

# Speak Up Policy



## 1. Scope

1. This policy applies to all Pacific Edge ("Pacific Edge") employees and contractors (collectively "Workers").

## 2. Introduction and purpose

- 2.1 This policy is an overarching policy designed to ensure that Pacific Edge Workers are aware and encouraged to raise concerns regarding actual or suspected wrong doing with regard to ethical, clinical, professional and legal standards in a safe, supportive and protected environment.
- 2.2 The policy aims to facilitate the disclosure of unacceptable behaviours and/or practices in Pacific Edge. This is designed to enable the ongoing monitoring of the business and behaviours of governance and management. Accordingly this is designed to foster and encourage acceptable, proper and professional individual conduct.
- 2.3 The intent of the Speak-up Policy is to highlight the Company's approach to an open-door environment where senior management are alerted at the early stages of potential or actual unacceptable behaviour before there are any impacts or consequences. This policy aims to support and reinforce the Company's core values, Professional Standards, and Code of Ethics.
- 2.4 This policy will be published internally and provided on the Company's website. This policy will communicate the Company's intention toward unacceptable behaviour and to provide the necessary processes to capture and address any issues with regard to unacceptable behaviour, as they arise.
- 2.5 If a Worker has a concern or disclosure, such persons are encouraged to report this to the appropriate Manager or to the Company's external Human Resources providers.

### **3. Speak-up Disclosure**

3.1 For the purposes of making a disclosure under this policy, matters may include, but are not limited to, any actual or suspected:

- Conduct or practices which are dishonest, illegal or breach any law;
- Breach of any company policy including the Company's Code of Conduct and Ethics;
- Breach of patient confidentiality;
- Sexual harassment;
- Inappropriate accounting, internal accounting controls or auditing matters;
- Corrupt activities;
- Theft, fraud or misappropriation of assets;
- Significant mismanagement or waste of funds or resources;
- Abuse of authority; or
- Unsafe work practice or environment.

3.2 The Company will identify, review and act on all good faith complaints or disclosures. The Company expects that all such good faith disclosures are truthful and can be substantiated.

3.3 Depending on the issue, there are a variety of ways to address these, which are detailed in the following policies:

- Employee Complaints and Grievances (NZ)
- Protected Disclosures Policy

### **4. Relevant legislation**

- Protected Disclosures Act 2000
- Employment Relations Act 2000
- Health and Safety at Work Act 2015
- Human Rights Act 1993
- Harassment Act 1997

### **5. External Human Resources Provider**

5.1 Pacific Edge's external Human Resources provider is:

- a. Anderson Lloyd  
Malcolm Couling (Senior Associate)  
DDI: 03 471 5495  
Email: malcolm.couling@al.nz

This Policy should be read in conjunction with:

- Ethical Behaviour Policy
- Protected Disclosures Policy
- Protected Disclosures Act 2000

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