



# Whistleblower Policy

## Genus Life Insurance Services Pty Ltd

ABN: 89 631 536 537

AFS Authorised Representative Number: 1276122

The Board of NobleOak Life Limited adopted this policy on 20 December 2019. This policy applies to all of NobleOak Life Limited's subsidiary companies as part of the NobleOak group. Genus Life Insurance Services Pty Ltd is part of the NobleOak group.

**20 December 2019**

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## Definitions and Interpretation

In this Policy unless the context otherwise requires or the contrary intention appears:

**“Act”** means the Life Insurance Act 1995 as amended from time to time.

**“AFS Licence”** means Australian Financial Services Licence issued under the Corporations Act.

**“APRA”** means the Australian Prudential Regulation Authority.

**“ASIC”** means the Australian Securities and Investments Commission.

**“ATO”** means the Australian Taxation Office.

**“Board”** means the board of Directors of NobleOak from time to time.

**“Board Audit Committee”** means the committee appointed by the Board to monitor and manage audit processes.

**“CEO”** means the Chief Executive Officer of NobleOak from time to time.

**“Chief Risk Officer”** means the person appointed to manage and oversee NobleOak’s compliance with its statutory obligations and Board policies.

**“Compliance Plan”** means NobleOak’s compliance plan from time to time.

**“Conflicts Policy”** means NobleOak’s policy on the management of conflicts of interest from time to time.

**“CPS 520”** means APRA’s Prudential Standard CPS 520 on Fit and Proper.

**“Director(s)”** means director(s) appointed to the NobleOak Board from time to time.

**“Fit and Proper Policy”** means NobleOak’s Fit and Proper Policy under CPS 520.

**“Governance Officer”** means a person named in Appendix 1 of this Policy as such and is responsible for receiving Whistleblower disclosures of Reportable Conduct and overseeing resolution.

**“Life Company”** means a life insurance company as defined by the Act.

**“NobleOak”** refers to NobleOak Life Limited in its capacity as a life insurance company under the Act and its subsidiaries.

**“Policy”** means this policy.

**“Regulator(s)”** means any relevant regulatory body, including APRA, ASIC, ATO and any other State or Federal Government body responsible for regulation of NobleOak and/or its business activities.

**“Reportable Conduct”** means conduct that:

- a. Breaches legislation, regulations or local government by-laws or is otherwise illegal;

- b. Is corrupt or is an abuse of public trust or position as a public official;
- c. Is dishonest or fraudulent;
- d. Perverts the course of justice;
- e. Unreasonably endangers health and safety or the environment;
- f. Is maladministration (e.g. unjust, based on improper motives, is unreasonable, oppressive or negligent);
- g. Is serious or substantial waste (including public money or public property);
- h. Is gross mismanagement or repeated breaches of administrative procedures;
- i. Has financial or non-financial loss detrimental to the interests of NobleOak;
- j. Is an unethical breach of the NobleOak Code of Conduct;
- k. Is serious improper conduct that could give reasonable grounds for disciplinary action.

**“Responsible Person”** means:

- a. Director(s) of NobleOak;
- b. Senior Manager(s) of NobleOak;
- c. the Auditors appointed by NobleOak;
- d. the Appointed Actuary of NobleOak;
- e. Persons who perform activities for a subsidiary of NobleOak where those activities may materially affect the whole, or a substantial part, of the business of NobleOak or its financial standing, either directly or indirectly;<sup>1</sup>
- f. Any person designated by APRA to be a responsible person on the basis that they play a significant role in the management or control of the life company, or their activities may materially impact on prudential matters and which is communicated to NobleOak in writing by APRA;<sup>2</sup> and may include a consultant, contractor or employee of a subsidiary or otherwise related company.

**“Risk Management Committee”** means the Committee appointed to oversee risk management and compliance within the Company and support and provide protection to the Whistleblower according to this Policy.

**“Standards”** means the APRA Prudential Standards under Section 230A (1) (a) of the Act.

**“Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019”** means the Act which received Royal Assent on 12 March 2019.

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<sup>1</sup> Attachment E CPS 520

<sup>2</sup> Paragraph Attachment E CPS 520

“**Whistleblower**”<sup>3</sup> means a person who, whether anonymously or not, makes, attempts to make or wishes to make a report in connection with reportable conduct and wishes to avail themselves of protection against reprisal for having made the report. Whistleblowers include an individual who is, or has been: an officer of NobleOak, an employee of NobleOak, an individual who supplies services or goods to NobleOak (paid or unpaid), an employee of a person that supplies services or goods to NobleOak (paid or unpaid), an individual who is an associate of NobleOak, a relative of an individual referred to previously and a dependant of an individual referred to previously or of such an individual’s spouse,

“**Workers**” means all NobleOak Directors, Responsible Persons, officers, employees and contractors (where a “contractor” is a person performing an internal business function under the direction and control of NobleOak management).

