

# Whistleblower Protection Policy

Newcastle Greater Mutual Group Ltd  
ACN 087 651 992



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Additional independent information about whistleblowing can be found at:

- Whistleblower rights and protections (ASIC): <https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/whistleblower-rights-and-protections/>
- Become a Whistleblower or make a public interest disclosure (APRA): [www.apra.gov.au/become-a-whistleblower-or-make-a-public-interest-disclosure](http://www.apra.gov.au/become-a-whistleblower-or-make-a-public-interest-disclosure)
- Tax whistleblowers (ATO): <https://www.ato.gov.au/general/gen/whistleblowers/>

## Why we have this Policy

This Whistleblower Protection Policy outlines:

- How you can speak up about any misconduct or wrongdoing and how we handle your concerns; and
- The protections in place under whistleblowing laws for those reporting certain misconduct or wrongdoing ('disclosable matters').

An effective whistleblowing process is required by law and is of vital importance to:

- Do the right thing and help our staff feel safe and supported to do so;
- Prevent and detect misconduct and wrongdoing;
- Our long-term sustainability and reputation;
- Comply with our obligations.

This Policy is our whistleblower policy under relevant whistleblowing laws and applies to Newcastle Greater Mutual Group Ltd (NGM Group) and all related entities.

## About Whistleblower Protections at NGM Group

We encourage and support speaking up (whistleblowing) by following these principles:

### **Fostering a speak up culture**

Doing the right thing means that we create an environment where employees feel they can speak up and report issues.

Employees are required to report instances of misconduct or wrongdoing.

Current staff can also raise concerns via other channels in the ordinary course of business, including by reporting an incident, issue or hazard. Further information on available channels for staff can be found on the intranet.

### **Whistleblower protections and support**

People that make a whistleblower report will be protected from detrimental conduct or harm relating to that report, so that they can feel safe to speak up.

We will maintain confidentiality relating to speaking up to the fullest extent possible and allow concerns to be raised anonymously.

### **Taking appropriate action**

All matters raised will be treated seriously and investigations will be conducted in a timely and fair manner.

**Ensuring transparency and awareness**

This Policy will be made available on our public website and accessible via the intranet for current staff.

Training on whistleblowing for all officers and employees will occur at induction, and every two years.

**Who can speak up and what they can speak up about under this Policy**

A person who speaks up under this Policy is also known as a reporter or whistleblower. The following people ('eligible reporters') can report a concern and be eligible for protections under this Policy:

- Current or former employees (including those employed on a temporary or contract basis);
- Current or former officers and directors;
- Current or former service providers, associates or suppliers and their current or former employees; and
- A relative, dependant or spouse of any of the above.

Any of the above eligible reporters can make a report under this Policy about the following types of matters and receive whistleblower protection:

