

# WHISTLEBLOWER POLICY

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## 1. About the document

At PetSure, we want to be a place of choice for pet lovers, which includes embracing our core values in everything we do. This Whistleblower Policy (**Policy**) supports this by reinforcing our commitment to high standards of conduct and ethical behaviour in our business activities and enabling confidential reporting so that we may maintain these standards.

This Policy applies to the Boards of PetSure Holdings Pty Ltd (**PetSure Holdings**), PetSure (Australia) Pty Ltd (**PetSure**) and their subsidiaries (**Subsidiaries**) (collectively "**the Group**" and/or "**the Boards**" as the context requires).

## 2. Who is covered by this Policy?

This Policy applies to disclosures made by:

- directors or officers of the Group
- employees (**PetSure people**), former employees and contractors of the Group
- an individual who supplies services or goods to the Group (whether paid or unpaid), or an employee of that individual
- a relative, spouse or dependent of any of the persons listed above

These individuals are considered to be Eligible Whistleblowers and are eligible to make disclosures qualifying for Whistleblower protections under the Corporations Act 2001 (Cth).

## 3. Roles and responsibilities

Role	Responsibilities
Whistleblower Disclosure Officer	<ul style="list-style-type: none"> <li>• nominated as the Chief Legal Officer</li> <li>• receive disclosures and ensure timely investigation</li> <li>• contact point for both external organisation (STOPline) and the CEO and Executive Leadership Team (<b>ELT</b>)</li> </ul>
Whistleblower Support Officer	<ul style="list-style-type: none"> <li>• person/s appointed to take all reasonable steps to support the Whistleblower through the process of reporting an allegation of wrongdoing and during any subsequent investigation. This support may include: <ul style="list-style-type: none"> <li>• keeping in regular contact with the Whistleblower</li> <li>• considering any complaint of retaliation made by the Whistleblower as a result of notifying the Reportable Conduct</li> <li>• responding to any other concerns raised by the Whistleblower in connection with their notification and reporting.</li> </ul> </li> </ul>
Whistleblower Investigation Officer	<ul style="list-style-type: none"> <li>• person appointed by the Whistleblower Disclosure Officer to conduct an investigation of the disclosure of Reportable Conduct and will be one of ELT who has been trained to conduct investigations. This may also include the use of internal or external investigative resources, however in all cases must be operationally independent of the area under investigation.</li> <li>• report the outcomes of an investigation to the Whistleblower Disclosure Officer, who will report this to the CEO, or Country President and the Chief Risk Officer.</li> </ul>

## 4. Purpose of the Policy

The Group is committed to high standards of conduct and ethical behaviour in its business activities, and to promoting and supporting a culture of honest and ethical behaviour.

The purpose of this Policy is to set out clear roles, responsibilities, and reporting lines to encourage the confidential reporting of any instances of suspected unethical, illegal, fraudulent or an improper state of affairs involving PetSure or its supply chains to ensure that anyone who makes a report can do so without fear of intimidation, disadvantage or reprisal.

Governance of the Policy is overseen by the Board Audit Committee (**Committee**). This responsibility includes ensuring that the Policy is legally compliant, operating effectively and reviewed annually. Additionally, the Committee will consider whether those matters reported to it under the Policy have been dealt with appropriately by the ELT and that trends, themes or emerging risks highlighted by disclosures are addressed and mitigated.

The focus of the Committee's oversight is to ensure that anyone who reports any instances of suspected unethical, illegal or fraudulent conduct, or an improper state of affairs, involving PetSure or any of its subsidiaries has confidence that they can make a report without fear of intimidation, disadvantage, reprisal or other detriment.

For parts of the Group that are impacted by foreign laws or local laws that conflict with the Policy, the more stringent standard applies.

