

Title: Whistleblower Protection Policy	Reviewed by: Michael Vogt EGM HR & Safety Approved by: Tracey Wright Chief Executive Officer	Issue Date: December 2019	Revision Date: December 2021
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1. INTRODUCTION

You may have concerns about conduct within the Club Assist Pty Ltd (ACN 054 184 842) (**Club Assist**) which appears to you to be illegal, unethical or otherwise improper, but you may feel apprehensive about raising your concerns because of the fear of possible adverse repercussions to you.

The aim of this Policy is to ensure that:

- you are aware of your rights, protections and obligations under Part 9.4AAA of the *Corporations Act 2001* (Cth) (the **Act**) in relation to the making and investigation of a whistleblowing disclosure;
- Club Assist is compliant with its obligations under the Act in relation to whistleblowing disclosures; and
- you feel confident about raising such concerns, by offering a reporting and investigative mechanism that is objective, confidential, independent, and knowing that you are protected from reprisal or disadvantage, in accordance with the Act.

Under this Policy:

- you are encouraged to report your concerns, whether openly or, if preferred, anonymously;
- if you report your concerns, you will be afforded confidentiality unless you indicate or the law requires otherwise;
- concerns reported by you will be properly investigated with a view to establishing the truth, taking any appropriate disciplinary action, and correcting any wrongdoing where possible;
- you will be advised of the outcome of any investigation resulting from a concern that you have reported, and where appropriate and practicable, of any action as a result of the complaint and/or investigation;
- you will not be victimised or adversely affected because of your action in reporting your concerns, provided that there is a proper basis for your concerns, and that you have acted in good faith and without malicious intent.

2. SCOPE

This Policy applies to anyone who is or has been employed by Club Assist, or is otherwise engaged or has been engaged by or works for or has worked for Club Assist, including both past and present:

- employees (whether permanent, fixed-term or on a casual basis);



- contractors, consultants, secondees, associates, suppliers;
- officers or directors; or
- a relative or dependant of an individual referred to above, (together, **Workers**).

3. POLICY AND PROCEDURE

3.1. Responsibility to Report

All Workers have a responsibility to help detect, prevent and report **Reportable Matters** (see below definition). Further, Club Assist is committed to ensuring that all Workers have a safe, reliable and confidential way of reporting any Reportable Matters.

You are encouraged to raise concerns about any issue or suspicion of malpractice, at the earliest possible stage, with your immediate manager, and serious matters will then be escalated through to senior management.

You should report a Reportable Matter under this Policy if you:

- have previously reported a Reportable Matter and you are not satisfied with the response to your report;
or
- feel unable to raise the Reportable Matter with your manager, either because your manager is the subject of your report or because you have another reason to believe that your manager is unlikely to deal with the report properly.

What is a “Reportable Matter”?

A Reportable Matter is any concern (actual or suspected) about the following conduct, or the deliberate concealment of such conduct:

- financial irregularity (including a fraud against Club Assist or a customer or supplier);
- corrupt conduct;
- criminal conduct;
- failure to comply with any legal or regulatory obligation;
- failure to comply with any other obligation as a market licensee or clearing and settlement facility licensee, as a benchmark administrator or AFSL holder;
- unfair or unethical dealing with a customer (including participants and listed entities);
- unethical or other serious improper conduct, including serious breaches of Club Assist policies;
- misconduct, or an improper state of affairs or circumstances;
- danger to the public or the financial system; or



- offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more.

A Reportable Matter is not one that concerns a personal work-related grievance and no victimisation in relation to whistleblowing as defined under the Act. However, such conduct may be the subject of a complaint under our Anti-Discrimination, Harassment and Bullying Policy, or our Code of Conduct.

3.2. How to Report

Club Assist has engaged Deloitte Risk Advisory to provide an independent, external Whistleblower reporting service ("**Reporting Service**"). All workers under this policy may make disclose a Reportable Matter to the Reporting Service by the following five channels:

- A free-call to 1800 173 918; or
- via the Reporting Service website that can be reached at australia.deloitte-halo.com/clubassist; or
- Email to the address whistleblower@deloitte.com.au; or
- Facsimile to +61 3 9691 8182; or
- Mail to the reply-paid address of
Club Assist
Reply Paid 12528
A'Beckett Street, Melbourne,
Victoria 8006

In addition, a Reportable Matter under this Policy can be reported to a senior manager, officer or Director, auditor or actuary of Club Assist. This includes the Chairman, the CEO or your immediate supervisor, noting it may depend on the Reportable Matter and the person who is the subject of the Reportable Matter. On receipt of a Reportable Matter, the individual who has received the Reportable Matter will forward the information to the Reporting Service via one of the five channels stated above.

Club Assist has appointed a Whistleblower Protection Officer ("**WPO**") to manage the reporting and investigating process. The WPO will safeguard the interests of Workers making reports under this Policy and will ensure the integrity of the reporting mechanism.

The WPO reports directly to the Chief Executive Officer ("**CEO**"). The WPO also has access to independent advisers as and when required.

The current WPO is the Executive General Manager, Human Resources & Safety who can be contacted at michael.vogt@clubassist.com.au or (03)9797-8604.

