



CLAIMCENTRAL[®]
CONSOLIDATED

Whistleblower Policy

Version 3.1

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Document Approvals

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Introduction

Claim Central Consolidated Pty Ltd and its subsidiaries (together, “CCC”) is committed to maintaining the highest level of legal, ethical and moral behaviour in governance and operational standards.

As part of that commitment, CCC values developing and fostering a culture of corporate compliance and ethical decision-making, while protecting eligible whistleblowers who make protected disclosures from suffering detriment.

Purpose

The purpose of this Whistleblower Policy (Policy) is to:

- Prevent and detect disclosable matters;
- Outline the process by which a protected disclosure may occur, including how and to whom a protected disclosure should be made;
- Outline the process by which CCC will investigate protected disclosures;
- Inform eligible whistleblowers who make protected disclosures about the protections from detriment; and
- Outline the process for fair treatment of persons to whom a protected disclosure relates or mentions.

This Policy will be provided to all employees and officers of CCC upon commencement of their employment or engagement. The Policy is also made available on the CCC intranet, Employment Hero. CCC staff are required to acknowledge having read and understood the Policy on commencement of employment.

Scope

This Policy covers disclosure of disclosable matters.

Disclosures that are not about disclosable matters do not qualify for protection under the Corporations Act 2001 (Cth) (“Corporations Act”) (or the Taxation Administration Act, where relevant). Such disclosures may be protected under other legislation, such as the Fair Work Act 2009 (Cth).

A disclosure of information by an individual will be a protected disclosure for the purposes of this Policy if the discloser is an eligible whistleblower, and:

- They have made a disclosure of information relating to a disclosable matter directly to an eligible recipient or Australian Securities & Investments Commission (“ASIC”), Australian Prudential Regulation Authority (“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; or
- They have made an emergency disclosure or public interest disclosure.

Definition of Whistleblower

An individual will be an eligible whistleblower if they are, or have been:

- An officer of CCC;
- An employee of CCC;
- A supplier of services or goods to CCC (paid or unpaid);
- An employee of a person that supplies services or goods to CCC (paid or unpaid);
- An individual who is an associate of CCC (within the meaning of the Corporations Act); or
- A relative, dependant or spouse of an individual referred to above.

Disclosable Matter

Disclosable matters are disclosures of information by an eligible whistleblower:

- a) Where the eligible whistleblower has reasonable grounds to suspect that the information concerns misconduct or an improper state of affairs or circumstances in relation to CCC or a related body corporate of CCC including, for example: illegal conduct, dishonest conduct, corruption, fraud, bribery, financial irregularities, money laundering or misappropriation of funds, and engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made, or be planning to make, a disclosure; or
- b) Where the eligible whistleblower has reasonable grounds to suspect that the information indicates that CCC, a related body corporate of CCC, or an officer or employee of CCC or a related body corporate of CCC, has engaged in conduct that:
 1. Contravenes any provisions of the Corporations Act, ASIC Act 2001, Banking Act 1959, Financial Sector (Collection of Data) Act 2001, Insurance Act 1973, Life Insurance Act 1995, National Consumer Credit Protection Act 2009, Superannuation Industry (Supervision) Act 1993 or an instrument or regulation made under any of those Acts;
 2. Contravenes any other law of the Commonwealth that is punishable by imprisonment for 12 months or more; or
 3. Represents a danger to the public or the financial system; or
- c) In relation to a disclosure about affairs of CCC or an associate of CCC (within the meaning of section 318 of the Income Tax Assessment Act 1936) (associate) relating to any tax imposed by or under, or assessed or collected under, a law administered by the Commissioner of Taxation (tax affairs) where the eligible whistleblower:
 1. Has reasonable grounds to suspect that the information indicates misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of CCC or an associate; or
 2. Considers that the information may assist the eligible recipient to perform functions or duties in relation to the tax affairs of CCC or an associate; or
- d) That is made to the Commissioner of Taxation, where the eligible whistleblower considers that the information may assist the Commissioner of Taxation to perform their functions or duties in relation to the tax affairs of CCC or an associate.

