

# Group Whistleblower Policy

## Purpose

Life Trading ("the Group") is committed to the highest standards of conduct, ethical behaviour and sound corporate governance. These values and principles mean that Life Trading fosters a culture of corporate compliance and ethical behaviour that encourages our people to report any concerns they see in their interactions with the Group. We are committed to ensuring raised concerns are dealt with effectively, securely, appropriately, and in accordance with the Corporations Act 2001 (Cth) (the Act).

The purpose of the Whistleblower Policy (the Policy) is to encourage and support the reporting of actual and suspected wrongdoing and misconduct.

The policy explains:

- how you can report concerns;
- which concerns will be addressed as "Whistleblower Disclosures" (e.g fraud, theft, bribery, harassment, insider trading, failing to disclose conflicts of interest);
- how Whistleblower Disclosures are managed and what Life Trading will do with any concerns that are not Whistleblower Disclosures; and
- how we will support and protect you as a Whistleblower.

## Scope

This policy applies to the Group, Directors, Employees and other persons described in this policy as an "Eligible Person" or "Eligible Recipient". It is provided to all employees and is available on Life Trading's website.

This policy is intended to apply in accordance with the laws of the relevant jurisdiction in all countries where we operate. For those parts of the Group that are subject to laws or regulatory requirements that conflict with this policy, the more stringent standard applies. Refer to **Appendix A** for requirements applicable to the United Kingdom.

This policy does not form part of any contract of employment or any industrial instrument.

## Policy Statement

All information received from you will be treated seriously, confidentially, and sensitively.

All Whistleblower Disclosures will be handled in accordance with this policy and applicable whistleblower legislation. Any form of actual or threatened victimisation (e.g termination, demotion, harassment, harm or injury) toward someone as a result of an actual or suspected Whistleblower Disclosure will not be tolerated. This sort of conduct is referred to as "Retaliation" in this policy.

## Eligible Person

An eligible person is anyone who is (or has been):

- an employee the Group (including directors, officers, managers, interns);
- a contractor, consultant, service providers supplier, business partner;
- broker, auditor of or working with the Group; or
- relative, spouse or dependant of one of the above (or a dependant of their spouse).

## Eligible Recipient

You can make a disclosure to each of the following as an eligible recipient:

- an officer (i.e. Chief Executive Officer), including a director or company secretary of the Group entity;
- a senior manager as defined under the Corporations Act
- a Group Auditor; or
- the Whistleblower Protection Officer.

Further details about these Eligible Recipients and their accountabilities are set out in the Accountabilities table in this policy.

## Reportable Conduct

Reportable Conduct is conduct in relation to the Group that you have a reasonable basis for suspecting:

- amounts to misconduct or an improper state of affairs such as:
  - Fraud, theft or dishonest conduct (e.g. falsification of records);
  - Corrupt behaviour (e.g. accepting a bribe, dishonestly taking advantage of an employment position);
  - Illegal, unethical or improper conduct (illicit drug use, violence, engaging in insider trading, manipulating financial markets, criminal damage);
  - A serious or systemic breach of an internal policy, including the Code of Conduct (e.g. failing to disclose conflicts of interests); or
  - Negligent acts, a breach of trust or a breach of duty; or
- indicates a significant risk to public safety or the stability of (or confidence in) the financial system; or
- constitutes an offence against, or breach of, certain Laws.

## Making a Disclosure

You may report a concern by contacting the Whistleblower Protection Officer as follows:

**Mail** The Whistleblower Protection Officer  
Life Trading  
Suite 502, 22 Central Avenue Manly NSW 2095

**Email** [whistleblower@lifetrading.com.au](mailto:whistleblower@lifetrading.com.au)

Details of other Eligible Recipients will be provided online.

Your concern will be assessed as a Whistleblower Disclosure (i.e. a concern that it being treated by the Group as a whistleblowing matter under this policy) if:

- you are an Eligible Person;
- your concern is Reportable Conduct; and
- you reported your concern to an Eligible Recipient.

Life Trading will respect and protect your identity if you choose to make an anonymous report. You can choose to remain anonymous while making a report, interacting with the Whistleblower Investigation Officer during an investigation of your report, as well as after your case is closed. At any given time, you can identify yourself, but this is your choice and at no point do you need to do this or will you be forced to provide your identity.

You may choose to report your concern to the Australian Securities and Investments Commission (ASIC) or the Australian Prudential Regulation Authority (APRA) in relation to a Reportable Conduct. Guidance on how to do so can be found [here](#).

You may choose to discuss your concerns with a legal practitioner for the purposes of obtaining legal advice or representation. You will be covered by the protections outlined in this policy if you have reported your concerns to a legal practitioner.