<b>Included</b>	<p>The type of concerns that if raised under this Policy are eligible for protection are called 'disclosable matters'.</p> <p>A disclosable matter is where you have reasonable grounds to suspect misconduct or wrongdoing in relation to NGM Group or one of its related entities, such as:</p> <ul style="list-style-type: none"> <li>• Illegal conduct, such as theft, violence, criminal damage or breach of duty;</li> <li>• Unethical or dishonest conduct, such as fraud, bribery or corruption;</li> <li>• Breaches of law or regulatory requirements;</li> <li>• Financial irregularities or improper conduct relating to tax affairs, financial accounting or audits;</li> <li>• Risks to public safety, the environment or the financial system;</li> <li>• Concealing misconduct; or</li> <li>• Engaging in or threatening detrimental conduct against a person in relation to speaking up.</li> </ul> <p>If the concern reported turns out to be incorrect, the person speaking up still qualifies for protection if they had reasonable grounds to suspect misconduct or wrongdoing.</p>
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	<p>Protections do not extend to false reports. Current staff, officers or directors who knowingly make a false report will be subject to disciplinary action.</p> <p>More information can be found in the Definitions section, or you can direct queries to the Whistleblower Protection Officer (WPO) or seek independent legal advice.</p>
<p><b>Excluded</b></p>	<p>Some types of concerns are not covered by this Policy and reports about them are not protected under whistleblowing laws. These are called ‘excluded matters’ and include:</p> <p><b>1. Personal work-related grievances</b></p> <p>Personal work-related grievances are issues that directly affect you personally in relation to your employment with NGM Group.</p> <p>Examples include interpersonal conflict between you and another employee; disciplinary matters; remuneration, transfer or promotion decisions; or unfair treatment.</p> <p>Whilst not covered under this Policy, personal work-related grievances may attract protections under other legislation, such as the Fair Work Act. Employees are encouraged to raise personal work-related grievances to their manager or People &amp; Culture.</p> <p>There are some cases where a personal work-related grievance may be covered by this Policy and qualify for protection, including where:</p> <ul style="list-style-type: none"> <li>• It is part of a mixed report that includes other issues that are disclosable matters;</li> <li>• It has significant implications beyond just you personally, for example systemic underpayment of remuneration;</li> <li>• It relates to a breach of employment laws punishable by imprisonment of 12 months or more;</li> <li>• It is conduct that represents a danger to the public; or</li> <li>• You seek independent legal advice (not from the NGM Group legal team) which confirms that a matter is disclosable and qualifies for whistleblower protections.</li> </ul> <p><b>2. Customer complaints</b></p> <p>Customers concerned with the way we have handled a matter, product or service can make a complaint. More information on how we handle complaints can be found at <a href="https://www.newcastlepermanent.com.au/contact-us/compliments-and-complaints">https://www.newcastlepermanent.com.au/contact-us/compliments-and-complaints</a> or at <a href="https://www.greater.com.au/complaints">https://www.greater.com.au/complaints</a>.</p>

### Questions about this Policy

You can raise any questions, concerns or obtain additional information about speaking up or what to do before speaking up on the intranet (for staff), from your manager, from first or second line risk and compliance representatives, the WPO, the Whistleblower Investigation Officer (WIO), or the Chief People & Culture Officer.

## How to speak up under this Policy

### Raising your concern about misconduct or wrongdoing

To make a report under this policy, you must speak up about a disclosable matter to an eligible recipient (internal reporting channel) or through an external reporting channel. We have several confidential channels available to make a report verbally or in writing.

When making a report, you should ensure you:

- Provide clear information, based on facts and first-hand knowledge;
- Do not omit material information; and
- Are not biased or report facts that may give rise to a perception of bias.

You have options for protecting your identity when making a report. Regardless of the option you choose, we will keep the information in relation to your identity and your report confidential to the fullest extent possible, by allowing you to:

- Choose to remain anonymous for the duration and after the investigation process has been finalised, noting that remaining anonymous may affect our ability to effectively investigate the matter and to communicate with you regarding the report;
- Refuse to answer any questions asked that you feel could reveal your identity and can adopt a pseudonym when making a report if you wish; and
- Change your mind at any time and disclose your identity to the WPO or WIO even if you initially requested anonymity.

You are encouraged to maintain communication with the WPO throughout the investigation process.

### Internal reporting channels

You are encouraged to make a report to an internal eligible recipient to enable the report to be addressed as soon as possible. This can be done by completing a [Whistleblowing Form](#) and providing it to one of the following:

- An officer or senior manager; or
- The WPO;
- The WIO; or
- A member of the internal audit team or external auditors, or actuaries conducting an audit of NGM Group.

If you are not an eligible recipient but receive a report that could constitute reportable conduct outside of the speaking up channels, you should maintain confidentiality and contact the WPO or for staff, refer to the intranet for guidance.

**External reporting channel – KPMG FairCall Service**

If you don't feel comfortable making a report via an internal reporting channel, you are able to make a report through the KPMG FairCall Service. This is an objective, confidential and independently monitored reporting service.