Disclosable matters include conduct that may not involve a contravention of a particular law. Information that indicates 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.

What is not a Disclosable Matter

Personal work-related grievances are not disclosable matters and are therefore not protected disclosures, except where the discloser seeks legal advice or legal representation about the operation of the whistleblower protections under the Corporations Act.

Personal work-related grievances include grievances about any matter in relation to the eligible whistleblower's employment or former employment, having (or tending to have) implications for the eligible whistleblower personally. For example, this includes, but is not limited to:

- Interpersonal conflicts;
- Decisions relating to the engagement, transfer or promotion of the eligible whistleblower;
- Decisions relating to the terms and conditions of the eligible whistleblower's engagement;
- Decisions to suspend, discipline or dismiss the eligible whistleblower; or
- Conduct (or alleged conduct) in respect of workplace bullying, harassment, sexual harassment or discrimination.

Sometimes a disclosure about one of these matters may also constitute a report about a disclosable matter, for example, if the disclosure relates to information that suggests misconduct beyond the discloser's circumstances or a more significant or systemic issue about the culture or environment of CCC.

If you have a personal work-related grievance that does not involve any disclosable matter, but would like internal assistance to resolve that grievance, then please contact your direct reporting manager or a member of the People and Advancement Team.

How to Report a Disclosable Matter

Eligible whistleblowers are encouraged to report any concerns about disclosable matters to any of the following eligible recipients:

- A senior manager or an officer of CCC which, for the avoidance of doubt, includes CCC's Group Chief Executive Officer, Group Chief Financial Officer, and General Counsel & Company Secretary;
- A CCC Whistleblower Protection Officer, which includes:
 1. Sarah Eves, Group General Counsel & Company Secretary, seves@claimcentral.com.au, +61 448 674 132;
 2. Matt Lewis, Group Chief Finance Officer, mlewis@claimcentral.com.au, + 61 422 001 522; and
 3. Lux Ramachandran, Head of Risk, Compliance & Audit, Iramachandran@claimcentral.com.au, +61 439 622 555;
- An auditor, or a member of an audit team conducting an audit;
- ASIC;
- APRA;

- A Commonwealth authority; or
- Where the eligible whistleblower is disclosing for the purpose of obtaining legal advice or legal representation in relation to the operation of relevant whistleblower legislation — a legal practitioner.

CCC has also authorised an external, independently operated service, Whispli, to receive protected disclosures. Whispli will accept contact by eligible whistleblowers on a confidential and anonymous basis via the CCC Whispli Portal at: <https://claimcentral.whispli.com/report> or scan the Quick Response (the “QR”) code which offers a link directly to the CCC Whispli Portal:



For disclosable matters relating to tax affairs, an eligible whistleblower may also make a protected disclosure to:

- a) A registered tax agent or Business Activity Statement (“BAS”) agent who provides tax agent or BAS services to CCC;
- b) Any other employee or officer of CCC who has functions or duties that relate to the tax affairs of CCC; or
- c) Where the eligible whistleblower considers that the information may assist the Commissioner of Taxation to perform their functions or duties in relation to CCC’s tax affairs – the Commissioner of Taxation.

Disclosures can be made anonymously and still be protected under the Corporations Act.

Submit a Report

To submit a report of a disclosable matter, an eligible whistleblower can:

- a) Complete a report accessible through the CCC Whispli Portal at <https://claimcentral.whispli.com/report>, which is available to internal and external parties; and/or
- b) Report the matter to a Whistleblower Protection Officer by phone, email or letter.

Eligible whistleblowers are encouraged to clearly communicate that they are making a disclosure of a disclosable matter and to provide as much information as possible, including any known details related to the disclosable matter and the steps (if any) that have been taken to disclose the matter elsewhere in an attempt to resolve the concern.

Eligible whistleblowers are not expected to investigate their concerns or provide details of their validity prior to disclosing a disclosable matter.

A disclosable matter may be reported anonymously, confidentially, securely and outside of business hours.

An eligible whistleblower can make an anonymous report through the CCC Whispli Portal at <https://claimcentral.whispli.com/report> by choosing to remain anonymous or sending an anonymous written report directly to a Whistleblower Protection Officer.

