

PASPALLEY

WHISTLEBLOWER POLICY

Purpose and introduction

Paspaley Pearls Group (**PPG**) is committed to maintaining a culture of compliance, honesty and ethical behavior in every aspect of its business, as set out in its Corporate Code of Conduct and other Policies. Such a culture relies on all those involved in PPG's business raising questions and concerns freely and promptly, including any concern about misconduct, an improper state of affairs or circumstances, or illegal conduct. Indeed, PPG's policies often require reporting of actual or suspected behaviour or matters of this type. Early detection allows PPG to identify and address possible issues or matters of concern, before they become larger problems.

This Policy supports and encourages an open compliance culture by clearly identifying PPG's commitments and identifying:

- a range of options for reporting suspected misconduct or an improper state of affairs or circumstances (referred to as Improper Conduct or an Improper State of Affairs– see definition, below), including options to do so anonymously;
- processes for managing and responding to such reports, including an appropriate investigation, reporting of progress and outcomes, corrective measures and disciplinary action; and
- protections for persons reporting suspected Improper Conduct or an Improper State of Affairs, including confidentiality measures and prohibition of any retaliation against anyone who makes a report of suspected Improper Conduct or an Improper State of Affairs based on reasonable grounds.

Scope: Who does this policy apply to?

This Policy applies to all current or former PPG:

- (a) directors;
- (b) officers;
- (c) employees;
- (d) contractors;
- (e) consultants;
- (f) agents;
- (g) associates;
- (h) suppliers of goods or services to PPG and their employees; and

a relative or dependant of any of the above, and a dependant of the spouse of any of the above.

In this Policy, these people are referred to as **PPG Personnel**.

This Policy applies to PPG Personnel whether they are or were employed on a full-time, part-time, fixed term, casual or temporary basis.

Those with whom PPG does business are also invited and encouraged to notify PPG of any suspected Improper Conduct or an Improper State of Affairs, either through their PPG contact, or through PPG's Executive Director, Chief Financial Officer or Chief Operating Officer.

This Policy applies in addition to any Commonwealth or State laws that may also provide protections to whistleblowers.

Definitions

Improper Conduct or an Improper State of Affairs means misconduct or an improper state of affairs or circumstances. This may include conduct or a state of affairs or circumstances which is:

- (a) dishonest;
- (b) fraudulent;
- (c) corrupt;
- (d) illegal (including theft, drug sales/use, violence or threatened violence and criminal damage against property);
- (e) a breach of any regulations or laws which apply to PPG;
- (f) a serious breach of PPG's policies, including its Code of Conduct (HRM.006);
- (g) dangerous to the health and safety of individuals, animals or the environment;
- (h) a significant threat to the stability of or confidence in the financial system;
- (i) a breach of human rights;
- (j) negligent;
- (k) engaging in or threatening to engage in Retaliation or adverse action; or
- (l) other serious Improper Conduct or an Improper State of Affairs.

It **does not include** personal, work related grievances, such as a grievance about a matter in relation to the discloser's employment, or former employment, or which tends to have implications for the discloser personally, and does not have significant implications for PPG unrelated to the discloser. Examples of grievances that may be personal work-related grievances (and not reports of Improper Conduct or an Improper State of Affairs) include an interpersonal conflict between the discloser and another employee, and decisions relating to the terms and conditions of engagement of the discloser, including remuneration, transfer, promotion, suspension, disciplinary action, or termination. Such matters should be addressed in accordance with other appropriate PPG policies. PPG's Human Resources division can assist with the resolution of personal work related grievances.

Some reports involving a personal, work-related grievance may also include reference to matters involving Improper Conduct or an Improper State of Affairs (a **mixed report**). A mixed report will be treated as a Whistleblower report covered by the provisions of this Whistleblower Policy.

Paspaley Pearls Group (PPG) refers to the group of related companies (and each company in the group) of which Pearl Corporation of Australia Pty Ltd is the ultimate holding company.

Retaliation or adverse action is conduct including harassment, intimidation (including a threat, whether express or implied, conditional or unconditional), discrimination, bias, demotion, dismissal or other disadvantage or harm to a person (including physical or psychological harm), or their financial position, property or reputation which conduct occurs, in part or in whole, because a Whistleblower made, attempted to make, or is believed or suspected to have made a report of Improper Conduct or an Improper State of Affairs. Retaliation or adverse action does not include administrative action that is reasonable for the purpose of protecting a Whistleblower from detriment (for example, moving a Whistleblower who has made a disclosure about their immediate work area to another office to protect them from detriment). Retaliation or adverse action also does not include managing a Whistleblower's unsatisfactory



work performance, if that management is in line with PPG's performance management framework.

