

Whistleblower Policy

Corporate Services | Version 1 | Last updated February 2022

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1.0 Introduction

1.1 Purpose

MyBudget Pty Ltd ('MyBudget') has a strong values-based culture that encourages openness, integrity and accountability. MyBudget's Whistleblower Policy (the 'Policy') has been developed so that you can freely and without fear of intimidation, disadvantage or reprisal, raise any concerns you may have. We want you to be able to safely raise concerns about situations where you believe that MyBudget, including any of its controlled entities or related bodies corporate, globally (together, the MyBudget Group), or anyone connected to the MyBudget Group, have acted in a way that constitutes misconduct.

This Policy explains:

- How you can report such concerns;
- How you may be protected;
- What you can expect after reporting;
- How your concerns will be investigated; and
- Other sources of information that may be helpful to you in reporting your concern.

1.2 How will the Policy be made available?

The Policy is available for access from the [MyBudget process portal](#), as well as via the [public website](#).

1.3 Who is an Eligible Whistleblower?

An individual is an Eligible Whistleblower in relation to MyBudget if they are or have been, any of the following:

- An officer of MyBudget;
- An employee of MyBudget;
- An individual who supplies goods or services to MyBudget (whether paid or unpaid);
- An employee of a person that supplies goods or services to MyBudget (whether paid or unpaid);
- An individual who is an associate of MyBudget; or
- A relative, dependent or spouse of an individual referred to above.

1.4 What is a Reportable Matter?

Reportable Matters involve information that a person has reasonable grounds to suspect concerns misconduct, or an improper state of affairs or circumstances in relation to MyBudget or a related body corporate of MyBudget (entities in the MyBudget Group).

Reportable Matters include conduct that may not involve a contravention of a particular law. In addition, information that indicates a significant risk to public safety or the stability of, or confidence in, the financial system is also a disclosable matter, even if it does not involve a breach of a particular law.

Examples of Reportable Matters include, but are not limited to:

- Breaches of MyBudget's Code of Conduct;
- Practices or behaviours of concern relating to compliance with policies, procedures or the law (i.e. including anything you think may be illegal);
- Unethical or unprofessional behaviour;
- Issues of honesty or integrity, including internal fraud, theft, bribery and corruption;
- Conflicts of interest, including those relating to outside business interests, relationships, improper payments and donations;
- Breaches of privacy or confidentiality;
- Actual or potential breaches of human rights standards;
- Concerns that pose a danger to the public or financial system;
- Misconduct or an improper state of affairs or circumstances concerning the MyBudget Group generally, including the tax affairs of the MyBudget Group; and
- Practices or behaviours of concern relating to your current or past employment within the MyBudget Group that:
 - Have significant implications for the MyBudget Group;
 - Present a danger to the public or financial system; or
 - Are otherwise a breach of law within the jurisdiction of the relevant country.

Reportable Matters may also involve information about an entity of the MyBudget Group if you have reasonable grounds to suspect that the information indicates that those entities (including their employees or officers) have engaged in conduct that:

- Constitutes an offence against, or contravention of, a provision of any of the following:

- The Corporations Act;
- The Australian Securities and Investments Commission 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 2009; and/or
- The SIS Act; or
- Constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more.

1.5 What is *not* a Reportable Matter?

Please note that disclosures that are not about Reportable Matters do not qualify for protection under the Corporations Act.

However, matters that are not eligible for protections under the Corporations Act for the purpose of this Policy, may be protected under other legislation, such as the Fair Work Act 2009 (Fair Work Act).

Examples of matters not covered under this Policy include:

- Client Complaints: Where a client expresses dissatisfaction related to MyBudget’s products, services, staff or the handling of a complaint and a response or resolution is explicitly or implicitly expected or legally required, this is treated as a [complaint](#); and
- Personal work-related grievances: Where a current or former employee of MyBudget wants to report a grievance that affects them personally (and only them) in the context of current or past employment, they can contact MyBudget’s People and Culture team (hr@mybudget.com.au).
Examples of personal work-related grievances are:
 - A conflict between the discloser and another employee;
 - The decision about engagement, transfer or promotion of the discloser; or
 - The decision to suspend or terminate the engagement of the discloser, or otherwise discipline the discloser.

