

# Whistleblowing Policy

## 1 Overview

### 1.1 Purpose

This Whistleblowing Policy (**Policy**) is one of a number of policies within Evans Dixon Limited and its subsidiaries (together **Evans Dixon**) which are documented to align with the firm's expected standards of conduct and culture. This Policy aims to promote a culture of compliance, honesty and ethical integrity by providing an avenue, without fear of persecution or intimidation, for the reporting of improper conduct or behaviour (i.e. wrongdoing). Improper conduct or behaviour may relate to Evans Dixon's business activities, licensing conditions, internal policies and other standards of behaviour expected of Evans Dixon employees.

This Policy is designed to meet the requirements of the Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 (**Whistleblower Laws**) and any other applicable financial services laws and principles (including the ASX Corporate Governance Principles) which apply to Evans Dixon.

### 1.2 Scope

This Policy applies to all persons deemed current or former employees, suppliers, executives, directors, partners and contractors employed or contracted by Evans Dixon in Australia. It also applies to associates of Evans Dixon and any spouse, relative or dependant of the aforementioned people.

### 1.3 Policy

This Policy forms part of the firm's risk management and corporate governance framework and is considered a vital tool to identify wrongdoing which may exist within the firm. It outlines safe and secure methods for the reporting of wrongdoing, in an effort to encourage the reporting of wrongdoing, deter wrongdoing, and highlight wrongdoing which may have not otherwise been uncovered.

Evans Dixon's Board of Directors encourage all individuals associated with Evans Dixon to report wrongdoings. This Policy aims to encourage the reporting of suspected instances of wrongdoing that could potentially harm Evans Dixon's employees, its assets, and the firm's long-term sustainability and reputation.

## 2 Key Concepts

### 2.1 Whistleblower

A whistleblower is a person who reports wrongdoing which has occurred or continues to occur within Evans Dixon.

The Corporations Act 2001 (**Corporations Act**) recognises and protects whistleblowers that meet the criteria detailed below.



Under the Whistleblower laws, the following persons (including their spouse, relatives or dependents) are deemed *eligible whistleblowers* if they are or have been:

- ◇ an officer of the firm;
- ◇ an employee of the firm;
- ◇ an individual who supplies services or goods to the firm;
- ◇ an employee of a person that supplies services or goods to the firm; or
- ◇ an individual who is an associate of the firm.

The above list of persons takes into account all persons who operate in a permanent, part time, fixed term or temporary, intern, seconded, manager and director role. Further, supplying of services are considered to include contractors, consultants, service providers, suppliers and business partners.

A whistleblower qualifies for protection under the Corporations Act if they are an eligible whistleblower and:

- ◇ have made a disclosure of information relating to a 'disclosable matter' directly to an 'eligible recipient' or to ASIC, the Australian Prudential Regulation Authority (**APRA**) or another Commonwealth body prescribed by regulation;
- ◇ have made a disclosure 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; or
- ◇ they have made an 'emergency disclosure' or 'public interest disclosure'.

## 2.2 Disclosable matters

Disclosable matters relate to matters that a discloser has reasonable grounds to suspect concerns misconduct, or an improper state of affairs or circumstances, in relation to Evans Dixon. Further, disclosable matters include where there are reasonable grounds to suspect that the firm (including its employees or officers) have engaged in conduct that:

- ◇ constitutes an offence against, or a contravention of, a provision of any of the following:
  - a) the Corporations Act;
  - b) the Australian Securities and Investments Commission Act 2001;
  - c) the Banking Act 1959;
  - d) the Financial Sector (Collection of Data) Act 2001;
  - e) the Insurance Act 1973;
  - f) the Life Insurance Act 1995;
  - g) the National Consumer Credit Protection Act 2009;
  - h) the Superannuation Industry (Supervision) Act 1993;
- ◇ constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more;
- ◇ represents a danger to the public or the financial system;
- ◇ is prescribed by regulation;

- ◇ is dishonest or unethical with regards to the firm's behaviour and practices;
- ◇ may cause harm;
- ◇ is prohibited by the firm's code of conduct; or
- ◇ is a significant risk to public safety or the stability of, or confidence in, the financial system.

'Misconduct' refers to fraud, negligence, default, breach of trust and breach of duty. 'Improper state of affairs' is not defined under law. Together, misconduct or an improper state of affairs need not necessarily indicate unlawful conduct, however, may indicate a systemic issue which prohibits the proper functioning of the firm or practices which may cause consumer harm.