Handling and Investigating a Disclosure

If an eligible whistleblower reports a disclosable matter to an eligible recipient, the following process will apply:

- a) The eligible recipient will notify a Whistleblower Protection Officer as soon as reasonably possible;
- b) If the eligible whistleblower can be contacted, the Whistleblower Protection Officer will acknowledge the disclosure within a reasonable period after the disclosure is received;
- c) The Whistleblower Protection Officer will determine whether further investigation is appropriate;
- d) If it is determined that there is insufficient information or evidence to warrant further investigation, the eligible whistleblower will be informed at the earliest possible opportunity (if the disclosure was not confidential), and no further action will be taken;
- e) If it is determined that further investigation is appropriate, the matters will be referred by the Whistleblower Protection Officer to an individual that is a specialist with appropriate knowledge and objectivity to investigate (Whistleblower Investigation Officer), and the following will occur:
 1. If the eligible whistleblower can be contacted the Whistleblower Investigation Officer will contact the eligible whistleblower as soon as practicable:
 - To acknowledge receipt of the disclosure;
 - To discuss the eligible whistleblower's welfare; and
 - To establish a process, including expected timeframes, for reporting to the eligible whistleblower on the progress of dealing with the disclosure;
 2. The Whistleblower Investigation Officer will undertake a formal investigation as soon as practicable that is objective, fair, thorough, confidential and without bias. Investigations will be independent of the business unit in which allegations have been made, the eligible whistleblower, or any person who is the subject of the disclosable matter; and
 3. The Whistleblower Investigation Officer will advise the eligible whistleblower of the final outcome of the investigation, where appropriate and possible.

Where investigations substantiate an allegation arising from the disclosure of a disclosable matter, the matter will be dealt with in accordance with established administrative or disciplinary procedures, which may result in disciplinary action, including termination of employment or engagement, and matters may be referred to external parties where appropriate (e.g. in matters that may involve criminal behaviour)

CCC will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

Emergency and Public Interest Disclosure

This section (10) does not apply to disclosable matters that relate to tax affairs.

An emergency disclosure may be made under the following circumstances:

- a) An eligible whistleblower may make an emergency disclosure to a member of Parliament or a journalist where:
 - They have already made a protected disclosure to ASIC, APRA or a Commonwealth authority; and
 - They have reasonable grounds to believe that the information disclosed concerns a substantial and imminent danger to the health or safety of either: one or more persons; or to the natural environment; and
 - They have notified the entity to which they made the protected disclosure that they intend to make an emergency disclosure; and
 - The extent of the information disclosed in the emergency disclosure is no greater than necessary to inform the recipient of the substantial and imminent danger.
- b) Disclosers should contact an independent legal adviser before making an emergency disclosure.

A public interest disclosure may be made under the following circumstances:

- a) An eligible whistleblower may make a public interest disclosure to a member of Parliament or a journalist where:
 - They have already made a protected disclosure to ASIC, APRA or a Commonwealth authority;
 - At least 90 days has passed since the protected disclosure;
 - They do not have reasonable grounds to believe that action is being or has been taken to address the matters to which the protected disclosure related;
 - They have reasonable grounds to believe that making the public interest disclosure would be in the public interest;
 - After the 90 period, they have notified the entity to which they made the protected disclosure that they intend to make a public interest disclosure; and
 - The extent of the information disclosed in the public interest disclosure is no greater than necessary to inform the recipient of the disclosable matters.
- b) A discloser should contact an independent legal adviser before making a public interest disclosure.

Protection for Eligible Whistleblowers

- a) General matters relating to protection
 - This Policy sets out the protections under the Corporations Act that are available to disclosers who qualify for protection as a whistleblower.
 - Protections apply not only to internal disclosures, but to disclosures to legal practitioners, regulatory and other external bodies, and public interest and emergency disclosures that are made in accordance with the Corporations Act.
 - Eligible whistleblowers can still qualify for protection even if their disclosure turns out to be incorrect.

b) Protection of identity

An eligible whistleblower who makes a protected disclosure is not required to identify themselves to CCC or anyone else to be protected under this Policy or the law. Eligible whistleblowers can choose to remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised. Eligible whistleblowers can refuse to answer questions that they feel could reveal their identity at any time, including during follow-up conversations. An eligible whistleblower who wishes to remain anonymous should maintain ongoing two-way communication with CCC, so CCC can ask follow-up questions or provide feedback.