However, a personal work-related grievance may still qualify for protection if:

- It includes information about misconduct, or information about misconduct includes or is accompanied by a personal work-related grievance;

- The entity of the MyBudget Group has breached employment or other laws punishable by imprisonment for a period of 12 months or more, engaged in conduct that represents a danger to the public, or the disclosure relates to information that suggests misconduct beyond the discloser's personal circumstances;
- The discloser suffers from or is threatened with detriment for making a disclosure; or
- The discloser seeks legal advice or legal representation about the operation of the Whistleblower protections under the Corporations Act.

1.6 Who can you contact if you need additional information before making a disclosure?

You may contact any Whistleblower Protection Officer within the Whistleblower Program Team, including:

- Senior Leader - People and Culture;
- Compliance Lead;
- People and Culture Advisor;
- General Counsel;
- Philippines Operations Leader; or
- Country Manager, MyBudget Sri Lanka.

In addition, in Australia you may also be able to obtain free independent legal advice from a [Community Legal Centre](#) or, in South Australia you may also contact the [Legal Services Commission of South Australia](#).

2.0 Making a Whistleblower Report

2.1 When should you make a Whistleblower Report?

When making a disclosure, a person must have reasonable grounds to suspect that a Reportable Matter has occurred. A mere allegation with no supporting information is not likely to be considered as having reasonable grounds. However, a discloser does not need to prove their allegations and you will not be subject to a penalty if your supporting information turns out to be incorrect.

You must not make a disclosure that you know is untrue or is misleading. This would be considered a serious matter and any intentionally false or misleading disclosures may result in disciplinary action.

2.2 Who can you make a Whistleblower Report to?

You can make a Whistleblower Report to any of the below. For the purposes of this Policy, they are considered Eligible Recipients. The role of Eligible Recipients is to receive disclosures that qualify for protection. You need to make a disclosure directly to one of the Eligible Recipients in order to be able to qualify for protection as a whistleblower under the Corporations Act.

Please note that the Eligible Recipients outlined in 2.2.1 and 2.2.2 are either Eligible Recipients as prescribed by the Corporations Act, or as authorised by MyBudget to receive disclosures that may qualify for protection under the Corporations Act.

2.2.1 Internal Eligible Recipients

- The Whistleblower Program Team directly (WP Team):

Email: whistleblowing@mybudget.com.au

Post: MyBudget - WP Team
PO Box 3433
Rundle Mall SA 5000

- Any Whistleblower Protection Officer (WPOs) within the WP Team, including:
 - Senior Leader - People and Culture;
 - Compliance Lead;
 - People and Culture Advisor;
 - General Counsel;
 - Philippines Operations Leader; and
 - Country Manager, MyBudget Sri Lanka.
- A confidential entry on the Whistleblower Google Form:
 - [Click here](#) to access the form.
 - Please note, this form does not log your email address. Once completed, notification of the form submission will be sent to whistleblowing@mybudget.com.au

- The only users with access to view the submissions are the Senior Leader, People and Culture and the People and Culture Advisor. As such, please contact an alternate WPO directly, should your report concern these individuals.
- An officer (director) or Senior Leader of any entity of the MyBudget Group.

2.2 External Eligible Recipients

- An auditor of any entity of the MyBudget Group, or a member of an audit team, conducting an audit of any entity of the MyBudget Group;
- An actuary of any entity of the MyBudget Group;
- To ASIC, APRA or another Commonwealth body prescribed by regulation; and
- Where making a Public Interest Disclosure or Emergency Disclosure under certain circumstances (see below):
 - A parliamentarian;
 - A journalist.

2.3 Public Interest Disclosures and Emergency Disclosures

It is important that you understand the criteria for making a public interest or emergency disclosure. We have provided the relevant criteria from the Corporations Act in 2.2.1, and 2.2.2 (accurate as of the date of this Policy).