'Reasonable grounds to suspect' is based on objective reasonableness of the reason for suspicion – allegations need not be proven, however an allegation without supporting information is unlikely to be considered as reasonable grounds to suspect.

### 2.3 Wrongdoing

Activities considered by Evans Dixon as 'wrongdoing' and could be considered a disclosable matter may include, but are not limited to:

- ◇ breach of legislation and regulation governing Evans Dixon's business activity;
- ◇ deliberate and/or reckless disregard for Evans Dixon's policies and codes;
- ◇ conduct that is deemed to cause damage to Evans Dixon's financial position and reputation, or bring it into disrepute;
- ◇ fraudulent activity, money laundering or misappropriation of funds;
- ◇ offering or accepting a bribe, or engaging in corrupt behaviour;
- ◇ impeding internal or external audit processes;
- ◇ conduct endangering health, safety or the environment;
- ◇ other illegal activity (including theft, illicit drug sale / use, violence or threat of violence, and property damage);
- ◇ abuse or mistreatment of clients, employees or the general public;
- ◇ engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made or be planning to make a disclosure;
- ◇ a substantial mismanagement of Evans Dixon's resources; and
- ◇ concealment of impropriety.

### 2.4 Personal work-related grievances

Personal work-related grievances are not considered wrongdoing and are not captured under this Policy or afforded protections under the Corporations Act. Examples of work-related grievances include but are not limited to:

- ◇ Interpersonal conflict between the discloser and another employee;
- ◇ A decision that does not involve a breach of workplace laws;
- ◇ A decision about the engagement, transfer or promotion of the discloser;
- ◇ A decision about the terms and conditions of engagement of the discloser;

- ◇ A decision to suspend or terminate the engagement of the discloser, or otherwise to discipline the discloser; and
- ◇ frivolous issues.

Workplace grievances remain the jurisdiction of the Fair Work Act 2009, however they may still qualify for protection if the disclosure:

- ◇ includes information about misconduct;
- ◇ the firm has breached employment or other laws punishable by imprisonment for a period of 12 months or more, or information about misconduct includes or is accompanied by a personal work-related grievance (mixed report);
- ◇ the discloser suffers from or is threatened with detriment for making a disclosure; or
- ◇ the discloser seeks legal advice or representation about the operation of the whistleblower protections under the Corporations Act.

## 2.5 Eligible Recipients

Eligible recipients are responsible for the receipt of disclosures relating to wrongdoing. For a whistleblower to obtain appropriate protections under the law, the disclosure must be made directly to an eligible recipient. Note that there are no protections afforded under the Corporations Act for disclosures made to non-eligible recipients. The following personnel are deemed eligible recipients by Evans Dixon:

- ◇ Whistleblower Protection Officer – Head of People & Culture
- ◇ Alternative Contact 1 – Chief Risk Officer
- ◇ Alternative Contact 2 – Head of Compliance
- ◇ Alternative Contact 2 – Chief Executive Officer
- ◇ Officer or Senior Manager (including Directors, Executive / Senior Management and Divisional Heads)
- ◇ KPMG (via the KPMG FairCall service)
- ◇ An internal or external auditor or actuary of the firm

See [section 4.1](#) for more details.

## 2.6 Whistleblower Protection Officer

Evans Dixon have appointed a Whistleblower Protection Officer (**WB Protection Officer**) who is responsible for the following:

- ◇ Act as the main point of escalation for all whistleblowing matters;
- ◇ Maintain responsibility for the protection of whistleblowers from detriment;
- ◇ Provide counsel to personnel looking to understand features and operations of the Whistleblowing Policy;
- ◇ Provide appropriate reporting to relevant boards/committees for any whistleblowing issues escalated; and
- ◇ Monitor the Whistleblowing framework and identify any required amendments or enhancements.

## 3 Whistleblower Protections

### 3.1 Evans Dixon's commitment to Whistleblower protections

Individuals who report wrongdoings will not be discriminated against or disadvantaged in employment with Evans Dixon for making a report in accordance with this Policy. Evans Dixon will also strive to ensure that suspected Whistleblowers (including their colleagues and relatives) are not subject to reprisals, harassment or victimisation due to their actions in making a report. Evans Dixon will take all reasonable steps to ensure that adequate and appropriate protection is being provided for those who become a Whistleblower. This protection applies if the matter is proven or not, regardless of whether it is reported to an external authority.