<b>Phone</b>	<ul style="list-style-type: none"> <li>• Toll-free service monitored by trained and experienced KPMG professionals: 1800 500 965.</li> <li>• Operating Hours: Business days between 7am – 5pm (AEST).</li> <li>• Out of Hours: Personnel may leave a voicemail or choose to have their Disclosure received by KPMG South Africa. If a voicemail is left with sufficient details, KPMG will return the call upon resumption of the hotline's normal operating hours as set out above.</li> <li>• Reporters will be provided with a confidential reference number by the operator.</li> </ul>
<b>Mailing Service</b>	<p>Disclosures can be made to a secure mailbox at the following address:</p> <p style="padding-left: 40px;">The <i>FairCall</i> Manager          KPMG Forensic          PO Box H67          Australia Square          Sydney NSW 1213</p>
<b>Online</b>	<p><a href="https://www.kpmgfaircall.kpmg.com.au/ngmgroup">https://www.kpmgfaircall.kpmg.com.au/ngmgroup</a></p>

Prior to making a report to KPMG FairCall Service, you should review the [KPMG Privacy Statement](#).

## Other external reporting channels

The below summarises the ways you can make a report to outside of NGM Group and qualify for protection:

<p><b>Actuary or Auditors</b></p> <p>Reports about a disclosable matter can be made to an auditor, or a member of the audit team conducting an audit of NGM Group or a related body corporate.</p> <p><b>Regulators</b></p> <p>Reports about disclosable matters can be made to a regulator (ASIC, APRA or for tax affairs, the ATO), verbally or in writing.</p>	
<p><b>Public interest disclosures and emergency disclosures</b></p> <p>Protections are also available in certain circumstances where a report is made to a journalist or parliamentarian, as follows:</p>	
<p><b>Public interest disclosure</b> <i>all of the following criteria</i> are met:</p>	<p><b>Emergency disclosure</b> <i>all of the following criteria</i> are met:</p>
<p>90 days have passed since you made a report to a regulator (ASIC, APRA or for tax affairs, the ATO).</p>	<p>You previously made a report to a regulator. Note: no waiting period applies (ASIC, APRA or for tax affairs, the ATO).</p>
<p>You have reasonable grounds to believe:</p> <ul style="list-style-type: none"> <li>Action is not being taken in relation to your report; and</li> <li>That making a further disclosure of the information is in the public interest.</li> </ul>	<p>You have reasonable grounds to believe the information concerns a substantial and imminent danger to the health or safety of one or more people or to the natural environment.</p>
<p>You have given written notice to the regulator (ASIC, APRA or for tax affairs, the ATO), referencing your original report, to notify them that you intend to make a public interest or emergency disclosure.</p>	
	<p>The information reported is no more than necessary to inform the recipient of the substantial and imminent danger.</p>

## Seeking legal advice

If you require further information on whistleblowing laws and the protections available for your specific circumstances, you can seek independent legal advice, at your own expense. Disclosing information to an independent legal practitioner (i.e, not the NGM Group legal team) in order to obtain this legal advice is protected under whistleblowing laws.



## **Whistleblower protections and support when speaking up under this Policy**

We understand that you may be worried about possible repercussions from speaking up. We are committed to supporting and protecting you even if it turns out your concerns are mistaken.

### **Protecting your identity and maintaining confidentiality**

We take our obligation to protect your confidentiality very seriously. Reasonable steps will be taken to reduce the risk that you could be identified as part of any process conducted under this Policy. This will be achieved by applying secure record-keeping and information sharing practices, such as:

- All information received from you, as well as the fact that you have made a report and any record produced as part of an investigation, is held securely;
- Access to this information is restricted to people required to access it for the purpose of this Policy; and
- Removing information relating to your identity or other information likely to lead to your identification to the extent we are able to do so.