Please note that a disclosure must have previously been made to ASIC, APRA or a prescribed body and written notice provided to the body to which the disclosure was made. In addition, in the case of a public interest disclosure, at least 90 days must have passed since the previous disclosure.

Prior to making a public interest disclosure, or an emergency disclosure, you should seek independent legal advice.

2.3.1 What is a Public Interest Disclosure?

A 'public interest disclosure' is the disclosure of information to a journalist or a parliamentarian, where:

- At least 90 days have passed since the discloser made the disclosure to ASIC, APRA or another Commonwealth body prescribed by regulation;
- The discloser does not have reasonable grounds to believe that action is being, or has been taken, regarding their disclosure;
- The discloser has reasonable grounds to believe that making a further disclosure of the information is in the public interest; and

- Before making the public interest disclosure, the discloser has given written notice to the applicable body (i.e. the body to which the previous disclosure was made) that:
 - Includes sufficient information to identify the previous disclosure; and
 - States that the discloser intends to make a public interest disclosure.

2.3.2 What is an Emergency Disclosure?

An 'emergency disclosure' is the disclosure of information to a journalist or parliamentarian, where:

- The discloser has previously made a disclosure of the information to ASIC, APRA or another Commonwealth body prescribed by regulation;
- The discloser has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment;
- Before making the emergency disclosure, the discloser has 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 the discloser intends to make an emergency disclosure; and
- 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.

2.4 What should you include in the Report?

Please provide as much detailed information as possible so that your report can be investigated thoroughly and effectively. Details that will help us include:

- Date, time and location;
- Names of the person(s) involved, roles and their business group;
- Your relationship with the person(s) involved;
- The general nature of your concern;
- How you became aware of the issue;
- Possible witnesses; and
- Other information that you have to support your report.

2.5 Can you make a Whistleblower Report anonymously?

MyBudget respects your right to make a disclosure anonymously. This might include using a pseudonym or email address that is not able to be linked to you. We note that you may make a disclosure anonymously and still be protected under the Corporations Act.

However, where you choose to not maintain an ongoing dialogue, this may hinder our ability to investigate the issue efficiently and take appropriate action.

If you let us know who you are, we can directly discuss your concerns with you, and our WP Team will be better able to assist you with any questions or concerns you may have. Please see 'Identity Protection' and 'Confidentiality and Consent' below for further details.

In any event, if you wish to remain anonymous, we recommend that you maintain ongoing two-way communication with us, so that we can ask follow-up questions or provide feedback.

3.0 I have made a report under this Policy, what happens next?

3.1 Who will assess or investigate your concerns?

After receiving a report from you, the WP Team will manage the investigation process.

The investigation process can be summarised as follows:

1. Receipt of your disclosure;
2. Assessment of how you should be supported and protected;
3. Assessment of whether your disclosure qualifies for protection;
4. Assessment of whether your disclosure requires a formal, in-depth investigation;
5. Where an investigation is required:
 - a. Consideration of any conflicts of interest and appointment of an appropriate Whistleblower Investigator;
 - b. Undertaking the investigation;
 - c. Supporting and protecting you during and after the investigation; and
6. Communicating with you, including about the outcome of the investigation.

3.2 Who are Whistleblower Investigators?

Whistleblower Investigators are MyBudget team members with the appropriate skills and subject matter expertise to investigate your concerns efficiently and confidentially. Please note, when selecting a Whistleblower Investigator, the WP Team will consider the proximity of the proposed Investigator to the matter and also the nature of their relationship to the discloser.