### 3.2 Protections awarded under the Corporations Act

In order to be recognised and protected as a whistleblower under the Corporations Act, a discloser must meet all of the following criteria:

1. Ensure they are deemed an *eligible whistleblower* (refer to section 2.1);
2. Ensure that the disclosure relates to a *disclosable matter* (misconduct or improper state of affairs) based on reasonable grounds to suspect (refer to section 2.2); and
3. Ensure the disclosure is made to an *eligible recipient* (refer to section 2.5).

Note that a disclosure qualifies for protection even where an investigation identifies that no misconduct or improper state of affairs had occurred.

Whistleblower protection afforded by Evans Dixon per the requirements of the Corporations Act includes:

- ◇ Identity protection (confidentiality);
- ◇ Protection from detrimental acts or omissions;
- ◇ Compensation and other remedies; and
- ◇ Civil, criminal and administrative liability protection.

These protections are discussed in more detail below. Note these protections apply to disclosures made via all internal and external reporting channels.

#### Identity protection (confidentiality)

If a whistleblower states they wish to remain anonymous, the Evans Dixon will take all reasonable steps ensure the identity of the discloser is not revealed, nor information produced (directly or indirectly) that is likely to lead to the identification of a discloser.

Note there are certain exemptions from the provision relating to identity protection, specifically where the discloser's identity is disclosed:

- a) With the consent of a discloser;
- b) To ASIC, APRA or a member of the Australian Federal Police;
- c) To a legal practitioner (for the purposes of obtaining legal advice or representation about the whistleblower provisions within the Corporations Act); or
- d) To any person or body prescribed by the regulations.

In addition to the above, consent to disclose information relating to a disclosure need not be sought in the following circumstances:

- a) The information does not include the discloser's identity;
- b) All reasonable steps have been taken to reduce the risk that the discloser's identity may become known based on the information disclosed; and
- c) It is reasonably necessary for investigating the issues raised in the disclosure.

### **Protection from detrimental acts or omissions**

A whistleblower is protected under the Corporations Act from detrimental conduct caused as a result of an eligible disclosure. The Corporations Act makes it a criminal offence to victimise a whistleblower due to a protected disclosure being made (or where a disclosure is suspected or proposed to be made). All employees are expected to not engage in any activity which breaches the firm's Harassment and Bullying Policy, including causing detriment to any whistleblower. Some examples of detrimental conduct include:

- ◇ Threats to cause detriment, whether express or implied, or conditional or unconditional;
- ◇ Harm or injury (including psychological);
- ◇ Harassment or intimidation;
- ◇ Dismissal from employment;
- ◇ Damage to the person including their property, reputation, business or financial position;
- ◇ Alteration of employee's position of duties to their disadvantage; and
- ◇ Discrimination.

In some cases, certain actions may not be considered detrimental conduct, for example:

- ◇ Reasonable administrative action for the purposes of protecting a discloser from detriment; and
- ◇ Management of unsatisfactory work performance in line with the firm's performance management framework.

Where any of the above actions take place, the reasons for those actions will be explained to the discloser.

### **Compensation and other remedies**

The Corporations Act provides for a discloser to seek compensation and other remedies through the courts in the following circumstances:

- ◇ Where the discloser suffers loss, damage or injury because of a disclosure; and
- ◇ Where the firm failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

The firm encourages disclosers to seek independent legal advice when considering whether to seek compensation and other remedies.

### **Civil, criminal and administrative liability protection**

The Corporations Act protects disclosers from any of the following in relation to their disclosure:

- ◇ Civil liability;
- ◇ Criminal liability (other than for making a false disclosure); and
- ◇ Administrative liability.

The protections do not grant immunity for any misconduct a discloser has engaged in that is revealed in a disclosure or identified as part of the associated investigation.