Whistleblower means any PPG Personnel who, whether anonymously or not, makes, or attempts to make a report about Improper Conduct or an Improper State of Affairs where they have reasonable grounds to suspect that the information reported concerns Improper Conduct or an Improper State of Affairs in relation to PPG.

Whistleblower Protection Officers (WPO) are the person(s) who have responsibility for protecting Whistleblowers in accordance with this Policy. Their role is described more fully in this Policy. PPG has appointed two persons to this position, one to be PPG's principal WPO and another for those circumstances when the principal WPO is not available. As circumstances require, other persons may be appointed as WPOs. (Attached to this Policy are the names of the current Whistleblower Protection Officers.)

Whistleblower Investigation Officer (WIO) means the PPG person appointed by the WPO to conduct a preliminary investigation into a report received from a Whistleblower. The identity of this person will vary depending on the matters reported but will not be the WPO, nor will it be a person involved in the matters reported. Their role is described more fully in this Policy.

How do you make a report of Improper Conduct or an Improper State of Affairs?

PPG Personnel are encouraged to report any suspected instances of Improper Conduct or an Improper State of Affairs.

PPG encourages people to report Improper Conduct or an Improper State of Affairs, where possible and appropriate, to an officer or senior manager of PPG, the CEO, or, if the matter involves those persons or you feel it necessary, the Chairman. (Attached to this policy is a list of those positions within PPG which PPG regards as 'senior managers' for the purposes of this Policy.)

PPG recognises that there may be times when it is not comfortable or appropriate to report Improper Conduct or an Improper State of Affairs to a person mentioned above.

PPG Personnel can also report Improper Conduct or an Improper State of Affairs by availing themselves of an independent, external third-party whistleblower service, called Paspaley Whistleblower Service, contracted by PPG in order to facilitate the submission of confidential and anonymous reports.

A person may make a Whistleblower report using this service:-

- (a) by the confidential online portal access at: australia.deloitte-halo.com/pws
- (b) by freecall telephone call on: 1800 997 645
- (c) by email to: pws@deloitte.com
- (d) by mail to: Paspaley Whistleblower Service
Reply Paid 12628
A'Beckett Street
Melbourne Victoria 8006
- (e) by fax to: +61 3 9691 8182

Reports made via these facilities will be shared, on an encrypted basis, with the Whistleblower Protection Officer through a secure external system. The Whistleblower Protection Officer will then deal with them as set out below under the heading 'The Whistleblower Protection Officer'.

Further details about this service may be found at: australia.deloitte-halo.com/pws



PPG personnel can also report Improper Conduct or an Improper State of Affairs by contacting the Whistleblower Protection Officer directly. Contact details are set out in the attachment to this Policy. It is recommended that any person who wishes to make a confidential report or remain anonymous contact the Whistleblower Protection Officer by mail or by email using an email address that does not identify you. If a report is being made to the Whistleblower Protection Officer directly, the person making the report should consider including the following information (as far as possible) to enable an effective investigation to take place:

- what Improper Conduct or State of Affairs do you suspect or believe has occurred?
- who do you believe is involved?
- when do you believe the conduct or state of affairs occurred?
- who else do you believe knows about the conduct or state of affairs?
- do you believe any PPG policies have been breached? If so, which?
- are you aware of any evidence (documents or witnesses)? If so, what or who?
- have you made any previous reports about the conduct or state of affairs?

In any event, a report of Improper Conduct or an Improper State of Affairs to a PPG officer, senior manager, auditor (or member of an audit team conducting an audit), or a person authorised under this Policy to receive a Whistleblower report, will be treated in accordance with this Policy.

Nothing in this Policy or any other document or procedure at PPG prevents you from or requires approval for, reporting what you have reasonable grounds to suspect concerns Improper Conduct or an Improper State of Affairs in relation to PPG to an appropriate government authority or from seeking legal advice, including advice in relation to your rights about disclosing information.