## Objective

NobleOak’s Fit and Proper Policy requires that there be a separate policy to promote and encourage a Whistleblower to report any known or suspected breach of:

- compliance with NobleOak’s obligations as a Life Company under the Act, its obligations under the Corporations Act, the Standards or any other law relevant to its operations; or
- Board policies including this Policy, the Fit and Proper Policy and the Conflict of Interest Policy & Procedures, or any wrongdoing of any kind (**collectively referred to in this Policy as a Breach**).

This Policy sets out the standards and procedures for dealing with reports of any known or suspected breach (or contravention) that is of legitimate concern, within NobleOak, providing a convenient and safe reporting mechanism and protection for Workers (including current and former employees) and other relatives who make a serious disclosure of any known or suspected Breach.

Transparent Whistleblower policies are essential to good risk management and corporate governance. They help uncover misconduct that may not otherwise be detected.

## Dual Whistleblower protection regimes

The law provides for Whistleblower protection under a corporations law regime and a tax law regime.<sup>4</sup> A person that wants to rely on a regime will need to ensure they meet the requirements of the specific regime. The regulatory bodies responsible for a regime provide information on the regime they are responsible for on their website and it is important that this information be considered by a relevant person -

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<sup>4</sup> Part 9.4AAA Corporations Act 2001; Part IVD of the Taxation Administration Act 1953

Regime	Regulator	Website
Corporations law	ASIC	<a href="https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/">https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/</a>
Tax law	ATO	<a href="https://www.ato.gov.au/general/gen/Whistleblowers/">https://www.ato.gov.au/general/gen/Whistleblowers/</a>

This policy applies to both regimes. We have included comments on both regimes where relevant to inform users.

## Whistleblower Protections

The Whistleblower protection regime under the corporations law<sup>5</sup> provides protection for Whistleblowers who report misconduct about companies and company officers. The corporations law regime:

- applies to current and former:
  - employees;
  - officers;
  - contractors and employees of contractors;
  - as well as a spouse, relative or dependent of an employee, officer, contractor or employee of a contractor; and
  - anonymous disclosures,
- creates civil penalty provisions, and in addition to the existing criminal offences, for causing detriment to (or victimising) a Whistleblower and for breaching a Whistleblower's confidentiality,
- give protections for Whistleblowers in certain circumstances if they go public with concerns about dangers to the public or matters in the public interest, and
- provide Whistleblowers with easier access to compensation and remedies if they suffer detriment.

The tax law regime applies to current and former employees, dependents and spouses and provides for similar offences and protection to that under the corporations law regime.

## Guiding Principles

NobleOak requires its Workers and its representatives to maintain high standards of business and personal ethics in the conduct of their duties and responsibilities. It is therefore, committed to and promotes within its business operations, a strong compliance culture where all Workers accept equal responsibility for compliance. Transparency and openness

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<sup>5</sup> Part 9.4AAA Corporations Act 2001

of communication of any known or suspected Breach is an essential part of that culture to ensure that compliance or misconduct issues are raised and resolved at the earliest possible stage, and that such action is acknowledged as being encouraged and valued by NobleOak and will be properly investigated to establish the truth and correct any Breach where possible.

NobleOak maintains a culture where legitimate concerns are able to be reported without fear of retaliatory action or retribution on part of the Whistleblower. Any Whistleblower who makes a disclosure will be treated with dignity and respect and afforded confidentiality, unless indicated (or the law requires) otherwise.

## **1. How this Policy is to be made available to officers and employees of the company**

To ensure that this Policy is brought to the attention of Workers, a copy of this Policy will be provided on joining NobleOak by HR Administrator to all employees and contractors and will also be accessible on NobleOak's internal computer network (staff policy directory) and available to its Directors via Diligent Board Books. <sup>6</sup>

## **2. To whom disclosures that qualify for protection under the law may be made, and how they may be made.**

It is important for Whistleblowers to be sure of NobleOak's arrangements for reporting a matter as a Whistleblower, given that a company can authorise particular staff or third parties to receive disclosures from Whistleblowers.

