



Whistleblower Policy

Liberty Financial Group Limited (ABN 59 125 611 574)

1. Background and Purpose

- 1.1 Liberty Financial Group Limited and its related bodies corporate (**Liberty Group**) is committed to the highest standards of professionalism, honesty and ethical behaviour in all our business activities.
- 1.2 We encourage the reporting of any instances of suspected unethical, illegal, fraudulent or undesirable conduct involving any business within the Liberty Group.
- 1.3 The purpose of this policy is to:
- (a) encourage you to report any concerns;
 - (b) know how and where to report those concerns;
 - (c) be aware of what will happen when you report those concerns (including the protections you are entitled to); and
 - (d) ensure that you feel safe in reporting your concerns.
- 1.4 This policy will be made available on the intranet.

2. Scope of the Policy

Who can make a report?

- 2.1 In Australia, the following people can make a report under this policy:
- (a) a current or former staff member of the Liberty Group;
 - (b) an officer or former officer of the Liberty Group;
 - (c) a person who is (or was) a provider of goods and services to the Liberty Group;
 - (d) a broker or introducer to the Liberty Group; or
- a relative or family member of any of the individuals above.
- 2.2 In New Zealand, the following people can make a report under this policy:
- (a) a current or former staff member of the Liberty Group;
 - (b) an individual concerned in the management of the Liberty Group, including a director;
 - (c) a secondee to the Liberty Group; or
 - (d) a supplier of services to MSD (whether paid or unpaid).
- 2.3 An individual specified in clause 2.1 or 2.2 is referred to as an "**Eligible Person**" under this policy.

What is a reportable matter?

2.4 Examples of what might constitute a reportable matter include:

- (a) Corruption or bribery;
- (b) Dishonesty or fraud;
- (c) Unsafe work practices;
- (d) Illegal or unethical activities
- (e) a breach of Liberty Group's policies or procedures;
- (f) any act that could cause financial or reputation loss; or
- (g) a matter specified in Appendix B.

What matters are not reportable?

2.5 While we encourage you to use this policy and report any concerns that you may have, not all concerns are covered by this policy. For example, a personal work-related grievance that may have implications for that person personally, but do not have broader implications for the Liberty Group. This would include an interpersonal conflict between staff members, or a decision about the engagement, transfer or promotion of a staff member.

2.6 In some cases, a personal work-related grievance may have a significant implication for the Liberty Group (for example, a systemic payroll problem). If this is determined to be the case, your report will be considered in accordance with this policy.

2.7 Personal work-related grievances should be raised directly with a Team Leader or Manager (outside of your direct reporting structure). You can also contact a member of Culture and Community.

2.8 It should be noted that you will not qualify for protection under the *Corporations Act 2001 (Cth)* (**Corporations Act**) if the matter is not reportable under this policy.

2.9 In New Zealand, it should be noted that you will not qualify for protection under the *Protected Disclosures Act 2022 (Act)* if your disclosure is not within the meaning of 'protected disclosure' under section 9 of that Act.

3. How to make a report?

3.1 You have several channels available for making a report if you become aware of any conduct that is reportable. It is important to remember that a report must be made to one of the following eligible recipients in order for it to be protected.

Anonymous reporting

3.2 When you make a report under this policy, you may make it anonymously. However, this may impose some practical limitations on our ability to effectively investigate your report. You may make an anonymous report via an anonymised email address or an anonymous telephone call.

Internal reporting

- 3.3 You can make a report to a Group Manager if you become aware of any concerns or potential adverse activity. Alternatively, staff members may make a report to the Chief Executive Officer, Chief Financial Officer or General Counsel with whom they are comfortable with to raise their concerns. This can be done in person, via an email or over the phone.
- 3.4 You can contact the Liberty Whistleblower Investigations Team via email at whistleblower@liberty.com.au. This is a confidential email account and can only be viewed by the Whistleblower Officer and Chief Risk Officer/Group Manager - Risk and Compliance (Whistleblower Investigations Team).

External reporting

- 3.5 Additionally, if you would prefer not to make a report internally, we have appointed Your Call as an external whistleblower service provider. Your Call contact details are:
- (a) Telephone (AU) 1300 790 228 (NZ) 0800 123 508 or email yourcall.com.au/report.
 - (b) Report quoting Organisation ID: LIBGRP.
 - (c) Telephone lines are open Mon-Fri 9am-12am AEST and email is available 24/7.
- 3.6 You can make a report to a regulator, such as ASIC, APRA and the ATO (for tax matters). You may also contact a regulator for additional information about reports. For example, you can find whistleblower information provided by ASIC at [Information Sheet 239](#) (*How ASIC handles whistleblower reports*).
- 3.7 In New Zealand, under the Act, you can make a protected disclosure to the Office of the Ombudsman (ombudsman.parliament.nz), to a professional regulator of a membership body of a particular profession with the power to discipline its members, or any other appropriate authority listed at Appendix C (each an **Appropriate Authority**). You can report the protected disclosure to any Appropriate Authority at any time, rather than having to first report to the Liberty Group.

