Whistleblower Policy

Corporate Policy

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Purpose

Probe is committed to the highest standards of integrity and promoting a culture of honest and ethical behaviour, corporate compliance and good corporate governance.

In keeping with these standards of honesty, we actively encourage everyone in the business to challenge any behaviour they believe is inconsistent with any of our values and this Policy.

This Policy has been established to:

- name;
- encourage the reporting of Misconduct, unlawful and unethical behaviour;
- help deter wrongdoing, in line with Probe's risk management and governance framework and Code of Ethics and Conduct;
- ensure individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported;
- describe how Probe will protect the identity of persons making disclosures, and other persons because a disclosure has been made, under this Whistleblower Policy and safeguard them from detriment and retaliation;
- provide transparency around Probe's framework for receiving, handling and investigating disclosures;
- ensure Protected Disclosures (which are a special type of disclosure) are dealt with appropriately and on a timely basis;
- ensure Probe complies with its regulatory and legal obligations including the Treasury Laws Amendment (Whistleblower Protections) Act 2019 (Act);
- to support Probe's values and Code of Ethics and Conduct; and
- to support Probe's long term sustainability and reputation.

This Policy is an important tool for helping Probe to identify wrongdoing, promote a speak up culture and explains the operation of whistleblowing protections as they apply across Probe.

This Policy applies to Eligible Whistleblowers in relation to the Protected Disclosure of Disclosable Matters.

Scope

As Probe operates in multiple countries this Policy is subject to the law of those countries. This means that, in some cases, disclosures made under this Policy may be handled differently according to legislation or regulation in that jurisdiction. Regardless of geography we encourage those who are aware of or suspect wrongdoing that fits within the scope of this policy to speak up.

Australian Whistleblower Protection Laws outline in detail the rights and protections an Eligible Whistleblower has in making a Protected Disclosure and extends to permitted disclosures that may be made to bodies or persons outside the organisation. The specific requirements under Australian Whistleblower Laws are addressed in Appendix 1 of this Policy.

This Policy is not intended to apply to customer complaints.

The Eligible Whistleblower must refer to this policy or request protections under this policy when making a Protected Disclosure.

Probe encourages Eligible Whistleblowers, or other persons, to raise issues or ask questions if:

a. they are unsure:

- whether they are covered by this Policy;
- whether their concerns qualify as a matter to be disclosed under this Policy; or
- as to who they should make a disclosure.

b. They are the subject of a disclosure or a witness in an investigation of a disclosure and seek support or assistance.

c. They seek information about the type of protections and immunities available to Eligible Whistleblowers, and other persons, under this policy.

Responsibilities

Managers are responsible for ensuring:

- they are familiar with the types of improprieties that might occur within their area of responsibility and they are alert for any indication of Misconduct;
- there is an open, transparent and safe working environment;
- employees have ready access to this policy;
- promotion and reporting of actual or suspected cases of inappropriate conduct and unethical behaviour including fostering a speak up culture; and
- when an employee reports such matters on genuine grounds that Protected Disclosures are taken seriously and acted on immediately and the necessary protections and support is provided

All employees have the responsibility to report suspected Misconduct.

The Probe People Team is responsible for coordination of all Misconduct and Disclosable Matter investigations.

What is Misconduct?

An Eligible Whistleblower must have reasonable grounds to suspect information reported by them concerns misconduct or an improper state of affairs or circumstances in relation to Probe or a related body corporate (for example Probe Contact Solutions Australia Pty Ltd, Probe Operations Pty Ltd, Convai Pty Limited, Probe Asia Pacific Pty Ltd, Beepo Support Services Pty Ltd, Probe Customer Management Pty Ltd and Probe Group Holdings Pty Ltd) (**Misconduct**).

Certain requirements need to be met in order for a person to obtain the protections under the Corporations Act and the Policy when making a Disclosure to Probe.

In order for these protections to apply, a Disclosable Matter must:

- be made by an Eligible Whistleblower;
- be made to an Authorised Recipient; and
- concern Misconduct.

Misconduct includes conduct that:

- constitutes an offence against or contravention of prescribed Commonwealth legislation;
- represents a danger to the public or the financial system (even if this conduct does not involve a breach of a particular law); or
- constitutes an offence against any other law of the Commonwealth, where the offence is punishable by imprisonment for a period of 12 months or more

Examples include but are not limited to:

- illegal conduct, such as, theft;
- fraud, misappropriation of funds or property;
- misuse of systems for financial gain;
- offering or accepting a bribe; and
- money laundering.

