a) Gladstone Ports Corporation documents

The following documents relate to this Procedure:

Type	Document number and title
Tier 1: Policy	#1507461 Code of Conduct #1409930 Complaints about the Public Official Policy
Tier 2: Standard/Strategy	N/A
Tier 3: Specification/ Procedure/Plan	#1593454 Whistleblower Protection Procedure #1641103 Delegated Authority Specification
Tier 4: Instruction/Form/ Template/Checklist	#1621179 Corporate Glossary #1658976 Corrupt Conduct Assessment Form
Other	#1593453 PID Manual

5.2 Appendix 2 – Revision history

Revision date	Revision description	Author	Endorsed by	Approved by
24/09/20	v12 created in accordance with Governance Documentation Framework Standard and legal review by Herbert Smith Freehills.	Mariette Lansdell, Deputy Company Secretary	Rufus Gandhi, Legal Counsel and Company Secretary	Board
26/05/22	Reviewed to address role changes.	Mariette Lansdell, Acting Company Secretary	Craig Haymes, Chief Executive Officer	Board
25/08/2022	Updated to address QAO deficiencies and reflect	Mariette Lansdell, Acting	Craig Haymes, Chief	Board

Revision date	Revision description	Author	Endorsed by	Approved by
	changes in reporting lines v13 published on 31/01/2022	Company Secretary	Executive Officer	
15/12/2023	V14 – remove reference to roles and replace with Vendor, update hotline phone number	Adam Butson - Senior Legal Counsel Governance Amelia Davey – Business Planning & Corporate Strategy Lead	CEO	Board