Other eligible recipients

- 3.8 Reports may also be protected when they are made to other eligible recipients. These include any disclosures made to.
- (a) an actuary of the Liberty Group;
 - (b) a member of the audit team conducting an audit of the Liberty Group;
 - (c) a legal practitioner if you obtain legal advice or legal representation in relation to how the whistleblower provisions operate under the *Corporations Act*, or, in New Zealand, the *Protected Disclosures Act*; and
 - (d) In Australia, a parliamentarian or a journalist if made in 'emergency' and 'public interest' situations (refer to Appendix A).
- 3.9 You should seek independent legal advice before making a report to a parliamentarian or a journalist.

4. What happens when you make a report?

- 4.1 All reports made under this policy are investigated by the Whistleblower Investigation Team, comprising the Whistleblower Officer (Chief Risk Officer/Group Manager - Risk and Compliance) and Chief Executive Officer. An investigation plan will be developed to ensure all relevant questions are addressed and the scale of the investigation will be in proportion to the seriousness of the allegation.
- 4.2 You should note that if you make a report under this Whistleblower Policy, you will be taken to consent to us using the information to investigate the report.
- 4.3 During the investigation:
- (a) strict confidentiality will be maintained;
 - (b) the investigation process will be objective, fair and independent and conducted in a timely manner;
 - (c) all relevant witnesses will be interviewed, and discussions noted;
 - (d) access to information relating to the disclosure and communications will be restricted to individuals in charge of the investigation;
 - (e) you will be provided updates during the key stages of the investigation including expected timeframes; and
 - (f) up until the investigation is completed, work will continue as normal.
- 4.4 The findings of an investigation will be documented and reported to the Board Risk, Audit and Compliance Committee. The method for documenting and reporting the findings will depend on the nature of the report.
- 4.5 If possible, we will contact you to inform you of the outcome of an investigation. However, for confidentiality reasons and the need to protect all parties to an investigation, this information may be limited. Any report remains the property of the Liberty Group and will not be shared with you or any person.
- 4.6 You may seek a review of the investigation if you are not satisfied with the outcome by contacting the General Counsel. The General Counsel will review the investigation. However, we are not obliged to reopen an investigation if we conclude a review and find that the investigation was conducted properly.

5. How are you protected?

Identity

- 5.1 Your privacy will be maintained at all times and any discussions are confidential. It is illegal for a person to identify a person who makes a report under this policy or provide any information that is likely to lead to the identification of that person.
- 5.2 If you make a disclosure, your identity will only be shared if you give consent to share that information or the disclosure is allowed or required by law under the Corporations Act (in relation to Australia) or the Act (in relation to New Zealand). If the release of your identity is required or allowed by law, the Liberty Group will comply with the legal requirements for releasing your identity under the relevant legislation.

- 5.3 The following steps will be taken to protect your identity and keep information confidential and secure:
- (a) all personal information or references to the staff witnessing an event will be redacted;
 - (b) the staff member will be referred to in a gender-neutral context; and
 - (c) where possible, staff will be contacted to help identify certain aspects of the event that could inadvertently identify them; in this instance extra support will be given to the staff member including counselling and professional or legal services.

Detrimental conduct

- 5.4 The Liberty Group will not tolerate any detrimental conduct against any person who has, or is believed to have, made a report under this policy. Examples of detrimental conduct include:
- (a) dismissal or demotion of a staff member;
 - (b) treating a person less favourably;
 - (c) harassment or intimidation of a person;
 - (d) harm or injury to a person, including psychological harm;
 - (e) discrimination, detriment or damage to a person's reputation; and
 - (f) threats of any of the above.
- 5.5 Protection applies to anyone who makes a report under this policy if it is made honestly, in good faith and based on reasonable grounds.
- 5.6 You may also be entitled to the following legal protections for making a report under this policy:
- (a) No contractual or other remedy may be enforced or exercised against you on the basis of the disclosure, and a contract to which you are a party may not be terminated on the basis that the disclosure constitutes a breach of the contract;
 - (b) protection from civil, criminal and administrative liability (however, you will not be protected from civil or criminal liability for any of your own conduct); and
 - (c) in Australia, compensation or other remedy if you have suffered loss, damage or injury because of a report or if someone believes or suspects that you have made a report.
- 5.7 In New Zealand, the Act does not have a general compensation or remedy regime for loss, damage or injury suffered as a result of making a report. The Act does allow you to bring a claim under the relevant statutes if you believe that you have been victimised, if you believe your identity was released in breach of the Act, or if you are an employee and have been subject to retaliation or threats of retaliation.