What is not a Disclosable Matter?

Subject to the exceptions set out below, a Disclosable Matter does not include a 'personal work-related grievance', which concerns a grievance in relation to a whistleblower's employment, or former employment, with Probe that has implications for the Whistleblower personally.

Examples of 'personal work related grievances' include complaints concerning:

- an interpersonal conflict between the discloser and another employee;
- a decision that does not involve a breach of workplace laws;
- a decision about the engagement, transfer or promotion of the discloser;
- the terms and conditions of engagement of the discloser; or
- a decision to suspend or terminate the engagement of the discloser, or otherwise to discipline or performance manage the discloser.

Personal work related grievances are managed under separate mechanisms and policies and can be reported to a Manager, a People Business Partner or through Respect X. A personal work related grievance may still qualify for protection if:

- it includes information about Misconduct, or information about Misconduct includes or is accompanied by a personal work-related grievance (mixed report);
- it relates to a breach of employment or other laws punishable by imprisonment for a period of 12 months or more;
- it is conduct that represents a danger to the public, or the disclosure relates to information that suggests misconduct beyond the discloser's personal circumstances;
- the discloser seeks legal advice or legal representation about the operation of the whistleblower protections under the Australian Corporations Act 2001 (Cth).

If unsure whether a grievance relates to Misconduct under this Policy, or a personal work-related grievance that is more appropriately managed through a relevant workplace behaviour policy of Probe, please seek guidance from a Protected Disclosure Officer (see list below).

To whom, and how, should disclosures under this Policy be made?

Probe requires that all disclosures be treated with the utmost seriousness and encourages Eligible Whistleblowers to report Misconduct to one of the Protected Disclosure Officers set out below. It is our objective to identify and address any wrongdoing as early as possible.

Name	Email
Elisha Parks (Whistleblower Investigations Officer)	elisha.parks@probegroup.com.au
Kristine de Nava (Whistleblower Investigations Officer)	kristine.denava@probegroup.com.au

If a personal work related grievance may have a significant implication for Probe and wider ramifications for the whistleblower personally, it may be appropriate to disclose the matter under this policy as a Disclosable Matter.

Where the grievance relates to detrimental conduct suffered by the Eligible Whistleblower because of making a previous whistleblower disclosure, or seeking legal advice about whistleblower protections, the matter should be reported under this whistleblower policy as a Disclosable Matter (see below section regarding steps).

Without limiting the types of matters, examples of personal work-related grievances that could be reported as a Disclosable Matter under this policy include:

- Mixed reports, for instance where a concern regarding corporate misconduct or wrongdoing is accompanied by a personal work-related grievance, or a personal work-related grievance includes information about corporate misconduct or wrongdoing;
- Where the matter suggests a behaviour or conduct extending beyond the individual's personal circumstances, for instance an individual claim of bullying has indicated that there may be a more general culture of bullying or harassment within Probe; or
- Probe or its officers or agents, has breached an employment (or other) law punishable by more than 12 months imprisonment, or has engaged in conduct that represents a danger to the public.

If unsure whether a grievance is a Disclosable Matter under this whistleblower policy, or a personal work related grievance that is more appropriately managed through a relevant workplace behaviour policy of Probe, seek guidance from the Whistleblower Investigations Officer (see above).

Disclosures that are not Disclosable Matters will not be afforded protection under the Corporations Act 2001 (Cth) and false reporting of any nature will not be tolerated.

Disclosure Process - reporting Misconduct and Disclosable Matters

For a disclosure to be a Protected Disclosure, it must be made to people or entities eligible to receive them, as set out below.

An Eligible Recipient in relation to Probe includes:

- An officer or senior manager of Probe;
- An auditor or any member of the audit team; or
- The individuals authorised by Probe to receive disclosures and set out in the table below.

Probe has identified the following individuals as eligible recipients of a disclosure regarding Misconduct. Probe require that all disclosures be treated with the utmost seriousness and would encourage Eligible Whistleblowers to report Misconduct to one of the listed Probe representatives set out below.

Name	Email
Elisha Parks (Whistleblower Investigations Officer)	elisha.parks@probegroup.com.au
Kristine de Nava (Whistleblower Investigations Officer)	kristine.denava@probegroup.com.au

The position of Whistleblower Investigations Officer will be fulfilled by the Head of People who has primary responsibility for conducting preliminary investigations into disclosure reports received by individuals under this policy and who is primarily responsible for receiving information (directly or anonymously via the STOPline) and protecting an individual within the meaning of this policy. They may be assisted by the Probe Legal Services team.