### **Applicable Penalties**

Evans Dixon recognises that under the Corporations Act the following maximum civil penalties for breaching confidentiality of an eligible whistleblower's identity or causing or threatening detriment may apply:

- ◇ For individuals – up to 5,000 penalty units (approximately \$1.05 million)
- ◇ For body corporates – up to 50,000 penalty units (approximately \$10.5 million) or 10% of the annual turnover (up to 5 million penalty units or approximately \$525 million)

## **4 Whistleblowing Reporting**

### **4.1 Internal reporting channels**

Whistleblowers may elect to provide a disclosure verbally or in writing to any of the below personnel which have been deemed an eligible recipient. It is expected that in most circumstances, each of the below eligible recipients will subsequently engage the WB Protection Officer on the same business day or as soon as reasonably practicable to act as the main person responsible for ensuring the appropriate handling and investigation of the disclosure (except where the disclosure relates to the WB Protection Officer or consent has not been provided to share information regarding the disclosure).

#### **Designated Senior Management and Officers**

It is anticipated that in most circumstances it will be appropriate for whistleblowers to make a disclosure to the relevant executive / senior member of the management team. For the avoidance of doubt, a whistleblower should consider the heads of the following departments as designated senior management:

- Executive Management – CEO, CFO
- Head of Wealth Advice
- Head of Corporate and Institutional
- Head of Funds Management

Whistleblowers may also elect to make a disclosure to an officer of the firm (refer to section 2.5 for further detail).

#### **Whistleblower Protection Officer – Head of People & Culture**

The WB Protection Officer may receive disclosures directly or be provided with the details of a disclosure from an eligible recipient who received the original disclosure.

The WB Protection Officer is also responsible for the disclosure handling and investigation process.

#### **Chief Risk Officer (CRO) / Head of Compliance**

If a Whistleblower is not comfortable disclosing the matter to a designated senior manager or the WB Protection Officer (e.g. the disclosure may relate to one of those persons), the Whistleblower may report to the CRO or Head of Compliance. The CRO or Head of Compliance may also act as an alternative for the WB Protection Officer with regards to executing the responsibilities relating to the handling and investigation of a disclosure.

The CRO and Head of Compliance are also the primary and secondary contacts for any questions regarding the Whistleblowing framework.

**Evans Dixon Chief Executive Officer**

If a Whistleblower is not comfortable disclosing the matter to a designated senior manager, the WB Protection Officer or the CRO / Head of Compliance (e.g. the disclosure may relate to one of those persons), the Whistleblower may report to the Evans Dixon Chief Executive Officer. The Evans Dixon Chief Executive Officer may also act as an alternative for the WB Protection Officer with regards to executing the responsibilities relating to the handling and investigation of a disclosure.

**Other Senior Management**

Evans Dixon recognises that Senior Managers as defined under section 9 of the Corporations Act are deemed eligible recipients. Under the legislation, senior managers refer to persons who make or participate in making decisions that affect the whole or a substantial part of the business, or have the capacity to affect significantly the corporation’s financial standing.

For the purposes of this policy, divisional and/or team heads are considered senior management. Depending on the nature of the report or function/size of the division, whistleblowers may find it beneficial to first report the wrongdoing with their divisional/team head, who will appropriately escalate to the WB Protection Officer. It should be noted depending on the situation, it is the firm’s preference for disclosures to be made via one of the other channels above where possible – this will assist with appropriate separation of duties relating to the management of the disclosure compared to the ongoing management of employees and their duties (for discloser and other employees referred to in the disclosure).

**4.2 KPMG FairCall – Approved external reporting channel**

Evans Dixon has partnered with KPMG to provide an external Whistleblower hotline service. The KPMG FairCall reporting channel is an external, independently monitored and dedicated service for the disclosure reporting, and provides the capability for anonymous disclosures. The FairCall service is available 24/7 through four different channels:

Communication method	Contact details	Number	KPMG Office Location
Telephone	Australia	1800 500 965	Australia & South Africa
Website	<a href="https://www.kpmgfaircall.kpmg.com.au/evansdixon">https://www.kpmgfaircall.kpmg.com.au/evansdixon</a>		
Post	The <i>FairCall</i> Manager KPMG Forensic PO Box H67 Australia Square Sydney NSW 1213		
Fax	+61 2 9335 7466		
Approved Evans Dixon Contacts	<u>Primary Contact</u> : Head of People and Culture <u>Alternate Contact 1</u> : Chief Risk Officer <u>Alternate Contact 2</u> : Head of Compliance <u>Alternate Contact 3</u> : Chief Executive Officer		



If a discloser is not an employee of Evans Dixon, they can utilise the KPMG FairCall service or alternatively contact the Head of People and Culture directly.