If a person obtains information as a result of a protected disclosure that identifies or is likely to identify the eligible whistleblower, that person must not disclose that information to any person except:

- With the eligible whistleblower's consent;
- To a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of relevant whistleblower protection legislation;
- To ASIC, APRA or the Australian Federal Police ("AFP");
- If the protected disclosure relates to tax affairs – to the Commissioner of Taxation; or
- To any government authority for the purpose of assisting the authority in the performance of its functions or duties, as long as it has also been disclosed to ASIC, APRA or the AFP (or, if the protected disclosure relates to tax affairs, the Commissioner of Taxation).

A person may disclose information (other than the actual identity of the eligible whistleblower) if reasonably necessary for the purposes of investigating a matter that is relevant to the protected disclosure and if the person takes all reasonable steps to reduce the risk that the eligible whistleblower will be identified as a result.

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 the exceptions set out in this Policy.

c) Protection from certain liability

An eligible whistleblower will not be subject to any civil, criminal or administrative liability for making a protected disclosure.

However, this does not prevent an eligible whistleblower from being subject to any civil, criminal or administrative liability for the conduct of the eligible whistleblower revealed by the protected disclosure. Protections do not grant immunity for any misconduct a discloser has engaged in that is revealed in their disclosure.

CCC will not exercise any contractual right, or seek any contractual remedy, against an eligible whistleblower on the basis that the eligible whistleblower made the protected disclosure, including termination of employment.

If the protected disclosure is made to the Commissioner of Taxation or is a public interest disclosure or an emergency disclosure, the information contained in the protected disclosure is not admissible in evidence against the person in criminal proceedings or in proceedings for the imposition of a penalty.

d) Protection from detriment

An eligible whistleblower must not suffer detriment or be otherwise disadvantaged in reprisal for making a protected disclosure.

Specifically, no one may cause or threaten to cause detriment to another person because they believe or suspect that any person may have made, proposes to make, or could make a protected disclosure.

Detriment includes (but is not limited to):

- Dismissal of an employee;
 - Injury of an employee in their employment;
 - Alteration of an employee's position or duties to their disadvantage;
 - Discrimination between an employee and other employees;
 - Harassment or intimidation of a person;
 - Harm or injury to a person, including psychological harm;
 - Damage to a person's property;
 - Damage to a person's reputation;
 - Damage to a person's business or financial position; and
 - Any other damage to a person.
- e) Compensation

Eligible whistleblowers (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 protected disclosure; or
- CCC failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

Malicious Disclosures

This Policy provides employees and officers of CCC with an avenue to raise legitimate and serious concerns about disclosable matters. It is unacceptable for CCC employees and officers to make malicious or false disclosures or knowingly provide false or misleading information regarding a disclosure. The making of a malicious or false disclosure or the provision of knowingly false or misleading information may be subject to disciplinary action up to and including termination of employment.

Training

CCC will carry out training for CCC employees to educate them on their rights and obligations under this Policy and applicable whistleblower legislation. CCC will carry out separate training for eligible recipients within CCC on how to respond to disclosable matters.

Reporting

CCC Whistleblower Protection Officers will report to the CCC Audit, Risk and Compliance Committee (the “ARCC”) on the number and type of whistleblower reports quarterly to enable CCC to address any issues and trends at a subsidiary and/or Group level.

These reports will be made on a ‘no names’ basis, maintaining the confidentiality of matters raised under this Policy.

The ARCC will receive copies of all whistleblower reports and whistleblower reports from Whistleblower Protection Officers (as appropriate). In addition, any serious allegations will be considered by the Whistleblower Protection Officers for immediate referral to the Board.

Responsibilities

CCC Board are ultimately responsible for ensuring the Policy operates efficiently and complies with applicable legislation. At least annually, CCC’s Board will review, discuss, and approve this Policy.