If you choose to disclose your identity it will be protected in accordance with this Policy at all stages of the process, as it is illegal for anyone to identify a reporter or disclose information that is likely to lead to identification of the reporter. However, under law, NGM Group may need to disclose your identity to lawyers, regulators or law enforcement authorities, without your consent.

Disclosing confidential information, other than in accordance with this Policy, may lead to disciplinary action and legal penalties.

If you would like to make a complaint about a breach of confidentiality, contact the WPO or a regulator (ASIC, APRA or for tax affairs, the ATO).

### **Protecting you against detrimental conduct**

We will not tolerate any detrimental conduct that is inflicted on any person in relation to a whistleblower report, whether you or someone else actually has or is intending to make a report.

Examples of what may be considered detrimental conduct include:

- Disciplinary action, including dismissal, suspension or demotion;
- Any form of discrimination, harassment, bullying, intimidation or threatening behaviour;
- Injury or harm including psychological harm;
- Damage or threats to your property, business, financial position or reputation;
- Revealing your identity as a reporter without your consent or contrary to law; or
- Threatening to carry out the above actions.

Detrimental conduct does not include administrative action that is reasonable for the purpose of protecting a person from detriment or managing unsatisfactory work performance.

We will take all reasonable steps to protect you and individuals participating in an investigation from detrimental conduct and will take appropriate action where such conduct is identified, including by:

- Ensuring confidentiality and protecting your identity, so far as is possible;
- Taking disciplinary action against any person found to have engaged in detrimental conduct;
- Offering you a leave of absence while a matter is investigated, where this is reasonably required to protect you;
- Relocating you or other people to a different work group or department, where this is reasonably required to protect you;
- Offering wellbeing support;
- The WPO is responsible for identifying and implementing appropriate support and protection measures to individuals who are concerned that they may experience detrimental conduct because of speaking up or where risks of detrimental conduct are identified.

If you believe you have suffered from detrimental conduct in breach of this Policy, we encourage you to raise this immediately with the WPO or through one of the speaking up channels. You can also seek independent legal advice or contact a regulator (ASIC, APRA or for tax affairs, the ATO).

### **Wellbeing support**

All employees have access to the Employee Assistance Program (EAP), a nationwide provider who offers a range of confidential support services and counselling. They can be contacted 24/7 by calling 1800 818 728. Further information about the EAP is available for staff on our intranet.

Where a wellbeing risk is identified at any stage in the process, the WPO will be engaged to assist and support in monitoring the welfare of the person concerned.

### **Fair treatment of people mentioned in a report**

Where an employee is mentioned in a report or is the subject of a speaking up report, we will ensure they receive fair treatment. We do this by:

- Handling the report information and investigation in a confidential manner, as far as possible;
- Offering wellbeing support;
- Ensuring investigations are conducted in an objective, fair and independent manner; and
- Where permitted by law, notifying the employee about the subject matter of the report prior to any actions being taken and providing them with an opportunity to respond.

## Remedies and protection from liability

Reporters will generally be protected from the following in relation to making a report:

- Civil liability, e.g. legal action for breach of employment contract or duty of confidentiality;
- Criminal liability, e.g. attempted prosecution for unlawfully releasing information (except for making a false report); and
- Administrative liability, e.g. disciplinary action.

However, a reporter may still be subject to civil, criminal, or administrative in relation to their own misconduct revealed by the report.

You can seek compensation or remedies through a court if you suffer loss, damage or injury because of a report and we failed to take reasonable precautions to prevent detrimental conduct.

