

Whistleblower Protection Policy

Why we have this policy

It's important that our people feel supported and encouraged to speak up against actual or suspected improper conduct – no matter what the situation is. This policy helps us do this, outlining what it means to make a whistleblower report and an overview of the process involved.

The Whistleblower Protection Policy helps us to:

- manage and reduce the risk of improper conduct within or by Australian Unity
- support all our current and former employees to freely raise concerns about actual or suspected Reportable Conduct – without fear of repercussions, and
- reinforce and protect our values and the principles of our Code of Conduct.

This policy should be read in conjunction with the Whistleblower Protection Procedure.

Policy Detail

Who does the policy apply to?

This policy applies to all 'Eligible Whistleblowers', defined as:

- a current or former employee (full-time, part-time, permanent or casual) of Australian Unity, which includes directors, officers, employees, contractors or volunteers
- a supplier of services or goods to Australian Unity (paid or unpaid), or employed by someone who supplies services or goods to Australian Unity, and
- a relative or dependent of anyone who is employed by, or supplies services or goods to, Australian Unity.

What conduct is covered by the policy?

The conduct covered by this policy is called Reportable Conduct. In relation to Australian Unity, it's defined as conduct that an Eligible Whistleblower has reasonable grounds to suspect is:

- dishonest, fraudulent or corrupt behaviour (including bribery)
- illegal activity, including theft, drug sale or use, discrimination, violence, bullying, harassment or intimidation or criminal damage
- unethical or in breach of Australian Unity's policies (such as dishonestly altering company records or data, Modern Slavery concerns within our supply chain, insider trading, insolvent trading, not managing conflicts of interest appropriately, adopting questionable accounting practices or willfully breaching our Code of Conduct or other policies or procedures)
- an activity which represents a danger to the public or the financial system
- potentially damaging to Australian Unity, an Australian Unity employee or a third party, such as unsafe work practices, environmental damage, health risks or abuse of Australian Unity property or resources

- an abuse of authority
- misconduct or improper circumstances relating to the tax affairs of Australian Unity
- a contravention of relevant 'Financial Services Laws'
- any conduct that may have serious negative impact on Australian Unity's customers, members, employees, contractors, reputation, interests or financial position.

Reportable Conduct usually relates to the conduct of employees, but it can also relate to the actions of a third party, such as a customer, supplier or service provider of Australian Unity.

What conduct isn't covered by the policy?

If there are any other conduct-related matters not listed above, they aren't covered by this policy and don't qualify for whistleblower protection. This includes personal work-related grievances about your employment or former employment, which you should report to your Manager or People & Culture representative.

However, if you have any personal work-related grievances which relate to Reportable Conduct, or which may be considered Detrimental Conduct resulting from a Whistleblower Disclosure, these will be covered by this Policy.

How can you make a report?

The process we have in place to make a Whistleblower Disclosure of Reportable Conduct allows for easy and safe reporting. It also includes the option of using an external reporting service.

To qualify for the whistleblower protections under this policy and the Corporations Act (or the Tax Administration Act, as applicable), you must make a report about Reportable Conduct to an 'Eligible Recipient'. An Eligible Recipient includes the following:

External Alert Service

We've established an external, independent Alert Service managed by Linchpin Legal Management Pty Ltd. We encourage you to make Disclosures via the Alert Service, which can be done either by:

- email on audisclosure@llm.net.au, or
- calling the Disclosure Hotline on 1300 794 250

Whistleblower Protection Officers

We've also appointed internal Whistleblower Protection Officers (WPO). They have specific responsibilities around receiving Disclosures and protecting the people who make them. The WPOs include:

- the Chief of Audit, and
- the Group General Counsel.

Other Eligible Recipients

You can also make a Disclosure to these Other Eligible Recipients:

- a member of the Executive Committee
- Directors of Australian Unity Limited
- the Company Secretary, and
- the external auditors

If you're reporting to Other Eligible Recipients, you can make the Disclosure in person or by phone. Either way, you must make it known that you're making a report under this Whistleblower Policy.

If you make Disclosures to the above Eligible Recipients, you'll qualify for protection. However, we prefer that you make them directly to the Alert Service or to the Whistleblower Protection Officers — so we can take action quickly.

If Other Eligible Recipients consider it appropriate, they may advise you to make your report to the external Alert Service or the designated WPOs.