The Whistleblower Protection Officer

It is the role of the Whistleblower Protection Officer to support and safeguard the interests of the Whistleblower. The WPO will follow the procedure attached to the end of this Policy in connection with a Whistleblower report and will:

- receive Whistleblower reports;
- identify and appoint an appropriate WIO to investigate the Improper Conduct or an Improper State of Affairs contained in the report;
- keep the Whistleblower appropriately informed as to the status and outcome of the investigation; and
- provide practical assistance to the Whistleblower in relation to their rights and obligations under this policy.

The WPO will have access to independent financial, legal and operational advisors as required.

The Whistleblower Investigation Officer

The Whistleblower Investigation Officer (WIO) will be appointed by the WPO to investigate the report of Improper Conduct or an Improper State of Affairs. The WPO may consider appointing persons such as the PPG CFO or COO, alternatively, an external person, to act as WIO. The WIO will be a person uninvolved in the matters reported and should also not have direct responsibility for the supervision of affected persons or operations. The WIO will have access to independent financial, legal and operational advisors as required, and may delegate appropriately.



The WIO will conduct a preliminary investigation in order to determine whether there may be evidence to support the matters raised, or whether the report is clearly without basis. If the WIO is satisfied that a full investigation is required, the WIO will:

- formulate a strategy to conduct an investigation (including consideration of the need for legal or other specialist advice or assistance);
- conduct the investigation in accordance with the strategy developed and the procedure attached to this Policy;
- inform the WPO about the progress, expected timeframes and outcomes of the investigation, so the WPO can keep the whistleblower informed; and
- report to the PPG Executive Director, PPG Executive Chairman or the Board of Paspaley Pearling Company Pty Ltd on the findings of the investigation and recommendations in light of it.

Investigations under this Policy will be conducted fairly and in accordance with any current applicable Whistleblower procedure and in accordance with the principles of natural justice. This means, amongst other things, that the investigation will be conducted without bias and every person against whom an allegation is made will be given the right to respond as appropriate.

Throughout the investigation process, all reasonable steps must be taken to ensure that the identity of the Whistleblower is kept confidential. This includes only disclosing information that is likely to lead to the identification of the Whistleblower where reasonably necessary for the purposes of the investigation, and taking all reasonable steps to reduce the risk that the Whistleblower is identified as a result of the disclosure of information in the course of the investigation.

What happens after you make a whistleblower report?

Once a whistleblower report is made, the Whistleblower will be afforded all of the protections that are set out in this Policy. The Whistleblower will also receive protections under relevant Commonwealth and State laws, where they apply. In particular, the protections provided by the *Corporations Act 2001* (Cth) (the **Corporations Act**) apply.

The person to whom the report is made must not disclose the identity of the Whistleblower unless he or she has the consent of the Whistleblower to do so.

To ensure that all reports are appropriately pursued and investigated, the person to whom the report is made must:

- where the person notified is not a WPO, notify a WPO of the report and its contents (but not the identity of the whistleblower if they have asked for the disclosure to be handled confidentially), unless the WPO is alleged to be involved in the matters reported, in which case PPG's General Counsel should be notified; and
- where possible to do so (eg, where it is possible to contact the Whistleblower), inform the Whistleblower that a WPO has been so notified.

The person to whom a whistleblower report is made does not have discretion to take *no* action.

In making the report, the Whistleblower consents to the report and its contents being disclosed in accordance with this Policy. The WPO and WIO will then act as set out above and in accordance with the procedure attached to this Policy.

Raising concerns anonymously

If PPG Personnel would like to make an anonymous report, they may do so in writing to a WPO or otherwise as set out above under the heading 'How do you make a report of Improper Conduct or an Improper State of Affairs?'



PPG will respect the decision of any Whistleblower who chooses to make a report anonymously, and will take all reasonable measures to protect their anonymity. However, a Whistleblower should consider the following factors in deciding whether to make a report anonymously:

- PPG's ability to properly investigate an anonymous report may be constrained, especially if the report leaves out key facts or information and there is no way to contact the Whistleblower to seek further information;
- PPG will also be unable to ensure an anonymous Whistleblower is afforded the protections available to them;
- PPG may also be unable to update an anonymous Whistleblower on the status or outcomes of the investigation if there is no way to contact the Whistleblower.

With this in mind, PPG encourages anonymous Whistleblowers to take steps to remain in contact with the WPO, including by providing a means of contact with which the Whistleblower is comfortable (such as an anonymous email address). The independent external whistleblower service contracted by PPG enables Whistleblowers to remain anonymous whilst maintaining contact with the WPO.