3.3 Confidentiality and Consent

If you have let us know who you are, you will be contacted for your consent in relation to how you would prefer information about your identity, including any information that is likely to identify you, to be handled (hereafter, all such information will be referred to as your Identity). You can select one of three options for protecting your Identity:

- **Confidential** - This means that you consent to the WPO and WP Team knowing your identity and for the WPO and WP Team to disclose your identity for the purpose of carrying out the investigation. This is the preferred option because MyBudget will be best placed to fully investigate the matter, and provide you with ongoing protection and support;
- **Partially Anonymous** - This means that you have consented to only the WPO and WP Team knowing your identity. Whilst this approach is possible, it may create some limitations for investigative purposes which the WP Team can talk to you about; or
- **Anonymous** - This means you haven't told MyBudget, the WP Team or the WPO who you are. Such reports can only be made via the [Google Form](#) or through the use of an anonymous email or pseudonym. You may choose not to answer any questions asked of you, which you feel could reveal your identity. Note that for legal and regulatory reasons, MyBudget may need to disclose your identity to lawyers, regulators and or law enforcement authorities, regardless of the level of consent you have provided. However, if you choose to remain anonymous *and* do not provide us with a means of contacting you, we may not be able to undertake a complete and thorough investigation.

To help protect you and the integrity of any investigation, we ask that you do not discuss the details of your report with those outside the WP Team, except as required by law.

3.4 What is the investigation process?

Although the specific investigation steps may vary on a case-by-case basis, MyBudget requires that all investigations:

- Follow a fair process;
- Be conducted as quickly and efficiently as the circumstances permit;
- Determine whether there is enough evidence to substantiate the matters reported; and
- Be independent of the person(s) concerned with the allegations.

Investigation methods may include, but are not be limited to:

- Reviewing HR documentation;
- Listening to phone calls;
- Reviewing internal emails or inter-staff communications;
- Reviewing surveillance cameras; and
- Interviewing MyBudget staff.

3.5 When will you hear back?

A WPO or the WP Team will provide you with regular updates on progress and the outcomes of your report, subject to any confidentiality constraints. These updates may be written or verbal, depending on what is appropriate in the circumstances. As noted above, if you choose to remain anonymous and do not provide us with a means of contacting you, we will not be able to provide you with updates or outcomes.

You may also be contacted by the Whistleblower Investigator and asked to provide further information for the purpose of the investigation. If you have not provided your consent to be contacted, choose to decline or can't provide further information, this may affect MyBudget's ability to investigate your concerns; however, you will be advised if this is the case.

Any individuals who are accused of misconduct in a report will be given an opportunity to respond to the allegations, before any disciplinary action (if appropriate) is taken.

Whilst the timeframe will vary, the WP Team will provide you with an estimate at the commencement of the investigation. Please note that where this needs to be extended due to the complexity of the matter, you will be notified.

3.6 Who will be notified of the outcome?

In addition to the Risk and Compliance Committee receiving de-identified information of reports made and action taken, the discloser will also, generally, be notified of the findings of the investigation. There may, however, be circumstances where it is not appropriate to provide details of the outcome of the investigation to the discloser. In these circumstances, you will be notified accordingly.

3.7 Reviewing a completed investigation

If you are not satisfied that your report has been investigated and acted upon in line with this Policy, you may contact the Compliance Lead to request a review. If the report involves the Compliance Lead, you may alternatively contact the Senior Leader, People and Culture.

4.0 Legal Protections for Disclosers

A discloser qualifies for protection as a whistleblower under the Corporations Act if they are an Eligible Whistleblower in relation to MyBudget and:

- They have made a disclosure of information relating to Reportable Matter directly to an Eligible Recipient or to ASIC, APRA or another Commonwealth body prescribed by regulation;
- They have 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, including where the legal practitioner concludes that a disclosure does not relate to a 'disclosable matter': or
- They have made an Emergency Disclosure or Public Interest Disclosure to a journalist or a parliamentarian.

Please note that these protections apply to you regardless of whether any concerns raised in a report are found to be true, provided that you are acting honestly and ethically and made the report on reasonable grounds. These protections also apply to individuals conducting, assisting or participating in an investigation.

4.1 Identity Protection

MyBudget has legal obligations under the Corporations Act to protect the confidentiality of a discloser's identity.

A person cannot disclose the identity of a discloser or disclose information that is likely to lead to the identification of a discloser (which they have obtained directly or indirectly because the discloser made a disclosure that qualifies for protection).

