

# Credit Corp Group

## Whistleblower Policy - Australia

## **Table of Contents**

<b>1. Document Control Form.....</b>	<b>3</b>
1.1 Document Details.....	3
1.2 Document Authorisation .....	3
1.3 Document History .....	3
<b>2. Introduction .....</b>	<b>4</b>
2.1 Purpose .....	4
2.2 Scope .....	4
2.3 Applicable Laws and Regulations .....	4
2.4 Audience.....	4
<b>3. Policy.....</b>	<b>5</b>
3.1 Guiding principles .....	5
3.2 What is a Whistleblower? .....	5
3.3 Disclosures Qualifying for Protection .....	5
3.4 Disclosures That Do Not Qualify for Protection.....	6
3.5 Who is an Officer or Senior Manager of Credit Corp? .....	6
3.6 Internal Reporting .....	6
3.7 Anonymity.....	6
3.8 Disclosure of Identity .....	7
3.9 Securing Records.....	7
3.10 Arrangements for Meetings with Whistleblowers.....	7
3.11 Breaches Relating to the Disclosure of Identity .....	8
3.12 Protection from Detriment .....	8
3.13 Protection from Civil, Criminal and Administrative Liability .....	9
3.14 Personal Work-Related Grievances .....	9
3.15 Media Disclosures .....	10
3.16 False, Frivolous or Vexatious Reports .....	10
<b>4. Procedure.....</b>	<b>11</b>
4.1 Procedure for Reporting .....	11
4.2 Methods of Reporting.....	11
4.3 Whistleblower Protection Officer .....	12
4.4 What to Expect During and after the Investigation.....	13
4.5 Reporting to the Board.....	13
<b>5. Review .....</b>	<b>13</b>

## 1. Document Control Form

### 1.1 Document Details

<b>Document Title</b>	Whistleblower Policy - Australia
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### 1.2 Document Authorisation

Name	Position	Signature	Date
Credit Corp Group Limited	Board	By resolution	20 March 2025

### 1.3 Document History

Version	Release	Date	Author	Description
1.0	Superseded	3 December 2019	A Carpenter	Superseded
1.1	Superseded	17 October 2022	A Carpenter	Superseded
2.0	Superseded	20 March 2025	A Carpenter	Superseded
2.1	Final	23 May 2025	A Carpenter	Final

## 2. Introduction

### 2.1 Purpose

This document is the whistleblowing policy of Credit Corp Group Limited and its subsidiaries ('Credit Corp') relating to its operations in Australia.

It details the process for making whistleblowing disclosures to Credit Corp, how disclosures will be investigated and the various protections that apply to whistleblowers.

This policy provides general guidance only and is not intended to be relied on as legal advice. Disclosers and recipients are encouraged to seek their own independent legal advice.

This policy shall be published and made available to officers and employees on the QMS section of the company intranet. A copy may also be obtained by contacting Credit Corp's Human Resources department at [hr@creditcorp.com.au](mailto:hr@creditcorp.com.au).

### 2.2 Scope

<b><i>What this policy covers</i></b>	<b><i>What this policy does not cover</i></b>
<ul style="list-style-type: none"> <li>• What is a whistleblower disclosure</li> <li>• Who can make a disclosure</li> <li>• Confidentiality of Whistleblower's identity</li> <li>• Protection for whistleblowers</li> <li>• What to expect when making a whistleblower disclosure</li> </ul>	<ul style="list-style-type: none"> <li>• Personal work-related grievances – refer to the Workplace Grievances Procedure in the Employee Handbook</li> <li>• Customer complaints – refer to the Complaints Handling Policy &amp; Procedure</li> <li>• Whistleblower Policy for suppliers/contractors (see separate policy)</li> </ul>

### 2.3 Applicable Laws and Regulations

- *Corporations Act 2001 (Cth)*
- *Taxation Administration Act 1953 (Cth)*.

### 2.4 Audience

This policy applies to current and former employees, volunteers, secondees, homeworkers, contractors, suppliers, officers and board members located in Australia (whether paid or unpaid) of Credit Corp.

## 3. Policy

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### 3.1 Guiding principles

Credit Corp is committed to the highest standards of conduct and ethical behaviour. We believe that by promoting an open, honest and transparent workplace, where compliance and fair dealing is central to all that we do, we have built stronger relationships with all our stakeholders including our clients, customers, investors, employees and regulators.