## 5. What is Reportable Conduct?

A person may make a report, with the benefit of the protections set out in this Policy and under the *Corporations Act 2001* (Cth) where objectively, there are reasonable grounds to suspect that the Group, an employee, contractor or a person who has business dealings with the Group has engaged in conduct ("**Reportable Conduct**") which:

- is dishonest, improper, fraudulent or corrupt
- is unethical or in breach of a Group policy or breach of legislation
- is illegal (such as theft, dealing in or use of illicit drugs, violence, bullying, victimisation, harassment, intimidation, criminal damage, breach of competition, consumer, privacy or other law)
- is potentially damaging to the Group, its business interests, its financial or tax affairs or its employees (such as unsafe work practices, environmental damage, or abuse of Group resources)
- a failure to comply with, or a breach of, legal or regulatory requirements, including but not limited to the *Corporations Act 2001* (Cth), the *Australian Securities and Investments Commission Act 2001* (Cth), the *Financial Sector (Collection of Data) Act 2001* (Cth), the *Insurance Act 1973* (Cth), or an instrument made under one of the aforementioned Acts involves modern slavery
- involves any other kind of misconduct, or an improper state of affairs or circumstances
- amounts to abuse of authority, conflict of interest
- in the case of PetSure Holdings and PetSure, indicates that a responsible person does not meet the fit and proper criteria set out in the Fit and Proper Policy.

The Group expects that reports made under this Policy are made honestly, ethically and on reasonable grounds. Persons making reports under this Policy can still qualify for protection under this Policy even if their disclosure turns out to be incorrect.

If it is shown that a false report without reasonable grounds has been made then that conduct itself will be considered a serious matter and may be subject to legal or disciplinary action.

## 6. What is not Reportable Conduct?

This Policy is not intended to apply to disclosures relating to conduct concerning a person’s employment or former employment, other than set out in section 5 as Reportable Conduct. The protections in this Policy do not apply to disclosures unrelated to Reportable Conduct.

## 7. Who can I make a report to?

We encourage honest, transparent communication so anyone can speak up if they are concerned about a matter at work, even if unsure whether the matter would be considered Reportable Conduct. When making a report, a Whistleblower may identify themselves or utilise an anonymised email address or pseudonym.

A person can report concerns about misconduct or wrongdoing, and it is encouraged to do this in a way that you feel most comfortable. Refer to the Policy available on the intranet.

Some of the options available to PetSure people include:

- speaking to a People Leader or another trusted Leader
- speaking directly to one of PetSure’s Whistleblower Disclosure Officers, or
- raising your concern via our independent PetSure Whistleblower service – STOPline (refer to next section for details).

### 7.1 Reporting to an external independent organisation

Contractors, service providers and other stakeholders can raise concerns using the following external, independent organisation:

To	Details
<b>STOPline</b>  (Independent third party available in Australia, South Africa and the Philippines)	STOPline is a free reporting service that is independently monitored and offers a translation service wherever needed: <ul style="list-style-type: none"> <li>• by phone from Australia to 1300 30 45 50</li> <li>• by phone from outside Australia reversing charges to +61 3 9811 3275</li> <li>• by email to <a href="mailto:petsure@STOPline.com.au">petsure@STOPline.com.au</a></li> <li>• by downloading STOPline from the iTunes App Store or Google Play</li> <li>• by post to STOPline, PO Box 403, Diamond Creek VIC 3089, Australia</li> </ul> Reports may be made anonymously and when contact details are provided, they may only be passed on to the Group with consent.
Australian Securities and Investments Commission ( <b>ASIC</b> )	<ul style="list-style-type: none"> <li>• <a href="#">online misconduct reporting form</a></li> <li>• or to: ASIC, GPO Box 9827, Brisbane QLD 4001</li> </ul>

To	Details
Australian Prudential Regulation Authority (APRA)	<ul style="list-style-type: none"> <li>by email to <a href="mailto:pid@apra.gov.au">pid@apra.gov.au</a></li> <li>or to CRO APRA, GPO Box 9836, Sydney NSW 2001</li> </ul>

