

COMP-POL-WHI-01.3

Whistleblower Policy

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Version History

Version	Date	Author	Rationale
1.0	16/12/2019	Jayne Kerford	New policy
1.1	4/8/2020	Jayne Kerford	Minor change – update of postal address of Stopleveline
1.2	26/04/2021	Jayne Kerford	Minor change – addition of reference to Taxation Administration Act
1.3	23/11/2021	Jayne Kerford	Minor changes based on industry whistleblower policy feedback from ASIC.



1 Overview

RedZed Lending Solutions Pty Ltd and its related bodies corporate (“RedZed”) is committed to creating and maintaining a respectful and safe work environment in which all employees and others can raise concerns regarding actual or suspected unethical, unlawful or undesirable behaviour without fear of retaliation or victimisation.

1.1 Purpose

The purpose of this policy for RedZed is to:

- Encourage the reporting and disclosure of issues or behaviour where the discloser has reasonable grounds to suspect the information concerns misconduct or an improper state of affairs or circumstances in relation to RedZed (e.g. corrupt, illegal or other unethical conduct); and
- Provide details: -
 - about the protections available to whistleblowers;
 - about to whom disclosures that qualify for protection under the Corporations Act 2001 (Cth) may be made and how they may be made;
 - about how RedZed will support whistleblowers and protect them from detriment;
 - as to how RedZed will investigate disclosures and ensure fair treatment for RedZed employees mentioned in disclosures; and
 - as to how this policy is made available.

2 Policy

2.1 Eligible Whistleblower

An eligible whistleblower is:

- An employee, director, business partner, service provider, contractor and consultant and includes persons who had a past relationship with RedZed;
- A supplier of goods or services to RedZed and the employees of a supplier; or
- A spouse, dependent and other relative of those listed above.

A discloser qualifies for protection as a whistleblower under the Corporations Act if they are an eligible whistleblower (as detailed above) and:

- they have made a disclosure of information relating to a disclosable matter (see below) directly to an eligible recipient (see below) or to a regulatory body;
- they have made a disclosure to a lawyer for the purpose of obtaining legal advice or legal representation in relation to a whistleblower matter; or
- they have made an emergency disclosure or public interest disclosure (see below).

The Taxation Administration Act 1953 (Cth) may also provide protection for whistleblowers disclosing matters related to the tax affairs of RedZed. The protections are similar to those provided to a whistleblower under the Corporations Act in that these apply where: -

- there is an eligible whistleblower;



- the disclosure is made to an eligible recipient;
- the discloser has reasonable grounds to suspect that the information indicates misconduct, or an improper state of affairs or circumstances in relation to the tax affairs of RedZed; and
- the whistleblower considers the information may assist the eligible recipient to perform their functions relating taxation matters.

In this policy the details are with respect to the Corporations Act regime unless stated otherwise.

This policy is available via RedZed external website www.redzed.com/faqs/ and internally on ZedShare Whistleblower Policy.

2.2 Disclosable Matters

Disclosable matters refers to disclosure of information where the discloser has reasonable grounds to suspect that the information concerns misconduct or an improper state of affairs or circumstances in relation to RedZed.

Examples of disclosable matters which qualify for protection under the Corporations Act are:

- Dishonesty or corruption
- Theft, fraud or other illegal behaviour, this includes misuse of funds, resources or assets
- Behaviour that is detrimental to the financial performance or reputation of RedZed
- Deliberate manipulation of misreporting of transactions or performance measures
- A serious breach of RedZed policies or procedures
- Offering or accepting a bribe
- Behaviour that increases risk to the health or safety of employees or contractors
- Coercion, harassment or discrimination
- A danger to the public or financial system

A matter may qualify for protection where it does not involve a contravention of the law.

A discloser can qualify for protection under the Corporations Act even if the disclosure turns out to be incorrect.

2.3 Matters not covered by Whistleblower policy

Disclosures that are not about disclosable matters do not qualify for protection under the Corporations Act but may have some protection under other legislation (e.g. Fair Work Act 2009 (Cth)).