To support our company values of Discipline, Accountability and Transparency, Credit Corp maintains regular and open dialogue with its employees, encouraging them to speak up if they have any concerns about suspected or actual wrongdoing and ensures that employees who report their concerns are supported and protected from detriment.

While we encourage employees to raise concerns internally, nothing in this policy is intended to prevent any person from reporting suspected misconduct to an appropriate regulator or enforcement authority. To the extent of any inconsistency between this policy and any contractual obligation of confidentiality, or any other Credit Corp policy, this policy prevails. To the extent that this policy is inconsistent with the law, the law prevails.

### 3.2 What is a Whistleblower?

A whistleblower is a person who reports actual or suspected wrongdoing to someone who is eligible to receive reports about those matters, such as an officer or senior manager of Credit Corp as defined in this policy, or the appropriate person or authority.

Whistleblowers who report those matters are given certain rights and protections to ensure that they do not suffer detriment due to having reported, having been in a position to report, or having intended to report, such matters.

All employees are protected by whistleblower legislation when making a whistleblower report, and these protections also extend to their relatives, spouses and dependents.

### 3.3 Disclosures Qualifying for Protection

To receive protection as a whistleblower, the disclosure must be about certain matters. Disclosures qualify for protection where the whistleblower has reasonable grounds to suspect that the information being disclosed concerns:

- misconduct or an improper state of affairs, including Credit Corp or an officer or employee of Credit Corp, having committed an offence under the *National Consumer Credit Protection Act 2009*, the *ASIC Act 2001*, the *Corporations Act 2001* or various other financial services laws<sup>1</sup>;
- an offence against any other Commonwealth law that is punishable by imprisonment for a period of 12 months or more;
- information that indicates a significant risk to public safety or the stability of, or confidence in, the financial system, even if not explicitly related to a breach of the law; or
- misconduct or an improper state of affairs or circumstances, in relation to Credit Corp's tax affairs.

To qualify for protection, the disclosure must be made to the appropriate person or authority, this includes:

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<sup>1</sup> Including the *Banking Act 1959*, the *Financial Sector (Collection of Data) Act 2001*, the *Insurance Act 1973*, the *Life Insurance Act 1995*, the *Superannuation Industry (Supervision) Act 2009*, and any instrument made under these acts.

- an Officer or Senior Manager of Credit Corp Group or its related entities;
- a person conducting an audit of Credit Corp or its related entities;
- an actuary employed by Credit Corp;
- any person authorised by Credit Corp to receive disclosures;
- a solicitor (for the purpose of obtaining legal advice);
- the appropriate regulator<sup>2</sup>; or
- as it relates to disclosures regarding alleged misconduct or improper conduct related to Credit Corp's tax affairs, to the Commissioner of Taxation (ATO), the Tax Practitioners Board; the Inspector-General of Taxation, prescribed entities to which the discloser is a member<sup>3</sup>; registered tax or BAS agents, auditors, a medical practitioner or psychologist for the purpose of obtaining medical or psychiatric care, treatment or counselling, and certain other prescribed eligible recipients.<sup>4</sup>

### 3.4 Disclosures That Do Not Qualify for Protection

Where a disclosure does not qualify for protection in line with the above parameters, employees should still consider escalating it to Credit Corp outside of the whistleblower policy, for example, to an appropriate manager, through the risk inbox incident reporting process, or the employee grievance process as relevant.

### 3.5 Who is an Officer or Senior Manager of Credit Corp?

Credit Corp deems the following positions to be senior managers for the purpose of whistleblower disclosures:

- Chief Executive Officer;
- Chief Operating Officer – Australia and New Zealand;
- Chief Financial Officer;
- Chief People Officer (Whistleblower Protection Officer) and
- Head of Legal and Compliance.

Credit Corp deems the following positions to be officers for the purpose of whistleblower disclosures:

- Company Directors;
- Company Secretary.

### 3.6 Internal Reporting

We encourage employees to raise concerns internally in the first instance, however nothing in this policy is intended to discourage any person from reporting suspected misconduct to the appropriate regulator or law enforcement agency.

### 3.7 Anonymity

A whistleblower is not required to identify themselves when making a disclosure or relying on the protections under this policy or the law. A whistleblower may advise that they wish to remain anonymous, or, if disclosing their identity, place restrictions on who is informed of their identity. A whistleblower may also refuse to answer questions that they feel could reveal their identity at any time, including during follow-up conversations.