Protections afforded to Whistleblowers

Confidentiality

PPG will not disclose the identity of a Whistleblower without the consent of the whistleblower, except as necessary or appropriate to a regulator or law enforcement authority (such as ASIC, APRA or the AFP) or to legal counsel. In addition, though it is likely to be necessary to disclose some of the information reported by the Whistleblower in order to investigate the matters reported, PPG will take all reasonable steps to reduce any risk that a Whistleblower will be identified as a result of any such disclosure.

Retaliation not tolerated

PPG will not tolerate any Retaliation against a Whistleblower. Anyone with reasonable grounds to suspect that the information reported concerns misconduct or an improper state of affairs in relation to PPG will be protected against Retaliation.

PPG will take all reasonable measures to ensure that a Whistleblower, and any person who participates in an investigation of Improper Conduct or an Improper State of Affairs, will be protected from any form of Retaliation by PPG or PPG Personnel.

A Whistleblower or other PPG Personnel should immediately advise a WPO if they believe they or another PPG Personnel (or their family or dependants) have been subject to Retaliation due in part to a belief or suspicion that a person has made, may make or could make a report of Improper Conduct or an Improper state of Affairs. The WPO will investigate the retaliation claim and take appropriate measures to protect the Whistleblower. Where Retaliation is alleged, the procedures outlined in PPG's Anti-Discrimination and Equal Employment Opportunity Policy HRM.003 may be initiated.

Retaliation against PPG Personnel due in part or in whole to an actual, suspected or possible future Whistleblower report is considered to be misconduct, and a person who is found to have engaged in Retaliation may be subject to disciplinary action, which could include termination of their employment or services agreement.

A Whistleblower who has been involved in the reported misconduct will still be subject to the reasonable consequences of their own actions (misconduct); however, their disclosure will be taken into consideration as a mitigating factor by PPG in determining those consequences. To be clear, there will be no action taken by PPG against any PPG Personnel for the act of making a Whistleblower report.



Other Support and protections

Whistleblowers will be supported and their interests safeguarded by a WPO.

This Policy provides broad protections for Whistleblowers, and PPG is committed to encouraging all with concerns to speak up. There are also protections and rights offered to Whistleblowers under various laws, including some state laws, and some Commonwealth laws, such as the *Corporations Act 2001* (Cth) and *Taxation Administration Act*. Depending on the circumstances, some additional protections may apply, including:

- Protection from legal action for making a Whistleblower report to senior management or company auditors in some circumstances;
- A Whistleblower's identity must be kept confidential. A court or tribunal may not compel disclosure of their identity, and the information reported by a Whistleblower may not be admissible evidence in certain legal proceedings against them (unless they have provided false information); and
- Anyone who experiences Retaliation for making (or being suspected of making or possibly making in the future) a Whistleblower report, may be entitled to compensation or another remedy in certain circumstances.

Protections are available not just for disclosures of information concerning Improper Conduct or an Improper State of Affairs made to PPG, but also for such disclosures made to relevant authorities, such as ASIC, APRA, the AFP or another Commonwealth body prescribed by regulation (a **Cth Regulatory Body**).

In addition, protections are available for 'public interest' or 'emergency' disclosures to a Member of Commonwealth or State Parliament or Legislature of a Territory (a **parliamentarian**), or a journalist as follows:

Public Interest Disclosure: where the discloser has reasonable grounds to believe that the disclosure is in the 'public interest', the discloser may disclose information to a parliamentarian or journalist and such a disclosure will be protected, so long as:

- an earlier protected disclosure was made to a Cth Regulatory Body, and at least 90 days has passed since that disclosure;
- the discloser does not have reasonable grounds to believe that action has been or is being taken to address the matters raised in the earlier disclosure;
- after the 90 days has passed and before the proposed disclosure to a parliamentarian or a journalist, the discloser gives the Cth Regulatory Body written notification that includes sufficient information to allow it to identify the previous disclosure to it, and states that the discloser intends to make a public interest disclosure.

Emergency Disclosure: where the discloser has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment, the discloser may disclose information to a parliamentarian or journalist and such a disclosure will be protected, so long as:

- an earlier protected disclosure was made to a Cth Regulatory Body;
- before making the proposed disclosure to a member of Parliament or a journalist, the discloser gives the Cth Regulatory Body written notification that includes sufficient information to allow it to identify the previous disclosure to it, and states that the discloser intends to make an emergency disclosure; and
- the extent of the information disclosed is no greater than necessary to inform the recipient of the substantial and imminent danger.