## 7.2 Disclosure to a journalist or parliamentarian

Whistleblowers who disclose information to a journalist or a parliamentarian, only in certain limited circumstances related to public interest or emergencies, are protected by law, as explained in detail on the ASIC [website](#). The following circumstances apply:

- at least 90 days have passed since a disclosure was made to ASIC or APRA
- a person does not have reasonable grounds to believe that action is being, or has been taken, in relation to the disclosure
- a person has reasonable grounds to believe that making a further disclosure of the information is in the public interest
- before making the disclosure, a person has given written notice to ASIC or APRA (as appropriate) that identifies the disclosure and states that the employee intends to make a public interest or emergency disclosure.
- a person has reasonable grounds to believe that information subject to the disclosure concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment
- 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.

## 7.3 Disclosure to a legal representative

Whistleblowers who disclose information to a legal practitioner for the purpose of seeking legal advice or representation are protected by law, even if the legal practitioner concludes that a disclosure is not related to Reportable Conduct.

# 8. Investigation of Reportable Conduct

The Group will investigate Reportable Conduct reported under this Policy as soon as practicable after the matter has been reported. If the Whistleblower Disclosure Officer considers they may have an actual or potential conflict in relation to a disclosed matter, or the reported matter concerns a Whistleblower Disclosure Officer, the matter will be immediately escalated to the CEO who will assume the role of Whistleblower Disclosure Officer for the purposes of this Policy.

## 8.1 Assessment

Any report made to STOPline or to a Whistleblower Disclosure Officer, will be detailed in a Disclosure Report and the CEO will be notified that the report has been received. The Whistleblower Disclosure Officer will either:

- decide that there is not a serious concern that qualifies for protection, and take the appropriate action which may include an internal investigation, or
- organise for a full investigation by a Whistleblower Investigation Officer.

## 8.2 Investigation

An investigation will be conducted in an objective and fair manner, or as is reasonable and appropriate having regard to the nature of the Reportable Conduct and the circumstances. STOPline or a Whistleblower Disclosure Officer may, with consent, appoint a person to assist in the investigation of a report. Where a report is submitted anonymously, the Group may investigate based on the information provided. There may be however circumstances where the Group may not be able to undertake the investigation if it is not able to contact the discloser.

The Whistleblower Disclosure Officer will plan the nature, scope and timeframe for the investigation, which will vary depending on the nature of the disclosure. If not already appointed due to actual or potential conflict, a Whistleblower Investigations Officer with appropriate expertise and skills and operationally independent from the area under investigation will be appointed. This may be an independent third party.

The Whistleblower Disclosure Officer will provide information to the Whistleblower Investigations Officer where that is reasonably necessary for investigating the issues raised in the disclosure. That will only include the Whistleblower's identity where they have provided their consent for that to be given.

## 8.3 Communication

STOPline or the Whistleblower Disclosure Officer will communicate with the Whistleblower. The content, frequency and timeframe of updates will depend on the nature of the disclosure.

The discloser is entitled to remain anonymous or use a pseudonym during the course of the investigation and after the investigation is finalised. The discloser is entitled to refuse to answer any questions put to them (including questions which could reveal their identity at any time) though this may impact the effectiveness of the investigation.

The ultimate decision will be communicated to the Whistleblower and also to the CEO and Chief Legal Officer (without providing identifying details of the Whistleblower).

Where the person who made the report is not satisfied with the conduct or the outcome of the investigation, they can request that the matter is escalated to the CEO.

# 9. Protection of Whistleblowers

The Group is committed to ensuring confidentiality in respect of all matters raised under this Policy, and those who make a report are treated fairly and do not suffer detriment. When a person communicates Reportable Conduct to STOPline or a Whistleblower Disclosure Officer, that person qualifies for protection as a Whistleblower under the Corporations Act 2001 (Cth) from the time they make their disclosure.