To support anonymity, Credit Corp has engaged the services of a third-party provider, 'Your Call Whistleblowing Solutions' ("Your Call") for the purpose of accepting whistleblower disclosures. For more information, refer to section 4.2.

<sup>2</sup> Including, as it relates to Credit Corp, the Australian Securities and Investments Commission, the Australian Tax Office and any other Commonwealth authority prescribed by the *Corporations Act 2001*

<sup>3</sup> No entities have been prescribed at the time of publication of this policy; however entities that may be prescribed in the future include relevant professional associations.

<sup>4</sup> For more information, refer to s14ZZV the *Taxation Administration Act 1953* (Cth)

### 3.8 Disclosure of Identity

When Credit Corp or its relevant officers or employees receive a whistleblower disclosure that qualifies for protection, the whistleblower's identity, and any information that is likely to lead to their identification, will be treated as strictly confidential and will not be disclosed.

However, information about the whistleblower's identity, or information that could lead to their identification may be disclosed where:

- a) the whistleblower provides consent for this information to be disclosed;
- b) Credit Corp or the recipient is required to disclose it by law, or
- c) The disclosure is being made to ASIC, APRA, the Australian Federal Police, the ATO, or to a solicitor for the purpose of obtaining legal advice or legal representation in relation to the whistleblower disclosure.

In addition to the above, in certain cases, it may be reasonably necessary for the purpose of investigating the conduct, to disclose information (other than the identity of the discloser), which may lead to the discloser being identified, but only where the recipient of the information has taken all reasonable steps to reduce the risk that the discloser will be identified.

The below example shows how the rules may operate in practical effect:

The Chief People Officer for XYZ Corporation receives a whistleblower disclosure from a former employee in relation to an alleged breach of the Corporations Act.

For the issue to be effectively investigated, details of the allegation must be shared with certain Senior Managers, including the Chief Executive Officer and Chief Financial Officer. As the former employee did not consent to the disclosure of their identity, the Chief People Officer shares only the information in relation to the alleged breach and does not disclose information of the whistleblower's identity, or any information that is likely to lead to the identification of the whistleblower.

As certain supporting information provided by the whistleblower to the Chief People Officer made reference to the whistleblower's location of work, employment position, supervisor's name, gender, age and shift roster, and such details were not materially relevant to the investigation of the allegation, the Chief People Officer took steps to permanently redact this information when passing it on for investigation, as part of the reasonable steps to prevent the whistleblower from being identified.

These actions complied with the Whistleblower legislation, as the disclosure of the information was reasonably necessary to investigate the conduct issue and although the information that was disclosed could lead to the whistleblower being identified, the whistleblower's identity was not disclosed and all reasonable steps were taken to prevent the whistleblower from being identified.

### 3.9 Securing Records

All records and documents relating to whistleblower disclosures will be stored in an access restricted drive, and only visible to the recipient of the disclosure. Where it is necessary to share documents during the investigation, and where the discloser wishes to remain anonymous, those documents will be redacted to protect the discloser's identity.

### 3.10 Arrangements for Meetings with Whistleblowers

Where a whistleblower disclosure is made on an identified basis, it may be appropriate to meet with the whistleblower during the investigation of the matter. The recipient of the protected disclosure should consider

the location of any meeting with the whistleblower, to help mitigate the risk that the whistleblower's identity will become known, and to make them feel at ease. Where relevant, an offsite meeting should be arranged in a private venue, for example, in the office of our legal representative.

The recipient may also recommend that the discloser access the Your Call whistleblowing platform to enable ongoing communication and exchange of information, which may avoid the need for face-to-face meetings. For more information see section 4.2.

### **3.11 Breaches Relating to the Disclosure of Identity**

It is a breach of Credit Corp's policy and the law, to disclose a whistleblower's identity against their wishes, or to disclose information which may lead to a whistleblower being identified, without having taken all reasonable steps to prevent the whistleblower from being identified.

Any breach of confidentiality relating to a disclosure of the whistleblower's identity will be taken seriously and will be the subject of a separate investigation. Any person found to have breached confidentiality will be subject to disciplinary action, which may include the termination of their employment. This is an important measure to ensure that employees feel comfortable in escalating any concerns.