Alternatively a Protected Disclosure may be made via STOPline, an independent and confidential service available to receive information relating to Misconduct, unlawful or unethical behaviour. Individuals have the option to make anonymous reports to STOPline.

You can make contact with STOPline by:

- Phone - 1300 30 45 50 (Australia only)
- Email - probegroup@stopline.com.au
- Post - Probe Group, c/o - Stopline, PO Box 403 Diamond Creek, VIC 3089
- App - Search for Stopline in the iTunes App Store or Google Play to download the free app and submit a disclosure

Within Australia under the Whistleblower Protection Laws an Eligible Whistleblower may disclose Reportable Misconduct to an officer or senior manager of Probe, or to certain external bodies or individuals.

Appendix 1 sets out the criteria for making such a disclosure of Reportable Misconduct and the protections afforded that person under the Australian legislation.

Where possible, to assist Probe handle a disclosure made under this policy appropriately, an Eligible Whistleblower should provide as much information as possible to enable Probe to investigate the disclosure including any known details about the events underlying the disclosure such as:

- the Eligible Whistleblower's full name, address and preferred contact details. While there is no requirement to provide these details, and Whistleblowers are entitled to remain anonymous whether an Eligible Whistleblower or not, this information greatly assists Probe to investigate the Misconduct and to provide any protections necessary against detrimental conduct.
- the entity, division or department which the Misconduct relates;
- the nature of the alleged wrongdoing including, where relevant, details of the person believed to have committed the wrongdoing or is aware of, or involved in, the wrongdoing;
- when and where the wrongdoing occurred;
- anyone else who may verify the claim, or possible witnesses;
- any supporting information; and
- if the Eligible Whistleblower is concerned about any possible victimisation or acts of reprisal for reporting the matter, or have been subject to detrimental conduct for a previous report of Misconduct, and any assistance or support sought from Probe.

You should provide as much information as possible to enable us to investigate the disclosure including any known details about the events underlying the report such as date, time, location, witnesses, evidence of events, persons involved etc.

Whistleblowers can also make Protected Disclosures to:

- ASIC
- APRA
- The Australian Federal Police
- A legal practitioner.

A public interest disclosure can also be made to a journalist or parliamentarian if:

- The Whistleblower has previously made a Protected Disclosure to a regulator and at least 90 days have passed;
- The Whistleblower has reasonable grounds to believe that action is not being, or has not been taken to address the disclosure;
- The Whistleblower has reasonable grounds to believe that making a further disclosure would be in the public interest;
- The Whistleblower must be given written notification to the authority that they intend to make a public interest disclosure;
- The extent of the information disclosed is no greater than necessary to inform the recipient of the misconduct or improper state of affairs to which the first disclosure related.

An emergency disclosure can be made when:

- The Whistleblower had reasonable grounds to believe the information disclosed concerns a substantial and imminent danger to the health and safety of one or more persons, or the natural environment;
- The individual has previously made a disclosure to an eligible recipient and the Whistleblower has provided a written notification that they intend to make an emergency disclosure.

Reasonable Grounds

A disclosure may have serious consequences, including potential damage to the career prospects and reputation of people who are the subject of allegations of wrongdoing. For this reason a Whistleblower must have reasonable grounds to suspect Misconduct in relation to Probe when making a disclosure under this Policy.

Confidentiality

Probe will take all reasonable steps to protect the identity of the Whistleblower.

Maintaining confidentiality is crucial in ensuring reprisals are not made against an Eligible Whistleblower.

In addition, Probe will provide confidential means for an employee to make protected disclosures anonymously, in accordance with this policy, and still be protected under the Corporations Act 2001 (Cth). This can be done via the STOPline, an independent and confidential service available to receive information relating to Misconduct, unlawful or unethical behaviour. It is important to note that in some circumstances it may be difficult for Probe to properly investigate anonymous disclosures. We encourage Eligible Whistleblowers who wish to remain anonymous to maintain ongoing two way communication with Probe so that Probe can ask follow up questions or provide feedback.

Whistleblowers making a disclosure under this policy should be aware that people may be able to guess or establish their identity where they:

- Have mentioned to other people they are considering making a disclosure.
- Have complained or raised concerns with other people about the subject matter of the disclosure.
- Are one of a very small number of people with access to the information the subject of the disclosure.
- Are disclosing information that has been told to them privately and in confidence.