### 4.3 Other reporting channels

Evans Dixon acknowledges that disclosures can be made to the following external bodies directly and still qualify for protections under the Corporations Act:

- ◇ Regulatory bodies including ASIC, APRA, ATO or another prescribed Commonwealth Body;
- ◇ Evans Dixon's internal or external auditor or actuary;
- ◇ Journalists (must be deemed a 'public interest disclosure' or 'emergency disclosure'); and
- ◇ Politicians (must be deemed a 'public interest disclosure' or 'emergency disclosure').

Evans Dixon further acknowledges that disclosures made to a legal practitioner for the purposes of obtaining legal advice or legal representation related to the Whistleblower provisions under the Corporations Act are also protected.

### 4.4 Anonymous reporting

Evans Dixon provides for anonymous reporting of wrongdoing via the internal reporting channels (eligible recipients are trained to maintain anonymity where requested) or via the KPMG FairCall reporting channel. Should an individual wish to remain anonymous when reporting wrongdoing, Evans Dixon will ensure strict confidentiality is maintained by all parties involved in the case, to protect the identity of the individual (e.g. through redaction of certain details, gender-neutral references, and handling of disclosures by qualified staff). This includes preventing the release of information that would likely lead to the identity of the Whistleblower. A number of the following practices may be used by the firm to assist with maintaining confidentiality:

- ◇ Redaction of certain report details / use of general-neutral references;
- ◇ Handling of disclosures by qualified staff;
- ◇ Secure storage of relevant documents and materials relating to the disclosure;
- ◇ Utilise secure methods of communication with a discloser; and
- ◇ Designated personnel responsible for performance the handling and investigation of a disclosure who will be appropriately briefed on the requirements relating to confidentiality.

Anonymous disclosures are protected under the Corporations Act, and disclosers may elect to remain anonymous while making the disclosure, over the course of the investigation and after the investigation is finalised. A discloser may also refuse to provide certain information where it may reveal their identity.

While anonymous reporting is accessible, it should be noted that anonymous reporting may have the unintended consequence of increasing the complexity associated with protecting the unknown individual from detriment, as well as increase the difficulty of providing any relevant investigation updates or obtaining additional information to assist with an in investigation, which may subsequently limit the success of any investigation undertaken by the firm.

### 4.5 False reporting

The firm does not encourage deliberate false reporting, that is where the discloser reports information they know to be untrue. Individuals who deliberately submit false responses will not be

able to access the whistleblower protections available under the Corporations Act. Further, deliberate false reports may unnecessarily harm the firm's reputation as well as the reputation of any individuals who are mentioned in the report. Persons who provide deliberate false reports may be subject to various penalties and consequences.

Note: false reporting differs to disclosures made in good faith whereby the discloser reasonably suspected misconduct, however the suspicions were later determined to be unfounded. Such instances would be deemed protected disclosures.

#### 4.6 Whistleblower support

Evans Dixon is committed to protecting whistleblowers from detriment, and has a number of controls in place in order to prevent such detriment from occurring:

- ◇ It respects any requests by whistleblowers to remain anonymous and does not disclose the whistleblower's identity unless otherwise authorised by the whistleblower;
- ◇ Training is provided to all staff highlighting the benefits of the Whistleblowing Policy;
- ◇ The firm has adopted a Harassment and Bullying Policy with appropriate disciplinary action in place for any employee who breaches the Policy; and
- ◇ Whistleblower Reporting is a standing item at the periodic Evans Dixon Audit, Risk and Compliance Committee Meeting.

Evans Dixon also recognises that employees can be adversely affected by misconduct (including the reporting of that misconduct). Evans Dixon has partnered with Assure to provide an Employee Assistance Program. The Program provides free and confidential support by an experienced psychologist to all employees.

Phone: 1800 808 374

Web: [assureprograms.com.au](http://assureprograms.com.au)

Separately, Evans Dixon will consider alternative working arrangements where an employee who is a discloser has considered that it will assist with protection from detriment or will support their ability to perform the duties relating to their employment.

Where a discloser believes they have or are suffering detriment as a result of their disclosure (including breach of confidentiality where applicable), it should be immediately reported to the WB Protection Officer who is responsible for investigation and any subsequent required actions. A discloser may also seek independent advice or contact regulatory bodies if they believe they have suffered detriment.