### **Internal Reporting (Within NobleOak)**

It is expected that any Whistleblower of NobleOak who becomes aware of known, suspected, or potential cases of Reportable Conduct may make a report under this Policy or under other applicable policies.

Sometimes, a suspicion of Reportable Conduct may arise from a misunderstanding and is not in fact Reportable Conduct; or is a matter where communication is restrained by confidentiality requirements or other legitimate reasons. Accordingly, **Whistleblowers are encouraged to check with their supervisor or manager to seek an immediate response.** Where the Whistleblower believes this is not appropriate, then an alternative reporting mechanism is available.

A Whistleblower reporting procedure is set out in the Annexure to this Policy to ensure that any report made is received by a person in a position to deal with it in an appropriate manner.

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<sup>6</sup> Paragraph 42 CPS 520

## External Whistleblowers

Where an external Whistleblower (other people with a relationship with NobleOak e.g. clients, suppliers) is reluctant to report a suspicion to the person within NobleOak with whom they ordinarily deal or to any particular person listed in the Annexure for fear of retribution, they can report their concerns to any other person listed in the Annexure, other than the person in NobleOak with whom they ordinarily deal.

## Anonymous Reporting

Anonymous reports of misconduct are accepted under this Policy. Anonymous reports have significant limitations that inhibit a proper and appropriate investigation. These limitations include the inability to provide feedback on the outcome and/or to gather additional particulars to assist the investigation. Specific protection mechanisms cannot be provided.

If the complainant wishes to make their complaint anonymously, their wish shall be honoured except insofar as it may be overridden by due process of law.

The complainant should, however, be informed that the maintenance of such anonymity may make it less likely that the alleged Breach can be substantiated in any subsequent investigation.

Where anonymity has been requested the complainant is required to maintain confidentiality regarding the issue on their own account and to refrain from discussing the matter with any unauthorised persons.

## Report to Regulator

NobleOak supports the rights of all Whistleblowers to report any Breach to the Responsible Persons nominated by this Policy and/or directly to a Regulator.

NobleOak will not constrain, impede, restrict or discourage, whether by confidentiality clauses, policies or other means, any person from disclosing information or providing documents to a Regulator about any matters referred to in this Policy.<sup>7</sup>

NobleOak consents to any person who held a Responsible Person position disclosing information or providing documents to a Regulator concerning their reasons for resignation, retirement or removal.<sup>8</sup>

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<sup>7</sup> Paragraph 53 CPS 520

<sup>8</sup> Paragraph 52 CPS 520



## Public interest disclosure and emergency disclosure

- a. **“Public Interest” disclosure** by an individual qualifies for protection if the steps are followed under the relevant Whistleblower regime. A ‘public interest disclosure’ is the disclosure of information to a journalist or a parliamentarian, where:
- at least 90 days have passed since the Whistleblower made the disclosure to ASIC, APRA or another Commonwealth body prescribed by regulation;
  - the Whistleblower does not have reasonable grounds to believe that action is being, or has been taken, in relation to their disclosure;
  - the Whistleblower 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 Whistleblower has given written notice to NobleOak that:
    - includes sufficient information to identify the previous disclosure; and
    - states that the Whistleblower intends to make a public interest disclosure.
- b. **“Emergency” disclosure** by an individual qualifies for protection if the steps are followed under the relevant Whistleblower regime. An ‘emergency disclosure’ is the disclosure of information to a journalist or parliamentarian, where:
- the Whistleblower has previously made a disclosure of the information to ASIC, APRA or another Commonwealth body prescribed by regulation;
  - the Whistleblower 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 Whistleblower has given written notice to NobleOak that:
    - includes sufficient information to identify the previous disclosure; and
    - states that the Whistleblower 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.

It is important for the Whistleblower to understand the criteria for making a public interest or emergency disclosure. A Whistleblower should contact an independent legal adviser **before** making a public interest disclosure or an emergency disclosure.

The tax law regime provides for reporting to “eligible recipients”, which include officers or senior managers, an auditor, an actuary or a person authorised by a company to receive Whistleblower disclosures.