## How we handle a whistleblower report

The following roles within the organisation will be responsible for these steps, noting that the WPO and the WIO operate independently of each other and the responsibilities for these roles cannot reside with one person:

Speaking up Role Title	Function	Role performed by:
WPO*	<ul style="list-style-type: none"> <li>• Receives and reviews all reports of disclosable matters;</li> <li>• Determine the action to be taken and whether whistleblower protection is needed provide protect them if needed; and</li> <li>• Decides whether the report needs further investigation by the Whistleblower Investigation Officer (WIO).</li> </ul> <p><i>(Each WPO will provide details of the report to the other WPO for transparency, but both will otherwise keep confidential or as required under Whistleblower Laws).</i></p>	<p>Greg Nyman Chief Legal &amp; Corporate Governance Officer 307 King Street Newcastle West 2302 P: 02 4921 9183 M: 0409 657 990 <a href="mailto:greg.nyman@greater.com.au">greg.nyman@greater.com.au</a></p> <p>Vera Corbett General Counsel 307 King Street Newcastle West 2302 P: 02 4927 4478 M: 0458 274 255 <a href="mailto:Vera.Corbett@newcastlepermanent.com.au">Vera.Corbett@newcastlepermanent.com.au</a></p>

<p>WIO*</p> <p><i>*note: WPO and WIO act independently of each other and the responsibilities of each role do not reside with one person.</i></p>	<ul style="list-style-type: none"> <li>• Investigates as appropriate;</li> <li>• May refer to an external investigator; and</li> <li>• Has a direct reporting line to the CEO and Board audit committee.</li> </ul>	<p>Grant Katz            Head of Internal Audit            307 King Street Newcastle West 2302            P: 02 4927 4515            M: 0425 213 157  <a href="mailto:Grant.Katz@newcastlepermanent.com.au">Grant.Katz@newcastlepermanent.com.au</a></p> <p>Anne Fullick            NGM Group Internal Audit            307 King Street Newcastle West 2302            P: 02 4927 3867            M: 0414 655 741  <a href="mailto:Anne.Fullick@newcastlepermanent.com.au">Anne.Fullick@newcastlepermanent.com.au</a></p> <p>The WIO has a direct reporting line to the CEO and Board Audit Committee for all whistleblower reports, and access to independent advisers when required, and will escalate where necessary.</p>
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### Handling a whistleblowing report

When handling a whistleblowing report, we will take the following approach:

<p><b>Receiving a report</b></p>	<p>Where a report is received via KPMG FairCall, KPMG will notify the NGM Group's WPO within 24 hours.</p> <p>Where a report is made through an internal channel to an eligible recipient or received from KPMG FairCall, the recipient will promptly notify the WPO who may contact the WIO and:</p> <ul style="list-style-type: none"> <li>• Maintain confidentiality in accordance with this Policy;</li> <li>• Determine any protection measures that are required, including any measures that may need to be taken by the NGM Group or the WIO to protect the identity of the reporter or ensure that they feel supported while the investigation is on foot; and</li> <li>• Report any concerns about detrimental conduct to the WIO.</li> </ul>
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<b>Investigating and keeping the discloser informed</b>	<p>Once a report is received under this Policy, the WIO will:</p> <ul style="list-style-type: none"> <li>• Where possible, acknowledge receipt of the report with the reporter or via the WPO;</li> <li>• Make an assessment to determine whether the matter falls within scope of this Policy and an investigation is required;</li> <li>• Where necessary and possible, contact the reporter for further information;</li> <li>• Determine if an investigation is not able to be undertaken e.g., where the reporter is not able to be contacted and the information provided is not sufficient;</li> <li>• Obtain external advice or assistance where required;</li> <li>• Provide updates to the WPO to provide to the reporter throughout the investigation process, including at commencement, at least every 28 days and upon conclusion;</li> <li>• Consult with the WPO regarding any required protection measures;</li> <li>• Act impartially and conduct the investigation without bias;</li> <li>• Give the person against whom any allegation is made the right to respond;</li> <li>• Maintain appropriate records and documentation; and</li> <li>• When the investigation is complete, prepare a written report which details their findings, outcome of the investigation and where appropriate, recommendations.</li> </ul>
<b>Making a decision</b>	<p>Following conclusion of the investigation and receipt of the investigation outcomes report from the WIO, the individual making the decision will:</p> <ul style="list-style-type: none"> <li>• Consider the report to ensure they are satisfied that all verifiable disclosable matters have been investigated;</li> <li>• Determine actions, if any, to be taken as a result of the investigation based on the reports and information received;</li> <li>• Make the final decision, in consultation with the WIO, as to whether disciplinary or other action will be initiated in respect of the reporter's involvement in any misconduct or false disclosure;</li> <li>• Inform the WIO, WPO and any person who is the subject of the report that a determination has been made;</li> <li>• Notify as required, the CEO and relevant Board or Audit Committee and maintain a register of finalised speaking up reports; and</li> <li>• Protect the confidentiality of the reporter and comply with legal obligations when making notifications.</li> </ul>