Disclosures to a legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the whistleblower provisions in the Corporations Act are also protected.

False Reports

Making a Whistleblower report is a serious matter and such a report should only be made where there is a reasonable basis to suspect Improper Conduct or an Improper State of Affairs.

No action will be taken against an individual making a Whistleblower report with a reasonable basis to suspect Improper Conduct or an Improper State of Affairs, regardless of whether any actual Improper Conduct or an Improper State of Affairs is identified upon investigation. However, intentionally making a false report may lead to disciplinary action, including termination of employment in serious cases.

Reporting to PPG Executive Director and Board

Whistleblower reports from PPG Personnel are taken seriously and form part of regular reporting to senior management and the Board. Every month, the WPO will provide the PPG Executive Director with a summary of all matters reported by Whistleblowers and outcomes.

Document Retention and Confidentiality

All information, documents, records and reports relating to the investigation of reported misconduct will be confidentially stored and retained, so as to protect confidentiality

Do you still have questions?

Not all situations which may arise in the conduct of business can be directly addressed in a policy. PPG Personnel should bring their own reason, propriety and judgement to a situation based on the principles set out in this Policy.

If you require further guidance as to this Policy, please ask your Immediate Manager and/or Manager-once-Removed or a PPG Human Resources representative; alternatively, feel free to direct your enquiry to the PPG General Counsel.

PPG encourages you to ask questions and raise matters which may be of concern. Open communication and discussion about issues of concern is the best way to ensure that PPG's business is conducted successfully, in accordance with our business ethics and compliance with laws.

In addition, ASIC and the ATO provide guidance on their websites in respect of Whistleblower protection and related laws. ASIC's Information Sheet 239 How ASIC handles whistleblower reports is readily available from: <https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/how-asic-handles-whistleblower-reports/>

Review

This Policy is to be reviewed:

- (a) as soon as practicable after a key change in the nature or scope of PPG's activities or relevant laws; or
- (b) otherwise, at least once every two years.

Date Policy implemented: 20 December 2019



ATTACHMENT TO WHISTLEBLOWER POLICY

A. Whistleblower Procedure: Step by Step Guide

Below is a step by step guide that will be followed by the WPO and WIO in conducting investigations under this Policy.

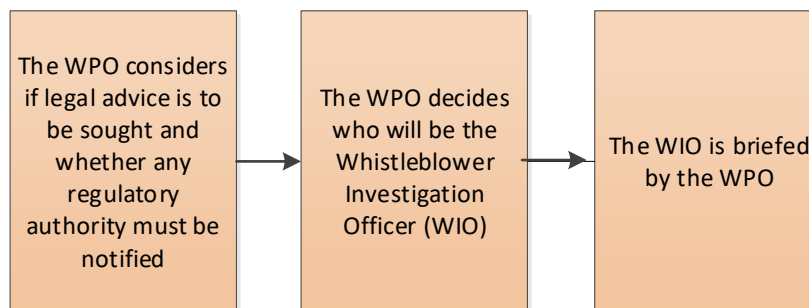
Step 1 – WPO Documentation

If a Whistleblower report is not made directly to a WPO, it will be provided (by the person receiving the report or automatically through the external service provider) to the WPO as soon as possible after receipt. The WPO will document the receipt of the report, including all details known to date. If a Whistleblower makes their identity known to the WPO but requests their report be treated confidentially, the WPO will keep the Whistleblower's identity confidential unless the Whistleblower consents to their identity being disclosed. (For the avoidance of doubt, if a Whistleblower makes a report to someone other than the WPO in accordance with this Policy, that person will not disclose the Whistleblower's identity to the WPO unless the Whistleblower consents to their identity being so disclosed.) A WPO will protect the confidentiality of reported matters as well as anonymity if applicable.

The WPO will consider how the Whistleblower Policy applies to the disclosure and will also consider whether the disclosure is protected under law, such as the *Corporations Act 2001* (Cth) (which has provisions for protection of whistleblowers). The WPO will take all reasonable measures to meet its obligations in managing the Whistleblower report.