Investigation Process

The Whistleblower Investigation Officer will receive information regarding Protected Disclosures under this policy from one of three sources:

- A Protected Disclosure directly from an Eligible Whistleblower
- A Protected Disclosure from an Eligible Recipient
- A Protected Disclosure via the STOPline (anonymously and confidentially if the Whistleblower chooses).

After receiving a Disclosure from a Whistleblower under this policy, a recipient of the Disclosure will:

a. take all reasonable steps to ensure the Eligible Whistleblower's identity is kept confidential, subject to any permission given by the Whistleblower; and

b. Determine whether the disclosure falls within the scope of this policy, or whether it is more appropriately managed under another Probe policy.

Where Probe determines that the disclosure falls within the scope of this policy, Probe will, commence the investigation of the Reportable Misconduct as soon as reasonably practicable.

A Protected Disclosure Officer may appoint a person(s) (including an external investigator) to assist or conduct the investigation of the Reportable Misconduct at their discretion.

The investigation will be conducted in a thorough, objective, and fair manner and independent of the Whistleblower, the individuals who are the subject of the disclosure. The investigation process will depend on the nature and substance of the Reportable Misconduct. The object of an investigation into a disclosure is to determine whether there is enough evidence to substantiate or refute the matters reported.

While the particular investigation process and enquiries adopted will be determined by the nature and substance of the Reportable Misconduct, a Protected Disclosure Officer or investigator will contact the discloser to discuss the investigation process including who may be contacted and such other matters as are relevant to the investigation.

An individual who is the subject of a Protected Disclosure (the respondent) may not be informed of the matter until the Protected Disclosure Officer has completed a relevant and appropriate inquiry. In the interests of natural justice, this person(s) will have the right to make submissions and respond to an investigation before any final determination is made regarding alleged Misconduct.

Where a disclosure is submitted anonymously, Probe will conduct the investigation and its enquiries based on the information provided. As such, it may be difficult for Probe to keep an anonymous discloser updated and Probe's ability to effectively investigate a disclosure may be impacted based on the level of information provided.

Where appropriate, Probe will provide feedback to the discloser regarding the investigation's progress and/or outcome (subject to considerations such as the privacy of those against whom allegations are made or whether the matter has been reported to relevant outside regulatory bodies or agencies that are running parallel investigations etc.). The frequency and timeframe for such updates may vary depending on the nature of the disclosure.

Probe will endeavour to complete and satisfactorily close the investigation within 60 business days of its commencement. The Whistleblower Investigations Officer will maintain a record of all Protected Disclosures received and the action taken. If the Disclosure/Investigations Officer judges the Protected Disclosure to be of significance, appropriate action will be instigated immediately.

If the action to be taken takes the form of an investigation, it must be demonstrably fair, independent and comprehensive.

The Whistleblower Investigations Officer will immediately advise the Chief Financial Officer or the Chief Executive Officer of significant Protected Disclosures and provide regular updates.

If the Whistleblower provides their contact details, a Disclosable Matter received by one of the methods listed above, will be acknowledged as received within a reasonable time frame.

Subject to confidentiality obligations, the outcomes of any investigations of significant issues together with any recommendations will be provided to the Chief Executive Officer, Chief Financial Officer and Group General Counsel.

The duration and nature of the investigation process will vary depending on the nature of the Protected Disclosure and the amount of information provided and this will be communicated to the Whistleblower to ensure the process is transparent.

The nature and scope to be determined once receiving the disclosure will include the following:

- The person within or external to Probe that will lead the investigation;
- The nature of any technical, financial or specialist advice that may be required to support the investigation;
- The timeframe for the investigation; and
- Where the whistleblower has provided their identity to the Whistleblower Investigations Officer, seeking consent for their identity to be revealed to the appointed Investigator.

Eligible Whistleblower Protection

Fair Treatment

Probe will investigate and record all Protected Disclosures confidentially, fairly and objectively.

A staff member who is the subject of a Protected Disclosure (the respondent) may not be informed of the matter until the Whistleblower Investigations Officer has completed a relevant and appropriate inquiry. In the interests of natural justice, this person(s) will have the right to make submissions and respond to an investigation before any final determination is made regarding alleged Misconduct.

The making of any malicious report of Misconduct that, on investigation, is shown to be without foundation, will be treated as a serious matter in accordance with the Workplace

Conduct and Performance Policy.