#### 4.7 Public interest or emergency disclosures

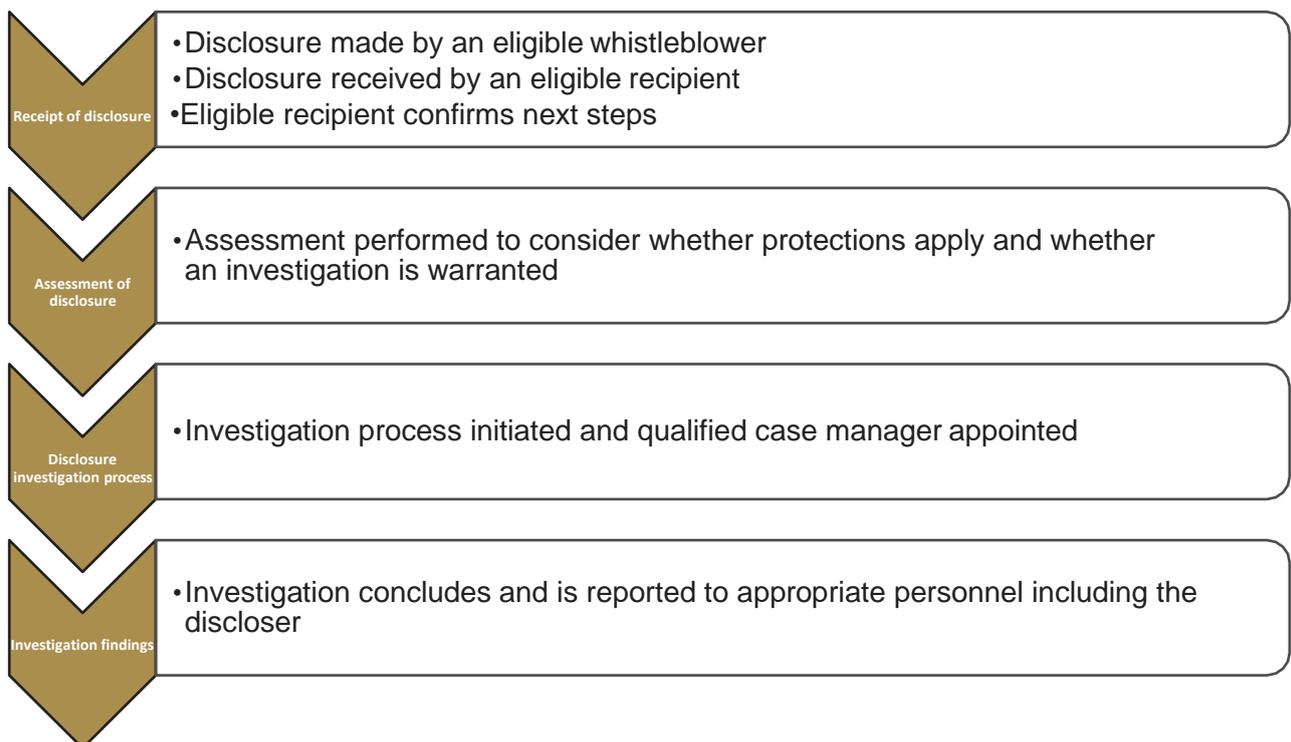
Evans Dixon acknowledges that protected disclosures can be made to journalists or politicians in limited circumstances:

- ◇ A 'public interest disclosure' is the disclosure of information to a journalist or a parliamentarian, where:
  - a) at least 90 days have passed since the discloser made the disclosure to ASIC, APRA or another Commonwealth body prescribed by regulation;
  - b) the discloser does not have reasonable grounds to believe that action is being, or has been taken, in relation to their disclosure;

- c) the discloser has reasonable grounds to believe that making a further disclosure of the information is in the public interest; and
  - d) before making the public interest disclosure, the discloser has given written notice to the body in RG 270.75(a) (i.e. the body to which the previous disclosure was made) that:
    - (i) includes sufficient information to identify the previous disclosure; and
    - (ii) states that the discloser intends to make a public interest disclosure.
- ◇ An 'emergency disclosure' is the disclosure of information to a journalist or parliamentarian, where:
- a) the discloser has previously made a disclosure of the information to ASIC, APRA or another Commonwealth body prescribed by regulation;
  - b) 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;
  - c) before making the emergency disclosure, the discloser has given written notice to the body in RG 270.76(a) (i.e. the body to which the previous disclosure was made) that:
    - (i) includes sufficient information to identify the previous disclosure; and
    - (ii) states that the discloser intends to make an emergency disclosure; and
  - d) the extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the journalist or parliamentarian of the substantial and imminent danger

Whistleblowers should understand the above criteria and should seek independent legal advice before making a public interest or emergency disclosure.