Step 2 – Whistleblower Investigation Officer (WIO) Nominated and Briefed

Once the WPO receives a Whistleblower report, the next step is to identify a Whistleblower Investigation Officer as follows:

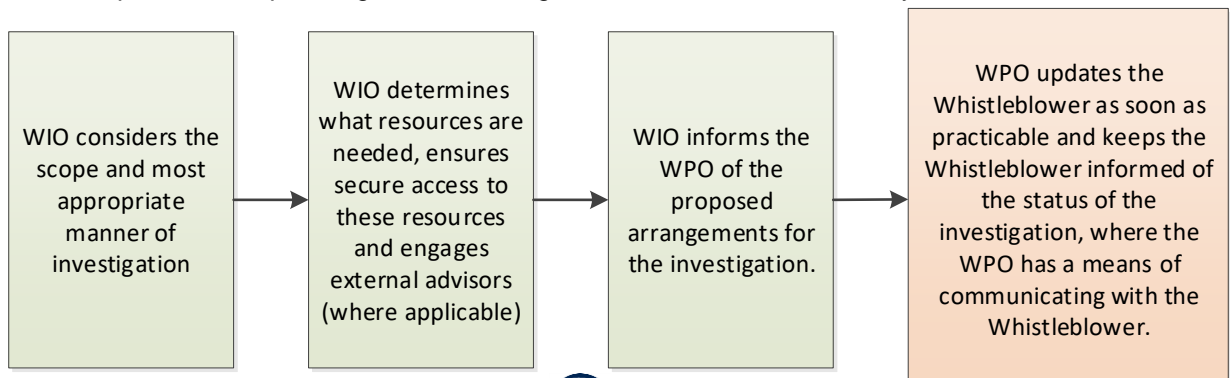


In some circumstances, appointment of an external WIO may be appropriate or necessary. This will be considered by the WPO when deciding who to appoint.

The WPO will also advise the appropriate GM that a Whistleblower Report has been made.

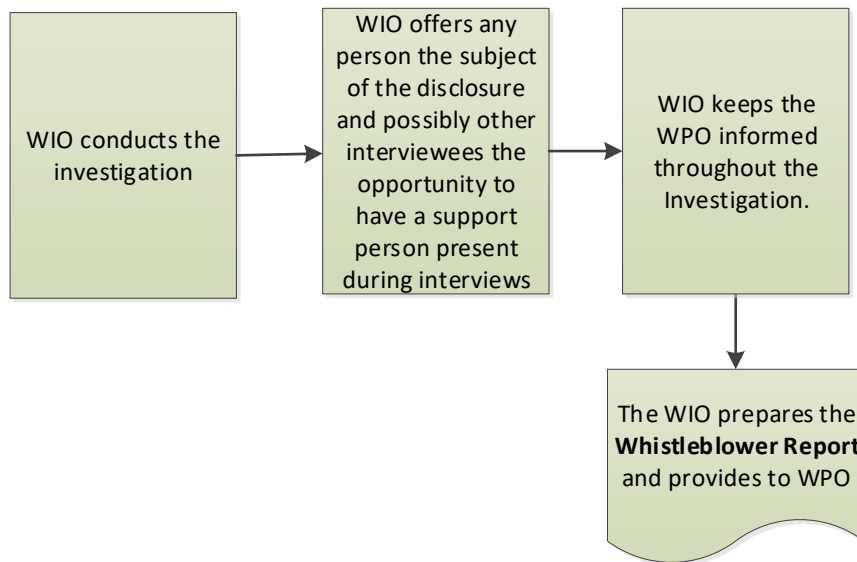
Step 3 – Plan Investigation

This step covers the planning for the investigation of the concerns raised by the Whistleblower:



By the end of Step 3, a clear plan for the investigation of the concerns raised by the Whistleblower will be developed and settled by the WIO. Depending on the nature of the matters reported, certain additional measures may need to be taken at this stage, e.g. in the case of possible corrupt conduct or other significant matters, involvement of and supervision of the investigation by the Board and engagement of outside counsel.

Step 4 – Investigation



This step concerns the investigation into the concerns raised by the Whistleblower and is primarily actioned by the WIO.