Further detail for staff on how these activities are to be undertaken can be found on the intranet.

## Definitions

<p>Disclosable Matter/Breach of law</p>	<p>A disclosable matter is where there are reasonable grounds to suspect misconduct or wrongdoing, such as:</p> <ul style="list-style-type: none"> <li>• illegal conduct, such as theft, violence or criminal damage, breach of trust or breach of duty relating to NGM Group or any related entity;</li> <li>• unethical or dishonest conduct, such as fraud, bribery or corruption;</li> <li>• behaviour that is likely to result in financial or non-financial loss to the NGM Group or any related entity;</li> <li>• breaches of laws including behaviour that is likely to result in breaches of: <ul style="list-style-type: none"> <li>○ the Corporations Act 2001,</li> <li>○ the Income Tax Assessment Act 1936,</li> <li>○ the Privacy Act 1988,</li> <li>○ anti-money laundering or anti-bribery laws,</li> <li>○ any offence under: <ul style="list-style-type: none"> <li>▪ the Banking Act 1959;</li> <li>▪ the Financial Sector (Collection of Data) Act 2001;</li> <li>▪ the Insurance Act 1973;</li> <li>▪ the Life Insurance Act 1995;</li> <li>▪ the National Consumer Credit Protection Act 2009; or</li> <li>▪ the Superannuation Industry (Supervision) Act 1993.</li> </ul> </li> </ul> </li> </ul> <p>Some conduct may be a disclosable matter even if it does not breach a particular law. For example, conduct that would be of interest to a regulator, or creates a high risk of customer harm or a significant risk to public safety or stability in the financial system even if it does not breach a particular law.</p>
<p>Regulatory requirements</p>	<p>Such as those administered by Australian Securities &amp; Investments Commission (ASIC), Australian Prudential Regulation Authority (APRA) or the Australian Competition and Consumer Commission (ACCC) or the Australian Taxation Office (ATO).</p>
<p>Reporter/ Discloser</p>	<p>A person who has raised a concern (made a disclosure) through a speaking up channel.</p>
<p>Report / Disclosure</p>	<p>A concern reported through a speaking up channel.</p>
<p>Officer</p>	<p>Has the same meaning as contained in the Corporations Act and in respect to NGM Group, refers to a Director or a Member of the Executive Committee.</p>

Senior manager	<p>Has the same meaning as contained in the Corporations Act. For NGM Group, under the Corporations Act, a 'senior manager' is a person other than a director or company secretary who makes, or participates in making decisions that:</p> <ul style="list-style-type: none"> <li>• affect the whole, or a substantial part of, the business of the company or organisation, or</li> <li>• have the capacity to significantly affect the company's or organisation's financial standing.</li> </ul>
Parliamentarian	A member of the Parliament of the Commonwealth or of a state or territory.
Regulator	<p>In relation to whistleblower laws, ASIC or APRA.</p> <p>In relation to the whistleblowing protections regime under the Taxation Administration Act, the Australian Taxation Office (ATO).</p>
Tax affairs	Affairs relating to all taxes imposed by or under, or assessed or collected under, all laws administered by the Tax Commissioner.
Whistleblowing laws	Corporations Act 2001, or for tax affairs, Taxation Administration Act 1953.

Where a term has already been explained elsewhere in this Policy, it will not be duplicated here.