## 5 Whistleblower Report Handling and Investigation



## 5.1 Receipt of a disclosure

Upon receipt of a disclosure by an eligible recipient, the following actions will take place:

- a) Consider whether the receipt of the disclosure at that particular time/location is appropriate, and if not, coordinate for alternative arrangements to receive the disclosure;
- b) Obtain appropriate information in order for appropriate designated personnel to perform and initial assessment of the disclosure; and
- c) Obtain consent from the discloser regarding what information may be disclosed and who that information may be disclosed to (e.g. confirmation of whether the identity of the discloser or details relating to the disclosure can be provided, and to who this detail is limited to, such as the WB Protection Officer, the associated investigation case manager and the Board).

## 5.2 Initial assessment of a disclosure

Where practicable, the WB Protection Officer is responsible for the initial assessment of a disclosure, which includes:

- a) Assessing whether the disclosure qualifies for protection
- b) Considering whether investigation is required, and the details of that investigation
  - a. Nature and scope of the investigation
  - b. Person(s) within and/or outside the entity that should lead the investigation
  - c. Nature of any technical, financial or legal advice that may be required to support the investigation
  - d. The timeframe for the investigation
- c) Conduct a risk of detriment assessment
  - a. Risk identification: Assessing whether anyone may have a motive to cause detriment
  - b. Risk analysis and evaluation: Analysing and evaluating the likelihood of each risk, and evaluating the associated severity
  - c. Risk control: Develop and implement strategies to prevent or contain any risks
  - d. Risk monitoring: Establish a strategy to monitor and reassess the risk of detriment where appropriate

## 5.3 Disclosure investigation process

Upon receipt of the disclosure or details relating to the disclosure, the WB Protection Officer (or the alternate contact where applicable) will consider and appoint an appropriately qualified Whistleblowing Case Officer (**WB Case Officer**). An appropriate WB Case Officer may include (but is not limited to) one or a combination of the following:

- ◇ For regulatory / compliance issues – a senior member of the Risk and Compliance team
- ◇ For human resources / employment related issues – a senior member of the People & Culture (P&C) team
- ◇ For all matters – external investigation specialists

Depending on the nature of the disclosure and reported wrongdoing, the WB Case Officer will consider deploying one of the following methods of investigation:

- a) Targeted investigation based on disclosure details;
- b) Limited investigation as a result of limited disclosures; or

- c) Broad review on subject matter or work area referred to in a disclosure.

Any persons who are contacted to assist with an investigation are required to maintain appropriate confidentiality by not sharing any information regarding the case, except where reporting information to the WB Case Officer (or any other person expressly authorised by the WB Case Officer or the WB Protection Officer). It is also expected that any persons who are contacted to assist with the investigation (including the original discloser) will provide sufficient information to enable the WB Case Officer to investigate the case.

As part of the investigation process the firm will not disclose information which is likely to lead to the identification of a whistleblower's identity except in the following circumstances:

- a) The discloser has provided consent;
- b) The information does not include the discloser's identity;
- c) The firm has removed information relating to the discloser's identity or other information likely to lead to the identification of the discloser; or
- d) It is reasonably necessary for investigating the issues raised in the disclosure.

While there is no time limit stipulated for the completion of an investigation, Evans Dixon expects the investigation to be accurate, thorough, efficient, and not unnecessarily delayed or under resourced in order to appropriately confirm or rule out whether any misconduct or improper state of affairs has occurred, as soon as is practicably possible. It is also important to note that certain circumstances may prevent Evans Dixon from being able to undertake or complete, or rigorously investigate a disclosure (e.g. anonymous reports which do not provide certain information or methods of contact to obtain additional information).

Throughout the investigation, the discloser will be provided with regular updates (preferably by WB Protection Officer) relating to the investigation as long as appropriate communication channels have been established – note, this may not be possible with persons who report anonymously and do not supply preferred communication channels or utilise the KPMG FairCall service. Typically, a discloser may be updated during key stages of the investigation, including when the investigation process has begun, while the investigation process is in progress, and after the investigation has been finalised.