An Employee is protected from civil liability (such as legal action for breach of an employment contract, duty of confidentiality or another contractual obligation) and criminal liability (such as attempted prosecution for unlawfully releasing information, or other use of the disclosure in a prosecution (other than for making a false disclosure) in relation to the making of the disclosure in accordance with Australian laws.

## 9.1 Confidentiality

Subject to compliance with legal requirements, upon receiving a report under this policy, the Group will take reasonable steps to keep the Whistleblower's identity confidential and

reduce the risk of disclosure in the course of an investigation. The Group will share the identity of a Whistleblower or information likely to reveal their identity if:

- there is consent to do so
- the concern is reported to ASIC or APRA, the Tax Commissioner or the Australian Federal Police, or
- the concern is raised with a lawyer for the purpose of obtaining legal advice or representation.

If the Group needs to investigate a report, it may need to disclose information that could lead to identification, however all reasonable steps will be taken to reduce that risk. Any disclosures of identity or information likely to reveal identity will only be made to an employee, advisor or contractor of the Group who reasonably has a need to investigate, report on, or respond to, the matters raised in the disclosure. Examples of how the Group will keep identification confidential through redaction of working documents, gender-neutral context in documentation, disclosures will be handled and investigated by the appropriate person.

All files and records created from an investigation will be retained securely. Unauthorised release of information to someone not involved in the investigation (other than senior employees or directors who need to know to take appropriate action, or for governance purposes) without Whistleblower consent is a breach of this Policy.

If a person believes there has been a breach of their confidentiality, as set out in this section, they may lodge a complaint with the Disclosure Officer or, if they may be involved in the breach, to the CEO. In that case, a person would also be free to seek independent legal advice or lodge a complaint with ASIC, APRA or the ATO as appropriate.

Whistleblowers are assured that release of information in breach of this Policy is regarded as a serious matter and will be dealt with under the Group's disciplinary procedures, even where no Reportable Conduct is found to have occurred.

## **9.2 Detrimental conduct**

Detrimental conduct includes dismissal, demotion, harassment, discrimination, disciplinary action, bias, threats or other unfavourable treatment connected with making a report.

Where a Whistleblower reasonably believes there has been detrimental treatment as a result of making a report under this policy they should immediately inform a Whistleblower Disclosure Officer or the CEO.

When any detriment is occasioned on an individual by an employee in reprisal for a report being made under this Policy, that will be treated as serious misconduct and will result in disciplinary action, which may include dismissal.

For the sake of certainty, the following is not detrimental conduct:

- administrative action taken to protect individuals who disclose Reportable Conduct, provided it is reasonable
- managing a discloser's unsatisfactory work performance in line with relevant PetSure policies.

This Policy also does not grant immunity for any misconduct an individual who discloses Reportable Conduct has engaged in themselves.



### **9.3 Protection of and support for Whistleblowers**

The Group will endeavour to protect individuals who disclose Reportable Conduct under this Policy and provide support to them, including in the following ways:

- the Whistleblower Disclosure Officer will consider the risk of detriment against the individual as soon as possible after receiving a disclosure and take any steps considered necessary to reduce that risk
- individuals may contact the Whistleblower Support Officer directly to discuss concerns they have in relation to the disclosure, and steps that may be taken to reduce those concerns
- the Group will consider making case-by-case changes to an individual's working arrangements as required
- any other support requested by the individual which, in the Group's opinion, is reasonable
- additionally, the Group will continue to support Whistleblowers by providing ongoing training to all employees who receive or investigate reports under this Policy, including training relating to confidentiality and prohibitions against detrimental conduct

### **9.4 Support for individuals mentioned in a disclosure**

The Group will treat any Employees mentioned in a disclosure made under this Policy fairly, including by:

- maintaining the confidentiality of those mentions where practical and appropriate in the circumstances
- advising the individual as and when required and prior to any actions being taken
- providing an opportunity to respond to any allegations (as appropriate)
- advising the individual of the outcome of any investigation.