As part of the investigation, the WIO will:

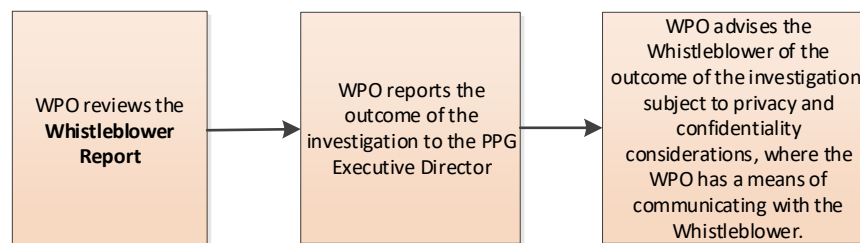
- review all issues raised by the Whistleblower;
- ensure that appropriate measures for the protection of relevant documents and information are taken (in consultation with the WPO and PPG’s General Counsel);
- properly document the investigation (including witness interviews).

The WIO will ensure that appropriate records are kept of each phase of the investigation.

By the end of Step 4, a thorough and effective investigation has been conducted.

Step 5 – Investigation Close-Out

This is the final step and incorporates finalising the concerns raised by the Whistleblower:



As soon as is practicable, the WIO will prepare a report to the PPG Executive Director or (as appropriate), PPG Executive Chairman or the Board of Paspaley Pearling Company Pty Ltd, who will ensure that appropriate measures are taken in light of the report. The report should identify as far as possible:



how the Improper Conduct or an Improper State of Affairs was revealed. (For the avoidance of doubt, a Whistleblower's identity will not be disclosed where they have asked for their disclosure to be treated confidentially);

- the timeframe in which the Improper Conduct or an Improper State of Affairs was committed;
- the impact of the conduct, including any loss involved;
- how the Improper Conduct or an Improper State of Affairs was committed;
- who committed the Improper Conduct or an Improper State of Affairs;
- the actions taken or being taken to stop the Improper Conduct or an Improper State of Affairs re-occurring; and
- any action which has or may be taken to recover the loss or damage.

The WIO should be mindful of obligations to report certain breaches to relevant authorities, for example, to ASIC under the Corporations Act or to OHS officers, law enforcement or others.



ATTACHMENT TO WHISTLEBLOWER POLICY

B. Whistleblower Contact Information

Whistleblower Protection Officers

- Principal WPO: Kym Coffey
Telephone: 0429 105 163
Email: kcoffey@paspaley.com.au
- Additional WPO: Sam Buchanan
Telephone: (08) 8982 5444 or 0409 870 864
Email: sbuchanan@paspaley.com.au

By mail (the envelope should be marked 'Strictly Confidential') addressed to:

Whistleblower Protection Officer
Paspaley Pearls Group
GPO Box 338
Darwin NT 0801

Alternatively, the letter can be delivered to the reception of any PPG premises.

Whistleblowers, who wish to remain anonymous, should not submit reports to WPOs directly via their PPG email account or any other email account which identifies them. Persons wishing to submit reports electronically are encouraged to use PPG's independent externally provided facilities. [Refer to section of Policy entitled "How do you make a report of Improper Conduct or an Improper State of Affairs?"]

Senior Managers

The *Corporations Act 2001* defines a 'senior manager' to mean, in relation to a corporation, as follows:

A person (other than a director or secretary of the corporation), who:-

- makes, or participates in making, decisions that affect the whole, or a substantial part, of the business of the corporation; or*
- has the capacity to affect significantly the corporation's financial standing.*

Whether or not a person is a 'senior manager' as defined by the *Corporations Act 2001* will, ultimately, depend on the particular facts and circumstances of the person's role.

Solely for the purposes of its Whistleblower Policy and Procedure, however, PPG regards the following positions within PPG as those of 'senior managers':-

- Head Office: Chief Operating Officer
Chief Financial Officer
General Counsel



- Pearling: General Manager – Pearling Production
Operations Manager – Pearling Production
Senior Farm Support Manager
Spat Production Manager
- Rural: General Manager – Rural Properties
Kurrajong Park Farm Manager
- Retail: General Manager – Global Retail
Head of Operations – Retail
Head of Marketing
- PME: General Manager
Operations Manager
- Aviation: General Manager
- Properties: General Manager

Note 1: The above is not an exclusive list nor does it constitute an acknowledgement or admission by PPG that the above positions, or the persons occupying them from time to time, are 'senior managers' for the purposes of the *Corporations Act 2001*.

Note 2: As indicated in the Policy, reports may also be made to 'officers' of PPG. 'Officers' include the directors and company secretary of each PPG company.