Escalation process

- 5.8 You should contact the Whistleblower Officer if you are concerned that you have been subjected to detrimental conduct or if you believe that your report has not been dealt with in accordance with this policy.

- 5.9 If you consider that the Whistleblower Officer has not dealt with your concerns appropriately or that the policy has not been properly followed by the Liberty Group, you may ask the Whistleblower Officer to escalate your concerns to the Chair of the Board of Directors.
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6. Training

- 6.1 We provide mandatory training on this Whistleblower Policy to all staff members at induction and on an annual basis as of part of our Safetrac training modules.
- 6.2 Separate specialist training is delivered to eligible recipients and those involved in dealing with reports.
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7. Review of the policy

- 7.1 This policy will be reviewed and approved annually by the Board of Directors.

Appendix A

1. Emergency disclosure

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

- (a) a report to ASIC or APRA has already been made
- (b) you have 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;
- (c) prior to making a report, you have given written notice to ASIC or APRA that includes sufficient information to identify the previous report and that you intend to make an emergency disclosure; and
- (d) the extent 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. Public interest disclosure

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

- (a) at least 90 days have passed since you made a report to ASIC or APRA;
- (b) you have reasonable grounds to believe that no action is being taken and you have reasonable grounds to believe that making a further disclosure is in the public interest; and
- (c) before making the disclosure, you have given written notice to ASIC or APRA that includes sufficient information to identify the previous report and that you intend to make a public interest disclosure.

Appendix B

- 1.1 The Corporations Act provides protections in relation to reporting information a person has reasonable grounds to suspect concerns misconduct, or an improper state of affairs or circumstances, in relation to the Liberty Group or indicates that the Liberty Group (or any of its officers or employees) has engaged in conduct that:
- (a) constitutes an offence against, or contravention of, a provision of any Corporations Legislation (see list below);
 - (b) constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or longer;
 - (c) represents a danger to the public or the financial system; or
 - (d) prescribed by the Corporations Regulations 2001 (Cth) as a 'disclosable matter' for the purposes of section 1317A(5) of the Corporations Act.
- 1.2 Disclosures made by Eligible Persons in respect of a matter described in this Appendix B may be entitled to the protections set out in section 5 of this policy.

2. Corporations Legislation

2.1 For the purposes of this Appendix B, Corporations Legislation means the:

- (a) *Corporations Act 2001*;
- (b) *Australians Securities and Investments Commission Act 2001* (Cth);
- (c) *Banking Act 1959* (Cth);
- (d) *Financial Sector (Collection of Data) Act 2001* (Cth);
- (e) *Insurance Act 1973* (Cth);
- (f) *Life Insurance Act 1995* (Cth);
- (g) *National Consumer Credit Protection Act 2009* (Cth);
- (h) *Superannuation Industry (Supervision) Act 1993* (Cth);
- (i) *Taxation Administration Act 1953* (Cth); and
- (j) any instrument made under an act referred above.

Appendix C

Examples of appropriate authorities to make disclosures to under section 25 of the *Protected Disclosures (Protection of Whistleblowers) Act 2022* (NZ):

Nature of concern	Appropriate authority
Anticompetitive conduct	Commerce Commission
Banks (registered banks)	Reserve Bank of New Zealand
Bullying or harassment, including sexual harassment	WorkSafe New Zealand Human Rights Commission
Consumer protection	Commerce Commission
Crime	Commissioner of Police Director of the Serious Fraud Office
Discrimination	Human Rights Commission
Financial reporting (private sector—issuers and large companies)	Financial Markets Authority
Financial reporting (public sector)	Controller and Auditor-General
Financial service providers' conduct	Financial Markets Authority
Health and safety (work-related)	WorkSafe New Zealand Ministry of Business, Innovation, and Employment
Insurers (licensed insurers)	Reserve Bank of New Zealand
Privacy of individuals or security of personal information	Privacy Commissioner
Professional or trade conduct	Ministry of Business, Innovation, and Employment
Prosecutions	Solicitor-General
Racism	Human Rights Commission
Sector regulation	Commerce Commission
Whistleblowing and protected disclosures	Ombudsman