However, a person may disclose *the identity of the discloser*:

- To ASIC, APRA, or a member of the Australian Federal Police (within the meaning of the Australian Federal Police Act 1979);
- To a legal practitioner (for the purposes of obtaining legal advice or legal representation about the whistleblower provisions in the Corporations Act);
- To a person or body prescribed by regulations; or
- With the consent of the discloser.

Nevertheless, a person can disclose the *information contained in a disclosure* with or without the discloser's consent if:

- The information does not include the discloser’s identity;
- The entity removes information relating to the discloser’s identity or other information that is likely to lead to the identification of the discloser (e.g. the discloser’s name, position title and other identifying details); and
- It is reasonably necessary for investigating the issues raised in the disclosure.

It is illegal for a person to identify a discloser, or disclose information that is likely to lead to the identification of the discloser, outside of the exceptions above. Where you feel a person has illegally identified you as a discloser, this should be reported to the Senior Leader - People and Culture. Alternatively, you may lodge a complaint with a regulator, such as ASIC, APRA or the ATO for investigation.

4.1.1 How will MyBudget ensure that your identity is secure?

The following measures are in place to ensure that information that might identify you is handled in line with your preferences (see ‘Confidentiality and Consent’) above:

- The Whistleblower [Google Form](#) does not record your email or require login to use. There is only one user who has access to the form responses, as detailed above;
- The assigned WPO will contact you to discuss all information in the disclosure, to clarify any information that may identify you, and confirm how you would like this information to be handled; and
- The Whistleblower shared inbox is limited to those individuals listed in this Policy as WPOs.

In order to reduce the risk that the discloser will be identified from the information contained in a disclosure, MyBudget will take steps that include, but are not limited to, ensuring that:

- All personal information or reference to the discloser witnessing an event will be redacted;
- The discloser will be referred to in a gender-neutral context;
- Where possible, the discloser will be contacted to help identify certain aspects of their disclosure which could inadvertently identify them; and
- Disclosures will be handled and investigated by qualified staff.

In addition, MyBudget will ensure that it maintains secure record-keeping and information-sharing processes. This includes, but is not limited to, ensuring that:

- All paper and electronic documents and other materials relating to disclosures will be stored securely;
- Access to all information relating to a disclosure will be limited to those directly involved in managing and investigating the disclosure;
- Only a restricted number of people who are directly involved in handling and investigating a disclosure will be made aware of a discloser's identity (subject to the discloser's consent) or information that is likely to lead to the identification of the discloser;
- Communications and documents relating to the investigation of a disclosure will not be sent to an email address or to a printer that can be accessed by other staff; and
- Each person who is involved in handling and investigating a disclosure will be reminded about the confidentiality requirements, including that an unauthorised disclosure of a discloser's identity may be a criminal offence.

4.2 Protection from Detrimental Conduct

There are legal protections under the Corporations Act for protecting a discloser, or any other person, from detriment in relation to a disclosure.

A person cannot engage in conduct that causes detriment ("Detrimental Conduct") to a discloser (or another person), in relation to a disclosure, if:

- The person believes or suspects that the discloser (or another person) made, may have made, proposes to make or could make a disclosure that qualifies for protection; and
- The belief or suspicion is the reason, or part of the reason, for the conduct.

In addition, a person cannot make a threat to cause detriment to a discloser (or another person) in relation to a disclosure. A threat may be *express* or *implied*, or *conditional* or *unconditional*. A discloser (or another person) who has been threatened in relation to a disclosure does not have to actually fear that the threat will be carried out.

Examples of what may be considered detriment include:

- Retaliation, dismissal, suspension, demotion, or having your engagement with MyBudget otherwise terminated;
- Harassment, threats or intimidation;
- Discrimination, subject to current or future bias, or derogatory treatment;
- Injury in employment, and harm including psychological harm;

- Damage or threats to your property, business, financial position or reputation; or
- Revealing your Identity as a Whistleblower without your consent or contrary to this Policy.