There are also significant penalties under legislation for disclosing a whistleblower's identity, or disclosing information which may lead to a whistleblower being identified without having taken all reasonable steps to prevent the whistleblower from being identified. Contraventions are punishable by up to 6 months' imprisonment and the penalties for disclosing a whistleblower's identity or victimising a whistleblower are severe. For individuals, the penalty is up to 5000 penalty units (currently \$1.05million) and for companies, 50,000 penalty units (currently \$10.5 million) or up to 10% of annual turnover (to a maximum of \$525 million or 2.5 million penalty units). Civil liability in respect to damages may also apply.

A whistleblower may make a complaint about disclosure of their identity through the same channels available for making whistleblower disclosures.

### **3.12 Protection from Detriment**

For Credit Corp's whistleblower policy to be successful and to ensure that we can identify, investigate and respond to any actual or suspected wrongdoing, whistleblowers must feel safe and confident in coming forward to report issues.

To support this, and to comply with its obligations under the law, Credit Corp will not tolerate any conduct that may cause detriment to the whistleblower or to any other person, in the belief, or suspicion, that a person has made, may make, proposes to make, or could make a whistleblower disclosure.

For these protections to apply, there is no requirement for the disclosure to have actually been made, and the person causing detriment does not need to intend that their conduct causes the detriment.

In particular, no officer or employee of Credit Corp may cause or threaten to cause:

- dismissal of an employee;
- injury of an employee in his or her employment;
- alteration of an employee's position or duties to his or her disadvantage;
- discrimination between an employee and other employees of the same employer;
- 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; or

- any other damage to a person

due to a suspicion that a person has made, may make, proposes to make, or could make a whistleblower disclosure.

Any person found to have engaged in conduct that contravenes this section will be subject to disciplinary action, which may include the termination of their employment.

The foregoing does not restrict administrative or management action reasonably necessary 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 area to prevent them from detriment, or genuinely managing a discloser's unsatisfactory work performance, if the action is in line with Credit Corp's performance management framework.

There are significant penalties for breaches set out in this section under whistleblower legislation, including large fines and imprisonment for individuals found to have contravened the law. Civil liability in respect of damages may also apply. Whistleblowers may be eligible for compensation or seek other remedies through the court if they suffer loss, damage or injury because of a disclosure, and Credit Corp failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

A whistleblower may seek independent legal advice or contact regulatory bodies such as ASIC, APRA or the ATO if they believe they have suffered detriment relating to whistleblowing.

### 3.13 Protection from Civil, Criminal and Administrative Liability

Where a protected whistleblower disclosure is made in line with this policy, the whistleblower is protected from the following in relation to their disclosure:

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

This is to ensure that whistleblowers feel comfortable in making disclosures, without fear of liability. It is important to note, however, that such protections apply only to the disclosure itself and do not protect whistleblowers in relation to any unlawful or improper conduct that they may have engaged in.

### 3.14 Personal Work-Related Grievances

Not all disclosures are protected whistleblower disclosures under the legislation. A disclosure of a personal work-related grievance, outside of narrow circumstances, is unlikely to qualify for protection under the whistleblower legislation.<sup>5</sup>

However a disclosure would be protected if it:

- has significant implications for the regulated entity to which it relates, or another regulated entity, that do not relate to the discloser;

<sup>5</sup> An example of a personal, work-related grievance that is unlikely to be covered under whistleblower protections is when an employee complains about being denied a promotion, even though a project they delivered was more successful than that of the colleague who was promoted. While the employee may perceive the decision as unfair, such grievances generally relate to individual dissatisfaction with employment decisions and do not involve the kind of disclosure that whistleblower protections are designed to address.

- concerns conduct, or alleged conduct, in contravention of specified corporations and financial services laws, or that constitutes an offence punishable by 12 months or more imprisonment under any other commonwealth laws;
- concerns conduct that represents a danger to the public or the financial system; or
- concerns conduct prescribed by the regulations (if any).

Other circumstances where a work-related grievance would be protected are where it relates to detriment or victimisation to the discloser in contravention of the whistleblower legislation.

Employees are also protected where they make a disclosure to a solicitor for the purpose of obtaining legal advice or legal representation in relation to the operation of the whistleblower legislation.