Once you make a Disclosure to an Eligible Recipient, they'll:

- contact you quickly, acknowledge receipt and check on your wellbeing (if you've provided your name and/or contact details)
- put the right measures in place to support and protect you
- carry out preliminary inquiries to determine whether an investigation is possible and appropriate, and if so
- arrange for an investigator with the right experience, background, capability and independence to investigate your report.

What protections apply?

We're committed to making sure Disclosures are managed in line with the policy and the Financial Services Laws, and that we provide all the required whistleblower protections. These protections include the following:

- You can choose to remain anonymous. However, we encourage you to disclose your identity so that we can better support you and ensure you get the right protections. It will also help us get further information about the report.
- If you choose anonymity, it's illegal for us to identify you — unless it's specifically required by law to do so externally.
- We'll protect your confidentiality by ensuring:
 - disclosures are handled and investigated by qualified staff
 - personal information is de-identified in reports relating to the Disclosure
 - all paper, electronic documents and other materials relating to the Disclosure are stored securely
 - only a restricted number of people who are directly involved in handling and investigating the report will be aware of your identity, provided you haven't requested anonymity, and
 - your identity is only disclosed to staff handling the investigation where we have your consent, or where we're legally required to do so.
- If you make a Disclosure, you won't be subject to any 'Detrimental Conduct' for doing so. You're also protected from any civil, criminal and administrative liability that may result from making it.
- If you're an employee or contractor who threatens or engages in Detrimental Conduct towards an Eligible Whistleblower, who has made or is about to make a Disclosure, you'll be investigated and possibly subject to disciplinary action.
- If you suffer loss, damage or injury because of a Disclosure and we've failed to take reasonable precautions, or exercise due diligence to prevent Detrimental Conduct, you're entitled to seek compensation and other remedies through the courts.

- If you're involved in the Reportable Conduct, making a Disclosure won't shield you from the consequences. However, your admission may be taken into account when considering disciplinary or other action.
- You should immediately notify one of the WPOs if you're concerned that you may be, are being, or have been subjected to Detrimental Conduct, or your Disclosure hasn't been dealt with in line with this policy.
- You can still qualify for these protections even if the Disclosure turns out to be incorrect.

You may also qualify for the whistleblower protections if you've:

- made a Disclosure directly to ASIC, APRA or another Commonwealth body prescribed by regulation¹
- 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
- made an emergency or public interest disclosure to a journalist or parliamentarian in line with the definition in the Corporations Act.

We understand that making a Disclosure, or being involved in one, can be a stressful and emotional experience to manage. You can find extra support services through the Employee Assistance Program, your People & Culture representative or your Manager.

How Disclosures will be investigated and reported?

We make the following commitments in how we investigate and handle Disclosures:

- All investigations will be conducted in a fair and independent manner.
- The investigation process and duration will vary depending on the nature of the Reportable Conduct and the amount of information provided. We'll aim to investigate and resolve the matter as soon as practically possible.
- If you wish to remain anonymous, your identity won't be disclosed to the investigator or to any other person throughout the investigation.
- To avoid jeopardising an investigation, you must keep your report confidential and not tell anyone you've made one. Exceptions may include if you wish to obtain independent legal advice, access the Employee Assistance Program or seek support from your People & Culture representative or Manager.
- If you've made a Disclosure and haven't chosen to remain anonymous, you'll be kept informed on how the investigation progresses. How often you get these updates may depend on the nature of the Disclosure.
- Where a person is found to have engaged in misconduct, the matter will be dealt with in line with Australian Unity's disciplinary procedures. This may result in disciplinary action, including dismissal. Serious criminal matters will be reported to the police or other appropriate regulatory authorities.
- The type and number of Disclosures will be reported to Australian Unity's Risk and Compliance Committee and Audit Committee. The name of the person making the disclosure won't be reported.
- The outcome of any investigations will be reported to the Audit Committee and may be referred to the Board or its other Committees.

¹ s.1317AA Corporations Act

Communication

This policy will be available on the Intranet and on the Australian Unity Website. We recommend reading it alongside the Whistleblower Protection Procedure, which contains more details about the way Disclosures will be managed.

This policy will be supported by regular training delivered to all employees as part of the Code of Conduct training, via the Learning Management System.