For the avoidance of doubt, where a person makes a report of Misconduct and:

- believes on reasonable grounds that the information is true; or
- is not in a position to form a belief on reasonable grounds about the truth of the information but believes on reasonable grounds that the information may be true and is of sufficient significance to justify its disclosure so that the truth may be investigated that disclosure will not be deemed to be malicious for the purposes of this Policy.

A whistleblower, or other person, who has suffered loss, damage, injury caused by Detrimental Action or if Probe fails to take reasonable precautions to prevent Detrimental Actions, the person may seek compensation or other remedies through the courts of the applicable jurisdiction.

If the Whistleblower is not satisfied with the outcome of an investigation into their Disclosable Matter, they may write to the Whistleblower Investigations Officer or the Senior Legal Counsel seeking a review of the outcome.

Commitment to protecting Eligible Whistleblowers

Probe is committed to the protection of genuine Whistleblowers against action taken in reprisal for the making of Protected Disclosures. If deemed appropriate, a Welfare Manager from the People Team will be appointed to support the Whistleblower.

An Eligible Whistleblower who is a current or former Probe employee can access Probe's confidential Employee Assistance Program in the event they require support and assistance in connection with a disclosure.

While Probe may not be able to provide the same level of practical support to other Whistleblowers, we will look at ways to provide support to the extent reasonably possible.

Whistleblower confidentiality

There is no requirement for a Whistleblower to disclose their identity in order to receive protection. During an investigation, Probe will take all reasonable steps to protect the identity of the Whistleblower.

Probe acknowledges it is an offence to disclose the identity of a Whistleblower (without consent) unless to the Australian Securities and Investments Commission (ASIC), the Australian Prudential Regulation Authority (APRA), the Tax Commissioner or the Australian Federal Police (AFP) or a lawyer for the purposes of obtaining legal advice or representation.

The failure to protect a Whistleblower's identity may result in fines, penalties and imprisonment.

Upon receiving a disclosure of Misconduct under this policy, Probe will only share the disclosers identity or information likely to reveal their identity if:

i. the discloser consents in writing;
ii. Probe is required by law to identify the discloser to relevant authorities;
iii. the matter is raised with lawyers for the purpose of obtaining legal advice or representation in support of the investigation; or
iv. disclosure is necessary to prevent or lessen a threat to a person’s health, safety or welfare.

During an investigation PROBE Group may disclose information that could lead to the discloser being identified, but it will take reasonable steps to reduce this risk.

Any disclosures regarding identity or information likely to reveal the identity of the discloser will be made on a strictly confidential basis.

In addition, Probe provides a confidential means to make Protected Disclosures without revealing their identity through the external STOPline service

Protection of files and records

All files and records created from an investigation will be retained securely.

Unauthorised release of information to someone not involved in the investigation (other than senior managers or directors who need to know to take appropriate action, or for corporate governance purposes) will be a breach of this policy, unless the discloser has otherwise consented.

Detrimental action

Probe is committed to protecting Eligible Whistleblowers, and other persons, from detrimental conduct, or threats of detrimental conduct, because a person believes or suspects that the Eligible Whistleblower (or another person) has made, may have made, proposes to make, or could make a disclosure that qualifies for protection under this policy.

A person cannot:

a. engage in conduct that causes detriment to an Eligible Whistleblower, or another person, if:
    i. the person believes or suspects that the Eligible Whistleblower (or another person) made, may have made, proposes to make, or could make, a disclosure that qualifies for protection under Part A or B of this policy; and
    ii. the belief or suspicion is the reason, or part of the reason, for the conduct.
b. threaten to cause detriment to an Eligible Whistleblower (or another person) in relation to a disclosure that qualifies for protection under applicable whistleblower protection laws (see

Part A and B).

All reasonable steps will be taken to ensure an Eligible Whistleblower will not be subject to any detriment which includes (without limitation) any of the following as a result of making a Protected Disclosure under this policy:

- Dismissal
- 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
- 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
- Any other damage to a person

as a result of making a Protected Disclosure.

The failure to comply with these obligations may result in fines, penalties and imprisonment.

Reasonable management and administrative action conducted in a reasonable manner by Probe will not constitute detrimental conduct against a whistleblower or another person, including (but not limited to):

- Management or administrative action taken to protect the whistleblower or another person from detriment; and
- Performance management or disciplinary processes conducted in accordance with Probe's policies and procedures.

If an Eligible Whistleblower is subjected to detrimental treatment as a result of making a disclosure under this policy they should inform a Protected Disclosure Officer immediately so appropriate action can be taken.