Issues that relate to personal work-related grievances are not considered eligible disclosures and do not qualify for protection under the Corporations Act. Examples of personal work-related grievances are personal conflicts between employees, employment decisions that do not breach workplace laws such as remuneration disagreements, employee contract terms and conditions, disciplinary actions.

Personal work-related grievances should be raised with your manager or the Head of Human Resources. In certain circumstances, a disclosure may still qualify for protection for a work-related grievance if: -



- The matter includes information about misconduct;
- RedZed has breached employment or other laws punishable by imprisonment for a period of 12 months or more or engaged in conduct that represents a danger to the public or misconduct;
- The discloser suffers or is at threat of suffering detriment for making a disclosure; or
- The discloser seeks legal advice about whistleblower protection.

2.4 Eligible recipient

RedZed has nominated John Harrison as its internal **eligible recipient** - Whistleblower Officer. Disclosers are encouraged to discuss verbally or in writing any whistleblower matters directly with the Whistleblower Officer in the first instance.

Disclosures can also be made to: -

- officers and senior managers of RedZed;
- A legal practitioner for the purpose of obtaining legal advice or representation about the whistleblower provisions of the Corporations Act;
- regulatory bodies; or
- the auditors of RedZed.

If you feel you are unable to raise or report an issue through to the eligible recipients identified above, or if you believe that an issue you have previously reported has not been adequately investigated, you can also contact RedZed's external independent whistleblower service, Stopleveline, anonymously if you prefer.

Should you wish to make a report using RedZed's external independent whistleblower service, Stopleveline, the alternate contact details are: -

- **Telephone:** 1300 30 45 50 (in Australia)
- **Facsimile:** RedZed, C/o Stopleveline +61 3 9882 4480
- **Email:** redzed@stopleveline.com.au
- **Online:** <https://redzed.stoplevelinereport.com>
- **APP:** Smart phone APP (free download from the Apple iTunes store and Google Play)
- **Mail:** RedZed, c/o Stopleveline, P.O. Box 403, Diamond Creek, Victoria. 3089

Calls will be received by Stopleveline 24 hours a day and 7 days a week. Calls are not recorded. The operators on this hotline are not RedZed employees. They are specialists trained in dealing with whistleblowers and their concerns. Whistleblowers will be provided with a confidential reference number by Stopleveline

A discloser may seek additional information or clarification of the whistleblower policy prior to making a disclosure by contacting RedZed's Whistleblower Officer, the external Whistleblower service or by seeking independent legal advice.

2.5 'Emergency disclosure' or 'public interest disclosure'



In certain circumstances, where a whistleblower believes that a previously disclosed matter has not been sufficiently investigated or reasonable action has not been taken, a whistleblower can make a disclosure to a journalist or member of parliament.

However, a whistleblower should seek independent legal advice to seek clarification on their protection under the Corporations Act when considering making an **emergency disclosure** or **public interest disclosure**.

There is no provision with respect to such disclosures under the Taxation Administration Act.

2.6 Handling and investigating a whistleblower matter

Employees or others making a whistleblower report can do so anonymously and still be protected under the Corporations Act. However, we prefer that you provide your name and contact details to allow for any additional follow up questions that may assist investigations of the concerns raised. Should a whistleblower prefer to remain anonymous, they can continue to maintain communication with the person to who they made the report, to allow for follow up questions and to provide updates and feedback.

RedZed's eligible recipients are responsible to investigate the substance of the report received in a reasonable timeframe (normally 20 business days though this will depend on the circumstances) and determine whether there is evidence to support matter raised based on the information provided.

Should the eligible recipient deem that further specialist investigative skills are required, they may request the additional investigative support.

For any externally reported matters, Stopline will prepare an initial report that details the concerns as reported by the whistleblower and will provide a report of the disclosure to RedZed's Whistleblower Officer. For the protection of the discloser, all reports protected under the Corporations Act will have any information which can be used to identify the whistleblower removed or de-identified.

