Whistleblower Protection Policy

Overview and Purpose

The purpose of the Whistleblower Protection Policy is to detail the procedures which we follow to meet the requirements under the section 1317AI of the Corporations Act and RG 270 Whistleblower policies (**RG 270**).

We are committed to upholding the highest standards of integrity, fairness and ethical conduct and recognises that a whistleblower protection program is an important element in detecting corrupt, illegal, or other undesirable conduct.

This Policy has been developed to ensure employees can raise concerns regarding any misconduct or improper state of affair or circumstances without being subject to victimisation, harassment, or discriminatory treatment.

The Board and senior management of the Licensee encourage reporting potential misconduct. A failure to report potential misconduct exposes the Licensee to risks and undermines the Licensee's values.

The objective of this Policy is to:

- encourage our employees to disclose relevant information if they become aware of potential misconduct;
- detail the procedure in reporting concerns and the protections available to disclosers;
- outline our processes for responding to disclosures; and
- ensure disclosers feel safe in disclosing their concerns.

Overview of the Corporation Act and Regulatory Guide 270 requirements:

- We maintain a Whistleblower Policy that is:
 - aligned to the nature, size, scale and complexity of the business
 - is supported by processes and procedures for effectively dealing with disclosures received under the policy; and
 - uses a positive tone and language that encourages the disclosure of wrongdoing.
- The Licensee will take steps to give effect to this Policy by ensuring that it is implemented appropriately and consistently carried out in practice.
- The Licensee will have arrangements in place for periodically reviewing and updating this Policy to ensure issues are identified and rectified.



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Structure, Operations and Supply Chains

The Licensee is committed to a supportive environment and encourages employees to raise concerns that they may have regarding conduct occurring throughout our operations.

The Licensee has _{several} formal and informal ways in which concerns can be raised depending on the circumstances and the level of seriousness of the issue. This is set out in detail in the Policy.

Disclosure made under this Policy will be received and treated sensitively and seriously and will be dealt with fairly and objectively. The Licensee's response to a disclosure will vary depending on the nature of the disclosure (including the amount of information provided).

Recipients will keep in contact with disclosers until the matter is resolved by us. If appropriate, disclosers will be told how we have decided to respond to their disclosure, including whether an investigation will be conducted.

Board Monitoring and Approval

We will ensure that the requirements detailed above in RG270 are fulfilled. Additionally, we will provide to the Board an assessment on the implementation of the obligations of this Policy at least every two (2) years. The Board will consider the effectiveness of the measures described above and amend the policy as it sees fit.