## Reportable conduct

A person should consider the types of conduct that can be reported under each whistleblowing regime. The benefit of the regime applies to specific types of information:

Regime	Regulator	Matters
Corporations law	ASIC	<p>You must have reasonable grounds to suspect that the information you are disclosing about the company or organisation concerns:</p> <ul style="list-style-type: none"> <li>• misconduct, or</li> <li>• an improper state of affairs or circumstances.</li> </ul> <p>This information can be about the company or organisation, or an officer or employee of the company or organisation, engaging in conduct that:</p> <ul style="list-style-type: none"> <li>• breaches the Corporations Act</li> <li>• breaches other financial sector laws enforced by ASIC or APRA</li> <li>• breaches an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months, or</li> <li>• represents a danger to the public or the financial system.</li> </ul> <p>‘Reasonable grounds’ means that a reasonable person would also suspect the information indicates misconduct or a breach of the law.</p>
Tax law	ATO	<p>A tax reportable matter is:</p> <ul style="list-style-type: none"> <li>• information that may assist the ATO to perform its duties under a taxation law in relation to the entity about which the disclosure is made</li> <li>• disclosure of a matter where the person has reasonable grounds to suspect that the information they intend to provide indicates misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of the entity or an associate of the entity and the person considers the information may assist the eligible recipient to perform their duties under a taxation law in relation to the entity about which the disclosure is made.</li> </ul>

### 3. Information about the protections available to Whistleblowers, including protections under the law

#### Protection of Rights of Whistleblower

Essentially, protection is available to Whistleblowers who disclose Reportable Conduct that is serious in nature and made with reasonable grounds to believe it is true.

Protection is not available where the disclosure is:

- a. Trivial or vexatious in nature with no substance. This will be treated in the same manner as a false report and may itself constitute misconduct.
- b. An unsubstantiated allegation which is found to have been maliciously, or knowingly false. These will be viewed seriously and may be subject to disciplinary action that could result in dismissal, termination of service or cessation of a service.

A Whistleblower who makes a report under this Policy must not be subject to, or threatened with any detriment because of any notification made by them under this Policy.

NobleOak confirms its commitment to protecting and respecting the rights of Whistleblowers who report misconduct and ensuring they are not subjected to reprisals as a consequence of such action. NobleOak will not tolerate any retaliatory action or threats of retaliatory action against a Whistleblower, or against a Whistleblower's colleagues or relatives. For example, a Whistleblower must not be disadvantaged or victimised for having made the report by:

- a. dismissal or termination of services or supply,
- b. demotion,
- c. discrimination, victimisation or harassment,
- d. current or future bias, or
- e. threats of any of the above.

Any such retaliatory action or victimisation in reprisal for a disclosure made under this Policy will be treated as serious misconduct and will result in disciplinary action, which may include dismissal. In some circumstances it may be illegal; in which case NobleOak will notify police.

## **4. How NobleOak will support Whistleblowers and protect them from detriment**

### **Confidentiality**

NobleOak is committed to ensuring confidentiality in respect of all matters raised under this Policy, and takes all reasonable steps to ensure that those who make a report are treated fairly and do not suffer any disadvantage.

#### *(a) Protection of your identity and confidentiality*

Subject to compliance with legal requirements, upon receiving a report under this Policy, NobleOak will not, nor will any supervisor, manager or Risk Management Committee, disclose any particulars that would suggest or reveal a person's identity as a Whistleblower, without first obtaining their consent.

Any disclosure that the person consents to will be disclosed on a strictly confidential basis. However, the Risk Management Committee is able to disclose the complaint without the person's consent to a Regulator.

When a report is investigated it may be necessary to reveal its substance to people such as other NobleOak personnel, external persons involved in the investigation process and, in appropriate circumstances, law enforcement agencies.

It will be necessary to disclose the facts and substance of a report to a person who may be the subject of the report as it is essential for natural justice to prevail. Although confidentiality is maintained, in some circumstances, the source of the reported issue may be obvious to a person who is the subject of a report.

*(b) Protection of files and records*

NobleOak will take reasonable precautions to store any records relating to a report of misconduct securely and to restrict access to authorised persons only. Unauthorised release of information to someone not involved in the investigation, without the person's consent as a Whistleblower will be a Breach of this Policy.

Unauthorised disclosure of information relating to a disclosure that could prejudice confidentiality and identify a Whistleblower will be regarded seriously and may result in disciplinary action, which will be dealt with under NobleOaks' disciplinary procedures and may include dismissal. In some circumstances it may be illegal; in which case NobleOak will notify police.

*(c) Fairness*

Any Whistleblower who is subjected to detrimental treatment or reprisals as a result of making a report under this Policy should immediately report the matter to the CEO or Chairperson of the Board.

Detrimental treatment includes dismissal, demotion, harassment, discrimination, disciplinary action, bias, threats or other unfavourable treatment connected with making a report.