Please note that the following is not considered Detrimental Conduct:

- Administrative action that is reasonable for the purpose of protecting a discloser from detriment (e.g. moving a discloser who has made a disclosure about their immediate work area to another office to prevent them from detriment); and
- Managing a discloser's unsatisfactory work performance if the action is in line with MyBudget's performance management framework.

Where MyBudget carries out administrative or management action, you will be made aware, where relevant, of the reasons for the action.

4.2.1 How will MyBudget support and protect disclosers from detriment?

MyBudget will ensure that it takes reasonable steps to support and protect disclosers from detriment.

These steps may include, but are not limited to:

- Conducting an assessment of the risk of detriment against a discloser and/or another person, as soon as possible after receiving a Whistleblower Report;
- Ensuring employees have access to an Employee Assistance Program (**EAP**) provider;
- Taking reasonable administrative action, where appropriate, to ensure the protection of a discloser from detriment;
- Conducting annual Whistleblower refresher training for management; and
- Maintaining an independent and impartial investigation process which enables disclosers to lodge a complaint if they have suffered detriment.

4.2.2 What do you do if you are subjected to Detrimental Conduct?

If someone at MyBudget, including any supplier to MyBudget, engages in Detrimental Conduct against you, please immediately contact a WPO, the WP Team or the Senior Leader - People and Culture.

Where the Detrimental Conduct against you involves a WPO, you should report the matter to the Compliance Lead. If the WPO is the Compliance Lead, report the matter to the Senior Leader, People and Culture.

It is important that you report Detrimental Conduct immediately so that MyBudget can protect you.

In addition, you may seek independent legal advice or contact regulatory bodies, such as ASIC, APRA or the ATO, if you believe you have suffered detriment.

4.2.3 What will happen when you report Detrimental Conduct?

Reports of Detrimental Conduct will be treated confidentially and will be investigated as a separate matter by an Officer who is not involved in dealing with the initial disclosure. The investigation findings will be discussed with the Risk and Compliance Committee.

The potential implications for any person found to be guilty of engaging in Detrimental Conduct include disciplinary action and/or termination of engagements or contracts.

4.3 Compensation and other remedies

A discloser (or any other employee or person) can seek compensation and other remedies through the courts if:

- They suffer loss, damage or injury because of a disclosure; and
- MyBudget failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

We encourage disclosers to seek independent legal advice.

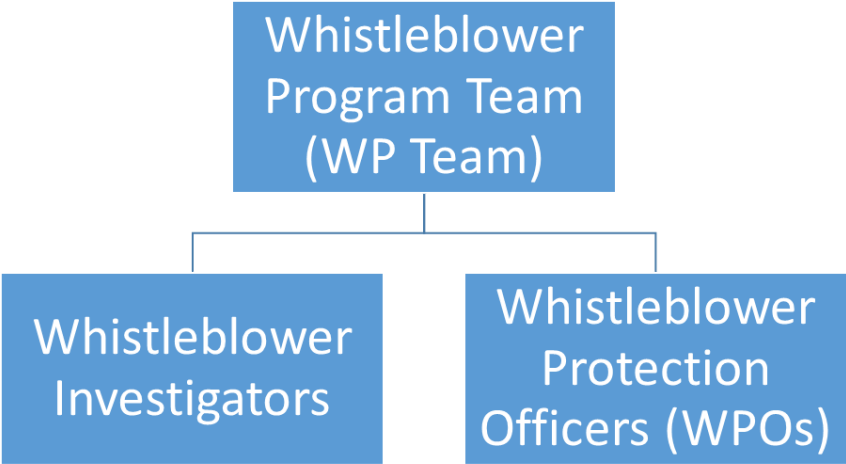
4.4 Civil, criminal and administrative liability protection

A discloser is protected from any of the following in relation to their disclosure:

- Civil liability (e.g. any legal action against the discloser for breach of an employment contract, duty of confidentiality or another contractual obligation);
- Criminal liability (e.g. attempted prosecution of the discloser for unlawfully releasing information, or other use of the disclosure against the discloser in a prosecution (other than for making a false disclosure)); and
- Administrative liability (e.g. disciplinary action for making the disclosure).