Where possible, and assuming the identity of the whistleblower is known, the whistleblower will be kept informed of the progress and the outcome of their report, subject to privacy and confidentiality considerations. Whistleblowers can contact the Whistleblower Officer or Stopline (if appropriate) for updates on the status of their report.

Should the whistleblower not be satisfied with the conduct (e.g. breach of confidentiality) or the outcome of the investigation, they may lodge a complaint with the relevant regulatory body or consult a legal practitioner for further legal advice.

At the completion of an investigation the eligible recipient will complete a report and consider implementation of any findings and recommendations. If the matter relates to a regulatory breach, the report will be dealt with in accordance with RedZed's Compliance Framework.



2.7 Protections and Safeguards

RedZed is committed to ensuring the protection of whistleblowers. It is an offence under the Corporations Act for RedZed to breach the confidentiality of a whistleblower or cause detriment to a whistleblower.

All information received from a whistleblower will be treated confidentially and sensitively. RedZed will use the following types of methods to protect the confidentiality (and, if relevant, the anonymity) of a discloser: -

- disclosure will be handled and investigated by eligible recipients (or external investigators as deemed necessary);
- disclosers will be referred to in a gender-neutral context; and
- materials relating to the discloser and any subsequent investigations or reports will be stored securely.

When a disclosure is made, the identity of the whistleblower (or any information that would likely identify the discloser the whistleblower's identity) will only be shared if: -

- The whistleblower provides consent to share that information; or
- The disclosure is allowed or required by law (for example, disclosure to a lawyer in seeking legal advice relating to whistleblowing law or disclosure to a regulator).

RedZed will not tolerate any detrimental conduct of an individual who intends to report, has made a whistleblower report or is involved in a whistleblower investigation. Examples of detrimental conduct includes: -

- Dismissal
- Demotion
- Any form of harassment
- Any Physical or psychological harm
- Discrimination
- Any form of bias

Should a whistleblower believe they have been the subject of any detrimental conduct due to their disclosure they are encouraged to refer this to the eligible recipient for investigation. A discloser can seek compensation or other remedies if they suffer a loss, damage or injury because of a disclosure or if RedZed is found to have failed to prevent a person from causing the detriment.

A discloser is protected from civil, criminal and administrative liability in relation to an eligible disclosure.

Employees are reminded that they can access the support services of RedZed's Employee Assistance Program - Acacia Connection via phone: 1300 364 273.

Should an employee or become aware of any information provided by a whistleblower, it is illegal for them to release the information to a person who is not involved in the investigation or resolution of the matter. Similarly, the whistleblower's identity or any information that may lead to the identification of the whistleblower must not be released.

These protections apply to both internal and external eligible disclosures.



To reinforce the importance of protection of whistleblowers from detriment, RedZed will provide periodic training to its whistleblower officer and senior managers.

2.8 False Reporting

When making a report, you will be expected to have reasonable grounds to suspect the information you are disclosing is true. You will not be penalised if the information turns out to be incorrect. However, you must not make a report you know is not true or is misleading.

2.9 Ensuring fair treatment of individuals mentioned in a disclosure

RedZed ensure the fair treatment of employees who are mentioned in a disclosure by:

- ensuring that any investigation undertaken is completed fairly and objectively;
- ensuring the investigation is independent of the discloser, the individual(s) who are the subject of the disclosure, and the department involved; and
- providing support services via RedZed's Employee Assistance Program - Acacia Connection via phone: 1300 364 273.

3. Reporting

All whistleblower reports, investigation updates and investigation findings are reported to the Risk and Compliance Committee and the Board.

Regular (minimum quarterly) reporting of internal HR complaints are also to be provided to the Board as a potential lead indicator of cultural issues.

4. Governance

This policy was approved by the Risk & Compliance Committee on 26/04/2021. This policy must be reviewed and approved by the Board (or delegated Risk Committee) every two years.

This policy is owned by the Board.

5. Related Policies

This policy should be read in conjunction with the following policies:

- Compliance Policy
- Internal Dispute Resolution Policy