## **5. How NobleOak will investigate disclosures that qualify for protection under the law**

This section provides important information to Whistleblowers to understand how their reports and their personal information will be handled during any investigation.

### **Investigation of Report**

All reports of alleged or suspected reportable conduct made under this Policy to the Risk Management Committee will be properly assessed, and if appropriate, inquired into or independently investigated - with an objective of gathering evidence relating to the claims made by the Whistleblower. That evidence may substantiate or refute the claims made.

An investigation plan will be developed to ensure all relevant questions are addressed, the scale of the investigation is in proportion to the seriousness of the allegation(s) and sufficient resources are allocated.

Investigations must be conducted in a fair and independent manner.

On receiving a report, the person to whom the disclosure is made shall:

- a. if they believe the behaviour complained of to be unquestionably trivial or fanciful, dismiss the allegation and notify the person making the allegation of their decision;
- b. if they believe the behaviour complained of to be neither trivial nor fanciful, put in motion the investigation process.

Strict security will be maintained during the investigative process.

All information obtained will be properly secured to prevent unauthorised access.

All relevant witnesses will be interviewed and documents examined.

Contemporaneous notes of all discussions, phone calls and interviews will be made.

Where possible, interviews will be taped.

The principles of procedural fairness (natural justice) will be observed. In particular, where an adverse comment about a person is likely to be included in a report, the person affected will be given an opportunity to comment beforehand, and any comments will be considered before the report is finalised.

### **Communication of Outcome to Whistleblower**

NobleOak recognises the importance of ensuring that Whistleblowers are kept informed of the progress of any investigation undertaken as a consequence of their report, and that they are advised of the outcome of any investigation. NobleOak undertakes to keep a Whistleblower properly informed at all stages of an investigation.

## **6. How NobleOak ensures fair treatment of employees of the company who are mentioned in disclosures that qualify for protection under the law, or to whom such disclosures relate**

### **Disclosure Management**

NobleOak recognises that individuals against whom a report is made must also be supported during the handling and investigation of the report. NobleOak takes all reasonable steps to treat fairly any person who is the subject of a report, particularly during the assessment and investigation process in accordance with an established support protocol.

Where a person is identified as being suspected of possible misconduct, but preliminary inquiries determine that the suspicion is baseless or unfounded and that no formal investigation is warranted, then the Whistleblower will be informed of this outcome and the matter laid to rest.

The Governance Officer will decide whether or not the person named in the allegation should be informed that a suspicion was raised and found to be baseless upon preliminary

review. This decision will be based on a desire to preserve the integrity of a person so named, so as to enable workplace harmony to continue unfettered and to protect the Whistleblower where it is a bona fide disclosure.

Where an investigation does not substantiate the report, the fact that the investigation has been carried out, the results of the investigation and the identity of the person who is the subject of the report must be handled confidentially.

Generally, where an investigation is conducted and the Risk Management Committee believes there may be a case for an individual to respond, the Risk Management Committee must ensure that a person who is the subject of a disclosure:

- a. Is informed of the substance of the allegations;
- b. Is given a fair and reasonable opportunity to answer the allegations before the investigation is finalised;
- c. Has their response set out fairly in the investigator's report; and
- d. Is informed about the substance of any adverse conclusions in the investigator's report that affects them.

Where adverse conclusions are made in a Risk Management Committee's report about an individual, that individual has a right to respond to those conclusions prior to any action being taken by NobleOak against them.

NobleOak will give its full support to a person who is the subject of a report where the allegations contained in the report are clearly wrong.

## **Whistleblower Acting Improperly**

Personal work-related grievances

NobleOak recognises that a person may act improperly or make a report motivated by malice (this may be intentionally or unintentionally). Such action would undermine the effectiveness of this Policy, and adversely impact on genuine Whistleblowers. It is not the function of this Policy to protect persons who act improperly or with malicious intent from the consequences of such actions.

Examples of grievances that may be personal work-related grievances are:

- (a) An interpersonal conflict between the discloser and another employee;
- (b) A decision relating to the engagement, transfer or promotion of the discloser;
- (c) a decision relating to the terms and conditions of engagement of the discloser;
- (d) a decision to suspend or terminate the engagement of the discloser, or otherwise to discipline the discloser.

Making a disclosure may not protect the Whistleblower from the consequences flowing from involvement in the Reportable Conduct itself. A Whistleblower's liability for their own improper conduct will not be reduced or removed as a consequence of the Whistleblower

reporting that conduct under the terms of this Policy. However, in appropriate circumstances, an admission of improper conduct and/or active cooperation in the investigation may be considered as a mitigating factor when considering what action should be taken in response to the improper conduct in issue.