### 3.15 Media Disclosures

A disclosure to a journalist or parliamentarian may attract whistleblower protections in limited circumstances. This may be the case where a disclosure meets all the following criteria, referred to as “Public Interest Disclosures”:

- the whistleblower first makes a whistleblower disclosure to the regulator;
- at least 90 days have passed since the previous disclosure was made;
- the whistleblower does not have reasonable grounds to believe that action is being, or has been, taken to address the matters relating to the previous disclosures;
- the whistleblower has reasonable grounds to believe that making a further disclosure of the information would be in the public interest;
- after 90 days have elapsed after the previous disclosure, the whistleblower makes a written notification to the recipient of the previous disclosure that the whistleblower intends to make a public interest disclosure and includes sufficient information to identify the previous disclosure; and
- the disclosure to the journalist or parliamentarian is no greater than is necessary to inform the recipient of the breach.

An “Emergency Disclosure” may also be made to a journalist or a parliamentarian if 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. There is no waiting requirement in the case of an emergency disclosure, although the whistleblower must still have made a previous disclosure and also given prior written notification to the recipient of the previous disclosure.

It is recommended that a discloser seeks independent legal advice before making a public interest or emergency disclosure.

### 3.16 False, Frivolous or Vexatious Reports

Credit Corp will investigate all Whistleblowers fairly and with impartiality. Where it has been established that a whistleblower has made a false report in relation to the alleged conduct, including where the allegation has been made frivolously, vexatiously and without any reasonable basis, that person may be subject to disciplinary proceedings, which may include the termination of their employment.

Protections against adverse cost orders in damages claims under the Corporations Act may not apply to a whistleblower who acts vexatiously or without reasonable cause.

This should not discourage genuine whistleblowers from reporting matters of genuine concern. A disclosure will not be considered false, frivolous or vexatious simply because an investigation does not find that the allegations are substantiated.

## 4. Procedure

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### 4.1 Procedure for Reporting

Upon receipt of a disclosure, Credit Corp will assess the disclosure to determine whether it qualifies for protection; and whether a formal in-depth investigation is required.

Where it is determined that a formal in-depth investigation is required, all such matters will be robustly investigated and responded to, however there may be practical constraints in circumstances where the whistleblower chose to remain anonymous. How the matter is investigated and who conducts the investigation will depend on the nature of the matter and whether the whistleblower has consented to their identity being shared.

All whistleblower disclosures must be preliminarily reviewed by the eligible recipient within 24 hours. The timeframes for concluding an investigation will vary depending on the circumstances, including the complexity of the matter, the extent of the issue, and the availability of information. Where practicable, a preliminary investigation will be completed within 30 days.

Upon receipt of a whistleblower disclosure, the recipient will elect an appropriate independent senior employee to investigate the disclosure. The person selected to investigate the matter must not be subject to any of the allegations, and must be more senior than the person who is the subject of the complaint, and where appropriate may be external to the Company.

In the event that a whistleblower disclosure is received in relation to the Chief Executive Officer or Chair of the Board, the matter will be escalated to the Chair of the Audit and Risk Committee for investigation or to appoint an external investigator.

In the event that a whistleblower disclosure is received in relation to any member of the Credit Corp Group board of directors, the matter will be investigated by the Chair of the Board or delegate.

The subject of a whistleblower investigation must not contact the whistleblower in relation to the disclosure or the conduct that the disclosure relates to.

Credit Corp has put in place the Your Call platform to receive disclosures. Workflows in the Your Call Platform will direct the disclosure to the appropriate recipient, depending on who the disclosure relates to. For more information relating to the Your Call platform refer to section 4.2.

### 4.2 Methods of Reporting

There is no prescribed format a whistleblower must use when making a report to an eligible recipient.

To support accessibility, Credit Corp has engaged the services of Your Call, an external intermediary service, acting as a conduit between whistleblowers and Credit Corp. The solution includes an online platform, accessible 24/7, and a tollfree hotline which can be contacted between the hours of 7am and midnight Australian Eastern Standard Time. Disclosures can be made on an identified or anonymous basis. A whistleblower can also identify themselves to Your Call while requesting that Credit Corp not be informed of their identity, or place restrictions on who their identity is shared with.

The platform supports continued communication between the whistleblower and Credit Corp, allowing anonymity while allowing Credit Corp to communicate with the whistleblower to ask follow-up questions,

clarify information or provide updates. The contact details for Your Call are<sup>6</sup>:

Website: <https://creditcorp.relyplatform.com/f/IDVED97>

Phone: 1300 790 228 (Australia)

More information on the Your Call service can be found on the company intranet.