The CEO and WPO will be notified of any disclosure made to the Reporting Service. The CEO and WPO will be the only members of staff at Club Assist who have access to the Reporting Service platform. Following notification of a disclosure to the Reporting Service, the CEO and WPO shall agree who will review the report and refer any reports that require further investigation to an appointed Whistleblower Investigation Officer ("**WIO**"). Should a report concern either the CEO or WPO, the report will be escalated to the Club Assist Audit and Risk Committee ("**ARC**") of the Board, who will subsequently review the report, and refer any reports that require further investigation to an appointed WIO.



The WIO will carry out or supervise the investigation of Reportable Matters made under this Policy.

The WIO will be appointed by the CEO and WPO, or the ARC at the time of the report, based on the appropriateness of the circumstances, and may be an individual who is a current 'Worker' as per the definition under this policy, or at the CEO's/WPO's discretion an independent external investigator may be appointed.

The CEO/WPO/ARC and WIO act independently of each other and the responsibilities of these roles do not reside with one person.

While reports can be made anonymously if preferred, this may affect the ability to investigate the matter properly and to communicate with you about your Reportable Matter.

You may be asked to consent to the CEO/WPO/ARC or WIO disclosing the details of your complaint to ensure that the matters raised may be thoroughly investigated but are not obliged to consent.

Nothing in this Policy should be taken as restricting you from reporting any matter or providing any information to a regulator (such as ASIC or APRA), the Club Assist's auditor or a member of the audit team or any other person in accordance with any relevant law, regulation or other requirement.

3.3. Action required when your Reportable Matter is made

The CEO and WPO must ensure that the matter is properly investigated by the CEO/WPO and/or WIO.

3.4. Investigation Process

Investigation processes will vary depending on the precise nature of the conduct being investigated. The purpose of the investigation is to determine whether or not your Reportable Matter is substantiated, with a view to Club Assist then rectifying any wrongdoing uncovered to the extent that this is practicable in all the circumstances.

The CEO/WPO/ARC and/or the WIO will make the necessary determinations as to how the investigation is to be conducted.

The investigation will be thorough, objective, fair and independent of you, anyone who is the subject of the Reportable Matter, and any business unit concerned.

3.5. Communicating with you about your Reportable Matter

You will be kept informed of the outcome of the investigation arising from your Reportable Matter, subject to considerations of the privacy of anyone who is the subject of the Reportable Matter and normal confidentiality requirements.

Where practicable, you will be provided with initial feedback within a week of making your report, and any further feedback on a fortnightly basis as the matter progresses. Should this not be practicable, you will be notified accordingly.

3.6. Your Protection

The person who you make a report to under this Policy may, if you agree, disclose your identity to the person appointed to investigate the matter, but will otherwise keep your identity confidential. They will ensure that all files relating to your report are kept secure, and that information received from you is held in confidence and is only disclosed to a person not connected with the investigation if:



- you have been consulted and have consented to the disclosure, or
- it is required or permissible by law.

It is a breach of the Act to disclose your name or any information that is likely to lead to your identity being disclosed.

It is possible that someone might deduce your identity without there having been a breach of confidentiality, if the nature of your report points to one particular individual having made it, or otherwise as a consequence of the nature of the investigatory process. This is not a breach of the Act.

Club Assist recognises that “whistleblowing” can be a very stressful and difficult thing to do. Provided that you have reasonable grounds to suspect the conduct you are reporting and that you have not yourself engaged in serious misconduct or illegal conduct, to the maximum extent possible you will not be subject to disciplinary sanctions by Club Assist in relation to any matters that you report.

Club Assist will take whatever action is possible consistent with this Policy to ensure that you are protected in accordance with Part 9.4AAA of the Act. Club Assist will make sure that you are not personally disadvantaged for making your report, whether by dismissal, demotion, any form of harassment, discrimination or any form of current or future bias.

Any person found in breach of the provisions in this Policy will be subject to disciplinary procedures, up to and including the termination of employment or engagement with Club Assist.

3.7. False Reporting

A false report of a Reportable Matter could have significant effects on Club Assist's reputation and the reputations of other staff members and could also cause considerable waste of time and effort.

Any deliberately false reporting of a Reportable Matter, whether under this Policy or otherwise, will be treated as a serious disciplinary matter.

3.8. Board

Club Assist's Directors will be informed of any material incidents reported under this Policy, subject to the confidentiality provisions of this Policy.

3.9. Records

Club Assist's Company Secretary will maintain a record of all whistleblowing incidents and actions taken under this Policy, so that the Policy can be periodically reviewed.

3.10. Relationship between this Policy and your Employment

It is a condition of any employment or engagement by Club Assist that all you will comply at all times with this Policy.

However, this Policy does not form part of any agreement between any person and Club Assist, nor does it constitute a terms and condition of any person's employment or engagement with Club Assist.

Any breach of this Policy will be taken seriously and may result in counselling and/or disciplinary action, up to and including summary dismissal. You are reminded that victimisation of a Whistleblower is a criminal offence, unlawful and will not be tolerated.



You are able to access this Policy on the Policies section of the Intranet, or by contacting the Human Resources department directly.

3.11. Review

This Policy will be reviewed every two years to ensure it remains consistent with all relevant legislative requirements, as well as the changing nature of the organisation. This Policy may be amended, withdrawn or replaced from time to time at the sole discretion of Club Assist.

3.12. Questions

Any questions about this Policy should be directed to the Executive General Manager, Human Resources and Safety.