## Annexure – Whistleblower Procedure for Making a Report

- 1 Where a worker believes on reasonable grounds that any other worker has breached general law, organisational policy, or generally recognised principles of ethics, and wishes to report their concern, that worker must report their concern, in the first instance to their immediate manager or to make a risk report as outlined in the NobleOak Risk Management Guide. However, if the Whistleblower reasonably believes this would not be appropriate (e.g., where the manager is involved in the Breach) the report should be made to the Chief Risk Officer. If after making the report, the Whistleblower reasonably believes that the person to whom they have reported the Breach has failed to take action, or has failed to take appropriate action, the Whistleblower should bring the matter to the attention of the CEO or if the CEO is involved in the Breach, to the Chair of the Board.
- 2 In the case of a Director the report should be made to the Chair of the Board or where appropriate to the full Board.
- 3 In his or her report the Whistleblower should clearly state:
  - 3.1 the issue of concern;
  - 3.2 the Responsible Person or Responsible Persons involved;
  - 3.3 their reasons of belief that a Breach has occurred; and
  - 3.4 the nature and whereabouts of any further evidence that would substantiate their allegation, if known.

This is to ensure that the person accepting the report has sufficient information to take appropriate action without delay. Any such report should be in writing, dated and signed by the Whistleblower. All reports are subject to the confidentiality provisions of this Policy.

- 4 Oral reports are not encouraged but if the circumstances justify an oral report this will be accepted, but must be documented by the person accepting it to ensure appropriate records are maintained of the Breach, who was involved, the date and the action, which followed the report.

Any person reporting such a Breach should be informed that:

- a. as far as lies in NobleOak's power, the worker will not be disadvantaged for the act of making such a report; and
- b. if the complainant wishes to make their complaint anonymously, their wish shall be honoured except insofar as it may be overridden by due process of law; however,
- c. reporting such a Breach does not necessarily absolve the complainant from the consequences of any involvement on their own part in the misconduct complained of.



- 5 If the person who has accepted the report determines that it is of significance, it must be referred to the Risk Management Committee to investigate it further. Where a member of the Risk Management Committee is involved in the Breach under investigation they cannot participate in the investigation.

The Risk Management Committee will provide mentoring and other support deemed necessary by the Risk Management Committee to the Whistleblower.

- 6 The Risk Management Committee is responsible for:
  - a. coordinating an investigation into any report received from a Whistleblower, and
  - b. documenting and handling all matters in relation to the report and investigation, and
  - c. finalising all investigations, and

keeping the Whistleblower properly informed verbally or in writing as it determines appropriate, of the progress and final outcome of the investigation, and the actions taken or to be taken in response, subject to considerations of privacy of those against whom a report has been made.

- 7 Any Whistleblower who believes they have been subject to harassment or detriment as a consequence of reporting a Breach of this Policy should immediately report the same to any member of the Risk Management Committee. The Risk Management Committee will fully investigate any alleged harassment or detriment to the Whistleblower promptly and diligently. If the Risk Management Committee determines harassment or detriment has been suffered by the Whistleblower, it will take appropriate action to ensure the harassment ceases and any detriment is rectified.

Whistleblower Governance Officers must, after reasonable preliminary inquiry:

- a. Appoint a member of the Risk Management Committee to provide support to the Whistleblower (unless the Risk Management Committee member appointed is the subject of whistleblowing, in which case the Governance Officer will appoint an alternate member of the Risk Management Committee);
- b. Be satisfied that each disclosure of Reportable Conduct they received was appropriately inquired into or investigated;
- c. Be satisfied that action taken in response to the investigation is appropriate to the circumstances; and
- d. Provide governance oversight over any investigation into retaliatory action taken against the Whistleblower.

The Governance Officers are (see names and contact details in Appendix 1):

The Chief Risk Officer

The Chief Financial Officer

The Chief Executive Officer

## Appendix 1 Current officials for this Policy

### Whistleblower Governance Officers

Chief Risk Officer – Matthew Wilson [risk@nobleoak.com.au](mailto:risk@nobleoak.com.au)

Chief Financial Officer – Scott Pearson [ScottP@nobleoak.com.au](mailto:ScottP@nobleoak.com.au)

Chief Executive Officer – Anthony Brown [AnthonyB@nobleoak.com.au](mailto:AnthonyB@nobleoak.com.au)