## 5.4 Investigation findings

The WB Case Officer will report the findings of the initial investigation directly to the WB Protection Officer. The WB Protection Officer will review and determine the legitimacy of the initial report, and may instruct the WB Case Officer to investigate further into specific circumstances of the case. The WB Case Officer will produce a final report to the WB Protection Officer in a form and manner that the WB Protection Officer decides is appropriate. This final report must be safeguarded and filed in a secure folder that is only accessible by the WB Protection Officer and/or WB Case Officer. Separately, the WB Protection Officer may elect to write up a separate final report which takes into account the investigation details and any other considerations necessary to finalise the investigation report (e.g. redaction of certain details to protect confidentiality where applicable).

The WB Protection Officer will make a determination from the final report on how to respond to the whistleblowing disclosure. Where permissible, this may include liaising with the board, relevant members of the senior executive team, legal adviser and/or the compliance committees, who will consider and decide on appropriate measures to rectify any wrongdoing discovered by the investigation.

The WB Protection Officer is responsible for ensuring the findings of the investigation have been appropriately documented and reported to relevant officers and management of the firm. The

format of the documented findings and reporting to relevant officers and management may vary between cases depending on the nature of the disclosure. Where requested, the confidentiality of the discloser's identity will be maintained. The WB Protection Officer will also confirm what (if any) information the discloser will receive at the end of the information (noting that there may be circumstances where it may not be appropriate to provide the outcomes details to the discloser).

## 5.5 Fair treatment of individuals mentioned in a disclosure

The firm engages in practices to ensure that any employee mentioned in a disclosure receives fair treatment. The following measures and mechanisms may be utilised by the firm to ensure fair treatment:

- ◇ Handling practices which maintain confidentiality of a disclosure
- ◇ Initial assessment of a disclosure to confirm whether an investigation should take place
- ◇ Performing an investigation which has the objective of determining whether there is enough evidence to substantiate or refute the matters reported
- ◇ Conducting of an investigation in a manner which is objective, fair and independent
- ◇ Access to support services by and employee who is the subject of the disclosure

The firm is unlikely to inform an individual that they are the subject or a disclosure in the early stages of an investigation in order to assist with the effectiveness of that investigation, however the individual will be informed before any adverse finding is made against them.

## 5.6 Whistleblowing Policy Management

This Policy forms part of the firm's Risk Management Framework, and is available on the firm's internal company intranet systems. It is also available upon request from KPMG via the FairCall reporting channel (which is linked within the disclaimers section of various group entity websites).

This Policy is to be reviewed regularly to ensure it is current, efficient and effective by the Risk and Compliance team. The review will also focus on whether all whistleblower disclosures that have been reported have been dealt with in accordance with this Policy.

## 5.7 Whistleblowing Policy Breaches

There is a zero tolerance for any breach of this Policy. Specifically:

- ◇ All staff are expected to not engage in any activity which breaches the firm's Harassment and Bullying and policy, including causing detriment to any whistleblower;
- ◇ Eligible recipients are expected to maintain strict confidentiality with regards to any whistleblower reports received;
- ◇ Persons should not engage in deliberate false reporting; and
- ◇ Any material breaches of this Policy will be reported to the Board.

## 5.8 Training

All employees at Evans Dixon are provided with a copy of this Policy upon commencement of their employment. Employees may also be requested to complete a periodic policy acknowledgement confirming that they have read and understood this Policy.



Training may also be provided to employees on a periodic or ad-hoc basis relating directly to this Policy, or other key policies and practices which outline the obligations of the firm’s employees which may assist with the identification of wrongdoing.

Eligible recipients will be provided with training and ongoing reminders regarding their obligations as potential recipients of whistleblowing reports.

### 5.9 Roles and Responsibilities

<b>Role</b>	<b>Responsibility</b>
Whistleblower Protection Officer	Ultimate escalation point for whistleblower reports and responsible for ensuring protections are applied to whistleblowers
Eligible Recipients	Authorised escalation point / recipient for whistleblower reports
Risk and Compliance	Whistleblowing framework design, testing, reporting and enhancement
Board	Oversight and adoption of Whistleblowing framework