

SPEAK-UP, WHISTLEBLOWER AND COMPLAINTS POLICY

VG-ETH-009-PUB



PURPOSE

This policy provides practical routes for raising concerns about conduct, governance, research, safety, data, community impacts or other matters connected with Valhalla.

PUBLIC COMMITMENT

- People may raise genuine concerns without needing to prove the matter first.
- Reports will be handled as confidentially and fairly as reasonably practicable.
- Retaliation against a person who raises a genuine concern is prohibited.

STATUS	Published
POLICY OWNER	Managing Director
PROPOSED APPROVER	Valhalla Board
PUBLICATION	Published v1.0

1. Application and governance approach

Valhalla is an Australian-based private company. This document is applied in a practical and adaptable manner, with controls suited to the nature and risk of the activity. The Managing Director may set or adjust implementation arrangements, subject to law, contracts and matters reserved to the Valhalla Board. Ordinary operations may proceed within approved budgets and delegations. A significant departure from ordinary operations, material change, unusual commitment, new jurisdiction or matter outside approved authority must be documented and approved before implementation, including by the Valhalla Board where required.

Valhalla may not maintain a dedicated hotline or investigation team. Reports may therefore be handled by the Managing Director, a non-conflicted director or an appropriately qualified external adviser, depending on the subject and seriousness of the concern.

2. Matters that may be raised

- suspected unlawful, dishonest, corrupt, unsafe or seriously unethical conduct;
- research misconduct, improper sponsor influence, falsification or suppression of material results;
- misuse of funds, data, systems, intellectual property or confidential information;
- retaliation, bullying, harassment, discrimination or serious workplace concerns;
- material privacy, cybersecurity, AI, environmental, cultural heritage, community or human-rights concerns; and
- conduct that could cause significant financial or reputational harm to Valhalla or a partner.

Routine questions, interpersonal disagreements or service complaints may also be raised, although they may be managed through a simpler resolution process.

3. How to raise a concern

A concern may be raised with the Managing Director, the Chair or another director. Where current reporting details are provided on Valhalla's website or in a project agreement, those channels may also be used. A

person may ask to remain anonymous, although anonymity can limit the ability to investigate or provide feedback.

4. Initial assessment and response

Valhalla will consider the nature, urgency, available information, conflicts, legal obligations and potential harm. The response may include clarification, informal resolution, preservation of evidence, an internal review, appointment of an external investigator, suspension of an activity, corrective action or referral to a partner, regulator or law-enforcement authority.

The process and level of documentation will be proportionate to the matter. Procedural fairness will be considered, including an opportunity for a person affected by an allegation to respond where appropriate.

5. Confidentiality and protection

Information will be shared only with people who reasonably need it for assessment, support, legal compliance or response. Absolute confidentiality cannot be guaranteed where disclosure is required by law, necessary to address a serious risk or essential to a fair process.

Retaliation, intimidation or disadvantage because a person raised a genuine concern or assisted an inquiry is prohibited. Applicable statutory whistleblower protections are not limited by this policy.

6. False reports and records

A report made honestly will not be treated as misconduct merely because it is not substantiated. Knowingly false or malicious allegations may be addressed under the Code of Conduct. Records will be kept securely and only to the extent reasonably required.

Related documents

- Code of Conduct and Ethics
- Research Integrity and Academic Independence Policy
- Security and Responsible Disclosure Statement
- Human Rights and Modern Slavery Policy

Document control and approval

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PUBLICATION CONTROL Published v1.0. This is the current website publication. Procedures may be adapted proportionately, but any substantive amendment to the published commitments requires controlled review, approval and versioning.