### **Public Interest and Emergency Disclosure**

In certain situations, the conduct or wrongdoing may be of such gravity and urgency that disclosure to the media or a parliamentarian is necessary. It is recommended that you contact an independent legal adviser prior to making any public interest or emergency disclosure. A public interest and emergency disclosure can only be made to:

- a journalist, defined to mean a person who is working in a professional capacity as a journalist for a newspaper, magazine, or radio or television broadcasting service; or
- a Member of the Parliament of the Commonwealth or of a State or Territory parliament.

You may only make a 'public interest disclosure' if:

- at least 90 days has passed since the disclosure was made to ASIC or APRA;
- you have reasonable grounds to believe that action is not being taken to address the matters which you have disclosed;
- you have reasonable grounds to believe that making a further disclosure to a journalist or member of parliament would be in the public interest;
- before making the public interest disclosure, you have given written notice to the body to which the previous disclosure was made that:
- includes sufficient information to identify the previous disclosure; and
- states that you intend to make a public interest disclosure.

You can also make a disclosure of reportable conduct to a member of parliament or a journalist in exceptional or 'emergency' situations however we encourage you to make your report to the Group where practicable in the first instance.

### **Concerns that are not Reportable Conduct**

Personal work-related grievances are generally not classified as Reportable Conduct. These are grievances relating to your employment (e.g. interpersonal conflicts between you and another employee, remuneration, performance reviews, transfers, promotion or disciplinary action). Personal work-related grievance will be dealt with in terms of the Group's Grievance Policy.

Any disclosures that do not fall within the definition of Reportable Conduct, will not qualify for protection under the Act but may be protected under legislative instruments such as the Fair Work Act 2009. It will be at the Group's discretion whether it considers there is a reasonable suspicion that the Reportable Conduct is occurring and/or whether the conduct constitutes "misconduct or improper state of affairs" under the Act.

## Legal Whistleblower protections

The Group is committed to ensuring that any person who makes a disclosure is treated fairly and does not suffer retaliation and that confidentiality is preserved in respect of all matters raised under this policy.

- **Protection from legal action:** you will not be subject to any civil, criminal or administrative legal action (including disciplinary action) for making a disclosure under this policy or participating in any investigation. Any information you provide will not be admissible in any criminal or civil proceedings other than for proceedings in respect of the falsity of the information.
- **Protecting your identity:** we will not share your identity, or information that is likely to lead to your identity being known, unless you give your consent, or it's allowed by law. We will always ask for your consent before disclosing your identity or any of the information you provide to another party;
- **Ensuring Fairness:** we are committed to ensuring you are treated fairly and that you are not disadvantaged or discriminated against as a result of speaking up. We will assess your report and take all reasonable and appropriate actions to consider, investigate and resolve the issues raised. Each report will be treated on its own merits in terms of the appropriate action or response but in all circumstances, we are committed to ensuring fairness to all parties involved.
- **Protection of Confidentiality:** we are committed to ensuring that confidentiality is preserved in respect of all matters raised under this policy.

These protections do not grant immunity for any misconduct that you have engaged in that is revealed in your disclosure.

## Potential Retaliation

Where there is a concern of retaliation against you from an employee, management or the company, the Group will take reasonable steps to protect you from:

- Termination of employment;
- Performance management;
- Harassment or bullying;
- Warnings or disciplinary actions;
- Discrimination;
- Any other action that can be perceived as retaliation for making a report.

## Considered Risk of Retaliation

In the case of "considered risk of retaliation" you should contact the Whistleblower Protection Officer. The Whistleblower Protection Officer will take action they feel is appropriate as well as come up with recommendations for how the situation can be resolved. Potential steps to protect you after retaliation has occurred can include:

- Taking leave.
- Being reassigned to other duties.
- Being reassigned to another location.

Despite these reasonable steps, and if retaliation occurs, it will not be tolerated and appropriate action (e.g. disciplinary action) will be taken against those responsible.

## **Wellbeing Support**

The Whistleblower Protection Officer will assist you in maintaining your wellbeing, which may include providing strategies to minimise and manage stress resulting from making the Whistleblower Disclosure or referring you to counselling and/or other professional services as appropriate. In addition to support available from the Whistleblower Protection Officer, if you are a current or former employee of the Group (or their immediate family member), you are able to access the Group's confidential counselling service, the Employee Assistance Program.

## **Investigation Process and Outcome**

The Group will investigate all matters reported under this policy as soon as practicable. The Whistleblower Investigation Officer will investigate the matter and where necessary, appoint an external investigator to assist in conducting the investigation. All investigations will be conducted in a fair, independent and timely manner and all reasonable efforts will be made to preserve confidentiality during the investigation.