Policy breaches

If you fail to comply with this policy, it's a reportable incident under the Group Incident Management Policy and could result in consequences.

Failure to comply with this policy may also mean a failure to comply with the Australian Unity Code of Conduct.

Policy exemptions

To apply for an exemption to this policy, you'll need to submit a request to the Policy Administrator who will refer them to the Policy Owner.

Legal obligations

If you believe that you've got a legal obligation that's inconsistent with this policy, immediately report it to your Risk and Compliance Manager, and comply with the higher standard.

Where to get help

If you're a current employee and have any questions about the policy or whistleblower process, contact the General Manager, Group Risk and Compliance or one of the nominated WPOs.

If you're a former employee or external party, contact the external Alert Service.

Glossary

Word or term	Description
Board	means the Board of Australian Unity Limited.
Board Committees	means the committees of the Australian Unity Limited Board including the Audit Committee, the Risk and Compliance Committee, the Investment Committee, and the People, Culture and Remuneration Committee.
Detrimental Conduct	includes but is not limited to: <ul style="list-style-type: none"> • dismissal of the employee; • injury of an employee in his or her employment; • alteration of the employee's position or duties to his or her disadvantage; • discrimination between an employee and other employees; • harassment or intimidation; • harm or injury to a person including psychological harm; • damage to property; • damage to a person's reputation; • damage to a person's business or financial position; or • any other damage to a person.
Disclosure	means a report of Reportable Conduct by an Eligible Whistleblower to an Eligible Recipient.
Eligible Recipients	means: <ul style="list-style-type: none"> • a representative of an appointed external independent Alert Service. • the Chief of Audit; • the Group General Counsel; • a member of the Executive Committee; • the external auditors; • Australian Unity Directors; or • the Company Secretary.
Eligible Whistleblower	means an individual who is: <ul style="list-style-type: none"> • employed or has been employed by Australian Unity including directors, officers, employees (whether full-time, part-time, permanent or casual), contractors or volunteers; • a supplier of services or goods to Australian Unity (whether paid or unpaid) or are employed by someone who supplies services or good to Australian Unity including a contractor or volunteer; or • a relative or dependent of anyone who is employed by or supplies services or goods to Australian Unity.
Financial Services Laws	Includes: <ul style="list-style-type: none"> • the Corporations Act 2001;

	<ul style="list-style-type: none"> • the ASIC Act 2001; • the Banking Act 1959; • the Financial Sector (Collection of Data) Act 2001, • the Insurance Act 1973; • the Life Insurance Act 1995; • the National Consumer Credit Protection Act 2001; • the Superannuation Industry (Supervision) Act; or • An instrument made under any of the Acts referred to above
Modern Slavery	is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive their freedom. Examples include human trafficking, forced or bonded labour, slavery-like practices and child labour.
Reportable Conduct	is conduct connected with Australian Unity that an Eligible Whistleblower has reasonable grounds to suspect is: <ul style="list-style-type: none"> • dishonest, fraudulent or corrupt including bribery; • illegal activity; including theft, drug sale or use, violence, harassment or intimidation or criminal damage; • activity which represents a danger to the public or the financial system; • unethical or in breach of Australian Unity’s policies (such as dishonestly altering company records or data, modern slavery concerns within our supply chain, insider trading, insolvent trading, not managing conflicts of interest appropriately, adopting questionable accounting practices or willfully breaching our Code of Conduct or other policies or procedures); • potentially damaging to Australian Unity, an Australian Unity employee or a third party, such as unsafe work practices, environmental damage, health risks or abuse of Australian Unity property or resources; • involves harassment, discrimination, victimisation or bullying; • an abuse of authority; • a contravention of the relevant ‘Financial Services Law’; • a contravention of the Taxation Administration Act or reasonable suspicions of misconduct or improper circumstances relating to tax affairs of Australian Unity; and • any other conduct that may have serious negative impact on Australian Unity’s customers, members, employees, contractors, reputation, interests or financial position.
Whistleblower Disclosure ('Disclosure')	means a Disclosure of Reportable Conduct by an Eligible Whistleblower.
Whistleblower Protection Officers (WPO)	Means the appointed internal Whistleblower Protection Officers (WPO) who have specific responsibilities in relation to receiving Disclosures and protecting those who make them. The WPOs include: <ul style="list-style-type: none"> - the Chief of Audit, and - the Group General Counsel.