



AMMA Whistleblower Policy

1. Purpose

The purpose of this policy is to provide a safe, transparent, and confidential mechanism for reporting concerns about misconduct, unethical behaviour, or breaches of law within Australasian Military Medicine Association Ltd (AMMA). This policy ensures compliance with the Corporations Act 2001 (Cth) and supports AMMA's commitment to integrity, accountability, and good governance.

2. Scope

This policy applies to all:

- AMMA Directors, Officers, Committee Members, and volunteers;
- Employees, contractors, and consultants engaged by AMMA or The Management Company Pty Ltd in support of AMMA's operations; and
- Former officers, employees, or contractors who wish to report misconduct discovered during their engagement with AMMA.

It covers any conduct that may be illegal, unethical, improper, or inconsistent with AMMA's values, Constitution, or policies.

3. Legislative Context

This policy has been developed in accordance with:

- Corporations Act 2001 (Cth), Part 9.4AAA – Protection for Whistleblowers;
- Taxation Administration Act 1953 (Cth) (where applicable); and
- Australian Charities and Not-for-profits Commission (ACNC) Governance Standards.

Under this legislation, whistleblowers are protected when they make a disclosure that meets the legal definition of an 'eligible disclosure'.

4. What Can Be Reported

A whistleblower may report any reasonable suspicion of:

- Dishonest, fraudulent, or corrupt conduct;
- Misuse or misappropriation of AMMA funds or assets;
- Breach of AMMA's Constitution, policies, or delegations;
- Conduct endangering the health or safety of an individual;



- Unlawful discrimination, harassment, or bullying;
- Breach of privacy or misuse of confidential information;
- Any attempt to conceal misconduct.

Personal grievances (e.g. interpersonal disputes or employment issues) are generally not covered under this policy unless they involve systemic misconduct or victimisation for raising concerns.

5. Who Can Make a Disclosure

Protected disclosures may be made by:

- Current or former Directors, Officers, employees, volunteers, or contractors;
- A supplier or their employee;
- A relative or dependent of any of the above.

Disclosures may be made anonymously, and protection will still apply.

6. Protection for Whistleblowers

Under the Corporations Act 2001, whistleblowers are entitled to legal protection if the disclosure is made in good faith and on reasonable grounds. These include:

- Confidentiality: AMMA must not disclose the whistleblower's identity without consent, except where required by law.
- Protection from Detriment: Whistleblowers are protected from dismissal, demotion, harassment, discrimination, or any form of retaliation.
- Immunity: Whistleblowers are not subject to civil, criminal, or administrative liability for making a protected disclosure.
- Compensation: A whistleblower may seek compensation if they suffer loss, damage, or injury as a result of detrimental conduct.

7. How to Make a Disclosure

7.1 Internal Reporting Channels

A disclosure can be made verbally or in writing to any of the following Eligible Recipients:

- The President (primary contact for all disclosures)
- Vice President (if the disclosure concerns the President)
- The Management Company Association Manager (for operational matters)
- AMMA Board (through the Company Secretary or designated governance contact)



Reports can be made by:

- Email to: secretariat@amma.asn.au with the subject: “Strictly Confidential – Whistleblower Report”
- In writing, marked “Strictly Confidential – Whistleblower Report”
- Verbally via phone or in person to an Eligible Recipient.

7.2 External Reporting Channels

A disclosure can also be made directly to:

- ASIC (Australian Securities and Investments Commission)
- ACNC (Australian Charities and Not-for-profits Commission)
- AFP (Australian Federal Police)

If the matter involves potential tax misconduct, it can be reported to the ATO under relevant whistleblower provisions.

8. Investigation Process

- All disclosures will be acknowledged within 10 business days of receipt.
- The President (or delegate) will appoint an impartial investigator, which may include an external party if appropriate.
- Investigations will be conducted fairly, confidentially, and without bias.
- Findings will be reported to the AMMA Board, excluding any individual named in the allegation.
- The whistleblower will be advised of the outcome where appropriate and legally permissible.

9. Confidentiality and Records

- All records relating to a disclosure and investigation will be maintained securely and confidentially within AMMA’s SharePoint system, managed by The Management Company and backed up under 5GN’s ISO 27001 environment.
- Only authorised persons will have access to these records.
- Identifying details will not be included in reports unless consent is provided.

10. False or Malicious Reports

Reports made in good faith will be protected. However, deliberately false, vexatious, or misleading disclosures may result in disciplinary action.



11. Roles and Responsibilities

Role	Responsibility
Board of Directors	Ensures AMMA maintains a fair, confidential, and compliant process for handling disclosures.
President	Acts as the primary contact for receiving and assessing disclosures. Ensures impartial investigation and reports to the Board.
Vice President	Acts in place of the President where required or where the disclosure concerns the President.
Association Manager	Supports administrative handling, confidentiality, and communication with the whistleblower (as appropriate).
All AMMA Representatives	Must cooperate with investigations and maintain strict confidentiality.

12. Related Documents

- AMMA Code of Conduct and Director Conduct Policy
- AMMA Fraud & Corruption Prevention Policy
- AMMA Complaints & Grievances Policy
- AMMA Conflict of Interest Policy
- Corporations Act 2001 (Cth), Part 9.4AAA

13. Review

This policy will be reviewed every two years, or sooner if legislative amendments or organisational changes require.