If the report is not anonymous, the Whistleblower Investigation Officer will contact you, by your preferred method of communication to discuss the investigation process and any other matters that are relevant to the investigation.

Where possible, the Whistleblower Investigation Officer will provide you with feedback on the progress and expected timeframes of the investigation.

Once an investigation ends, the Whistleblower Investigation Officer will issue a report on, or summary of, the findings and the evidence on which the findings are based to the relevant management or decision maker. Depending on the circumstances of the Whistleblower Disclosure, and any privacy or confidentiality concerns, you, and/or the person who is subject of the Whistleblower Disclosure, will be informed of the findings; however, neither you nor the person who is the subject of the Whistleblower Disclosure will be provided with a copy of the investigation report / summary.

## **Escalation**

If, after receiving the summarised report of the investigation, you are not satisfied with the result, you can escalate this to the Whistleblower Protection Officer. You can provide this in writing for a formal review to take place. While the Whistleblower Protection Officer commits to review the request, the Group is under no obligation to re-open the investigation. If the Whistleblower Protection Officer concludes that the investigation was conducted properly and no new information exists that would change the results of the investigation, the investigation will be concluded.

## **Conflicts of interest**

All roles under this policy (Policy Role) must disclose any actual, potential or perceived conflicts of interest that they have in relation to a Whistleblower Disclosure to the Whistleblower Protection Officer and manage those conflicts in accordance with the Group Conflicts of Interest Policy. In the event that an individual holding a Policy Role has an actual, potential or perceived conflict in relation to a specific Whistleblower Disclosure or investigation, another person may be appointed to the Policy Role for the purposes of that Whistleblower Disclosure or investigation by relevant management or a member of Risk Legal and Compliance.

## Accountabilities

The accountabilities of designated roles under this policy are set out in the below table.

This policy role	Is accountable for
Eligible Recipient Whistleblower Protection Officer (WPO)	<ul style="list-style-type: none"><li>Assessing and monitoring any risks of retaliation and taking reasonable steps to protect Whistleblowers from those risks.</li><li>Assisting in maintaining the wellbeing of Whistleblowers.</li><li>Maintaining the confidentiality of Whistleblowers, where relevant.</li><li>Reviewing concerns raised by Whistleblowers to the WPO and, if material, escalating the concerns to an executive officer. For non-material concerns, taking such action as they consider appropriate.</li></ul>
Whistleblower Investigation Officer	<ul style="list-style-type: none"><li>Determining whether Whistleblower Disclosures should be investigated and, if so, conducting or commissioning an investigation in a timely, fair and objective manner (including by remaining independent of the Whistleblower and the person(s) about whom an allegation has been made).</li><li>Providing feedback on the progress and timeframes of the investigation to the Whistleblower, as appropriate.</li><li>To the extent permitted, informing the Whistleblower and/or person(s) subject of the Whistleblower Disclosure of the investigation findings</li></ul>
Eligible Recipient <ul style="list-style-type: none"><li>Board member</li><li>Executive Officer</li><li>Group Auditor</li></ul>	<ul style="list-style-type: none"><li>Receiving and referring Whistleblower Disclosures in accordance with this policy, including seeking consent (preferably in writing) to share a Whistleblower Disclosure in order for the concern to be assessed and, if appropriate, investigated.</li><li>Completing Whistleblower training.</li></ul>

## Other matters

Any alleged breach of this policy will be taken seriously and, if appropriate, will be separately investigated. Potential or realised breaches of obligations outlined in this policy must be escalated according to the Group Compliance Incident Procedure.

Any breach of this policy may be regarded as misconduct which may lead to disciplinary action (up to and including termination of employment).

The Group may unilaterally introduce, vary, remove or replace this policy at any time.

## Appendix A

### Requirement for the Group's operations in the United Kingdom

Reportable Conduct also includes anything that would amount to a 'Protected Disclosure' within the United Kingdom. Protections in the United Kingdom arise under the Employment Rights Act 1996.

A Protected Disclosure is a disclosure, made in the public interest, which in the reasonable belief of the Whistleblower making the disclosure shows that one or more of the following has been, is being or is likely to be committed:

- a criminal offence;
- a breach of legal obligation;
- a miscarriage of justice;
- danger to the health or safety of any individual;
- damage to the environment; or
- the deliberate covering up of wrongdoing in the above categories.

The Group will collect, use, store, transfer and otherwise process a Whistleblower's personal data including providing personal data to third parties and transferring personal data within and outside the European Economic Area, in accordance with applicable data protection regulations. Further details relating to the processing of such personal data are set out in the Personal Data Privacy and Protection Policy (and any other relevant policies and procedures relating to data protection in force from time to time).