Please note that the protections do not grant immunity for any misconduct a discloser has engaged in that is revealed in their disclosure.

5.0 Roles and Responsibilities



5.1 Whistleblower Program Team (WP Team)

- Comprised of all Whistleblower Protection Officers (WPOs);
- Will assess reports received as a group;
- Administer or assist individual WPOs in the administration of this Policy;
- Maintain a secure and restricted record of all reports made under this Policy;
- Report to MyBudget’s Risk and Compliance Committee on reports made in the preceding period, including de-identified details of reports made, actions taken and the timeframe for finalising each disclosure;
- Arrange role-specific training as and when required; and
- Conduct a biennial review of this Policy so that it remains effective.

5.2 Whistleblower Investigators (WI)

- Selected on an ad hoc basis by the WP Team, based on the nature and circumstances of the report;
- Investigate reports in accordance with their appointment and this Policy;
- Maintain confidentiality of their identity and reports they are investigating;
- Immediately report concerns in relation to any Detrimental Conduct to the Whistleblower’s nominated WPO and the WP Team;

- Plan the investigation of matters relating to the report and report back to the WPO on the proposed investigation approach before commencing, within 7 days of receiving the briefing, together with any proposed strategy to stop, prevent or mitigate the reported misconduct;
- Take steps to protect or preserve evidence such as documents, materials and equipment;
- Gather documents, information and evidence relating to the report;
- Draw objective conclusions based on a fair assessment of the evidence gathered during the investigation;
- Keep comprehensive records of the investigation process;
- Make recommendations to the WPO about how to implement the strategy in relation to how reported misconduct can be stopped, prevented and or mitigated in future;
- Report back to the WPO on the progress of the investigation every 14 days after the initial 7-day update;
- Make recommendations to the WPO about any appropriate disciplinary actions or contractual actions with respect to any respondent(s);
- Comply with the directions of the WPO in relation to any further follow-up, reporting action and requirements including the implementation of any recommendations; and
- Complete any training mandated by the WP Team.

5.3 Whistleblower Protection Officers (WPOs)

- Receive reports and protect the interests of reporters;
- Determine whether the report falls within the scope of the Policy;
- Determine whether and how a report should be investigated;
- Appoint a WI where an investigation is deemed appropriate;
- Ensure investigations are conducted in accordance with this Policy;
- Ensure reports are referred to the WP Team in accordance with this Policy;
- Ensure any reports involving a Director is reported to the Senior Leader, People and Culture;
- Ensure any reports involving a Director (or Country Head) of a related entity in the MyBudget Group are, if required, reported to the Senior Leader of People and Culture;
- Update disclosers on progress and details of outcomes to the fullest extent possible;
- Maintain confidentiality of the discloser's identity and reports received to the fullest extent possible;
- Immediately report concerns in relation to any Detrimental Conduct to the WP Team;

- Determine appropriate courses of action to remediate or act on the WI's investigation report in conjunction with other stakeholders, if appropriate;
- Make recommendations to prevent future instances of reportable misconduct;
- Complete any training mandated by the WP Team; and
- Seek to ensure the integrity of the Whistleblower Program is maintained.

6.0 Review of this Policy

This Policy will be periodically reviewed by the WP Team and updated as needed. In the absence of further review being required, this will occur every two years. Staff members who have roles under this Policy will receive training on discharging their responsibilities and will be advised of any changes to this Policy and their responsibilities as required.

Internal Version Control

Version History

Version Number	Date	Approved By	Brief Description
1	07/02/2022	Katherine Bauer	Final Version

Stakeholders Consulted for Current Version

Name	
Paul Southgate	Senior Leader, People and Culture
Dara McDaniel	General Counsel
Timothy Mavratzakis	Compliance Lead
Katherine Bauer	Senior Leader, Corporate Services