Disclosures to Credit Corp can also be made on an anonymous basis in writing to an Officer or Senior Manager of Credit Corp at the following address:

Credit Corp Group Limited  
GPO Box 4475  
Sydney, NSW 2001

To assist the recipient in identifying the disclosure as one which relates to whistleblowing, we ask disclosers to clearly label the disclosure, "Whistleblower Disclosure".

### 4.3 Whistleblower Protection Officer

Where a whistleblower has provided consent for their identity to be shared, the officer or senior manager receiving the report may elect to contact the Chief People Officer or their delegate to engage them in their capacity as the Whistleblower Protection Officer ('WPO'). Note that the WPO may not be the investigator of the whistleblower disclosure.

The WPO will assess the risk of detriment against a whistleblower and other persons (e.g. other staff who might be suspected to have made a disclosure) within 24 hours of being informed of the disclosure.

The role of the WPO is to assist in protecting the whistleblower and other applicable employees and their wellbeing. Where a disclosure has been made on an anonymous basis through the Your Call platform, the WPO will also reach out to the whistleblower to offer support.

The Whistleblower Protection Officer will:

- remain in contact with the whistleblower (where possible) throughout the course of the investigation and, as necessary, thereafter;
- consider any complaint in relation to conduct that contravenes our policy or the law, such as conduct that may threaten or result in detriment as a result of the disclosure;
- consider any arrangements required to support the whistleblower, such as offering to move the whistleblower or other staff members to a different team, location, or function where practicable;
- arrange any appropriate support, including through the employee assistance program, counselling services or other professional and legal services;
- support the whistleblower with strategies to help them minimise and manage stress, time or performance impacts, or other challenges resulting from the disclosure or its investigation;
- support other initiatives such as allowing the disclosure to take extended leave, or provide retraining to allow them to move into a different role or function where appropriate; and
- consider any other appropriate support that may be available to the whistleblower.

The WPO will also consider any arrangements required to support the person who is the subject of the whistleblower complaint during the investigation to ensure fair treatment, recognising that the person against whom the allegations are made must be given procedural fairness and a right of reply, and that an investigation may be a stressful process for the subject of the complaint, particularly where the allegation is

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<sup>6</sup> The service can also be contacted from the USA on 1800 897-2761, New Zealand on 0800 123 508 and the Philippines on 1800 1 322 0591

later found not to have been substantiated.

#### 4.4 What to Expect During and after the Investigation

During the investigation, it may become necessary to contact the whistleblower to obtain further information. Any information that the whistleblower is able to share in relation to the alleged breach will assist the investigation.

Where a whistleblower disclosure is received on an identified basis, or through a channel that supports two-way communication, the investigator or WPO will provide regular updates to the whistleblower to the extent appropriate. The regularity of these updates will depend on the individual circumstance, however, should generally not be less frequent than every 14 days during the investigation period.

Upon completion of the investigation, the person investigating the matter will report their findings of the allegations to the CEO, or the board if the allegations relate to the CEO. The findings may be that:

- the allegation has been substantiated in part or in full;
- the allegations have not been substantiated;
- the allegations have been disproven.

At the conclusion of the investigation, and maintaining appropriate confidentiality of the whistleblower's identity, the CEO will be consulted in relation to any remedial actions to be taken. Any finding of criminal activity will be reported to the Police and/or regulators as required by law<sup>7</sup>.

Subject to any confidentiality restrictions, the investigator will also inform the manager of the subject of the allegations and of any findings that relate to that person.

To the extent appropriate, the whistleblower will be informed of the outcome of the investigation, unless they have chosen to remain anonymous or have not used a reporting method which allows two-way communication.

In circumstances where the whistleblower raises dissatisfaction in relation to the outcome of the investigation, the matter may be escalated to the CEO or Chair of the Audit and Risk Committee as applicable, for response.

#### 4.5 Reporting to the Board

Credit Corp's Chief People Officer or their delegate will report to Credit Corp Group's board at least annually in relation to any matters that arise from its Whistleblower Policy, or more frequently as is necessary in circumstances where any serious conduct issue has been raised.

### 5. Review

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This policy will be reviewed annually, unless organisational and/or legislative changes require more frequent modifications, and will be approved by the Credit Corp Group Limited Board.

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<sup>7</sup> Credit Corp has obligations under the breach reporting regime to report misconduct or investigations into misconduct that exceed 30 days. For more information, refer to the Credit Corp Group Breach Reporting Policy.