It is both a criminal and civil penalty offence to engage in detrimental conduct due to a belief or suspicion that a qualifying or protected disclosure has been made, is believed to have been made, or could be made.

Keeping the Whistleblower informed

Where possible, and assuming the identity of the person making the disclosure is known, the Whistleblower Investigations/Disclosure Officer or STOPline will ensure the Whistleblower is kept informed of the progress and outcomes of the investigation, subject to privacy and confidentiality considerations where Probe or STOPline determine a response is required or appropriate.

Other Protections Available to Eligible Whistleblowers Whistleblower

Where an eligible whistleblower makes a disclosure that qualifies for protection under the Corporations Act 2001 (Cth) or Tax Act, the Whistleblower is protected from any of the following in relation to the disclosure:

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

The protections available to whistleblowers who make a disclosure qualifying for protection under the *Corporations Act 2001* (Cth) and the Tax Act do not, however, grant the whistleblower immunity for any misconduct the whistleblower has engaged in that is revealed in their disclosure.

Whistleblowers may also have access to other statutory protections under anti-discrimination and equal opportunity legislation, and the *Fair Work Act 2009* (Cth), or under the common law and their contracts of employment or engagement with Probe.

Duty to Disclose Misconduct

It is expected that Probe employees who become aware of actual cases of Reportable Misconduct, or who suspect (on reasonable grounds) potential cases of Reportable Misconduct, will make a disclosure under this policy.

General Reporting

Each quarter a report is made to the Chief Executive Officer summarising the Whistleblowing activities for the period and to enable Probe to identify any systemic issues across its businesses. This report may be used to make general proposals to improve the compliance culture of Probe.

The Chief Executive Officer presents this report to the Board. Board Reports will be made on a 'no names' basis, maintaining the confidentiality of matters raised under this policy and, crucially, the discloser of Reportable Misconduct.

Availability of Policy

This policy will be available on Probe's intranet which includes a link to STOPline, Probe's website, incorporated into the online employee induction training for new employees, and is available in hard copy upon request. Eligible Recipients receive periodic training to ensure they understand their obligations under this policy and all Probe employees complete annual online training in connection with their whistleblowing rights and obligations.

Review of Policy

Probe is committed to monitoring and reviewing the effectiveness of this policy and its related processes and procedures. This policy will be reviewed at least every two years by the Group General Counsel and Group Executive, People Experience to ensure it complies with relevant laws and remains relevant and effective.

This policy does not impose any contractually binding obligations on Probe or create contractual rights for employees. Probe reserves the right to vary this policy from time to time at its discretion.

Breaches of Policy

Disclosers are assured that a release of information in breach of this policy will be regarded as a serious matter and will be dealt with in accordance with Probe Group's disciplinary procedures. In particular, any breach of confidentiality of the information provided by an Eligible Whistleblower, or an Eligible Whistleblower's identity, and any retaliation against a whistleblower, will be taken seriously and if appropriate will be separately investigated.

An individual who is found to have disclosed the information or to have retaliated (or threatened to retaliate) against an Eligible Whistleblower may be subject to further action (including disciplinary action in the case of employees). An individual may also be exposed to criminal or civil liability for a breach of relevant legislation.

The making of any malicious, vexatious or untrue report of Misconduct that, on investigation, is shown to be without foundation, will be treated as a serious matter in accordance with the workplace conduct policy. For the avoidance of doubt, where a person makes a report of Misconduct and:

- believes on reasonable grounds that the information is true; or
- is not in a position to form a belief on reasonable grounds about the truth of the information but believes on reasonable grounds that the information may be true and is of

sufficient significance to justify its disclosure so that the truth may be investigated that disclosure will not be deemed to be malicious for the purposes of this policy.

Probe reserves the right not to investigate reports that it considers to be malicious, vexatious or knowingly untrue.

Administration

This Policy is not a term of any contract, including any contract of employment, and does not impose any contractual duties, implied or otherwise, on any Probe entity and may be amended at any time.

References

Treasury Laws Amendment (Whistleblower Protections) Act 2019 (Act)

Code of Ethics and Conduct

Workplace Conduct and Performance Policy

Definitions

Eligible Whistleblower	For the purpose of this policy, an Eligible Whistleblower is defined as an individual who is, or has been, any of the following in relation to Probe: • a director or officer; • a permanent, temporary, casual, part-time or full-time employee; • a contractor (including employees of contractors); • a supplier (including employees of a supplier); • an associate; • a worker on secondment or supplied by an agency; • a trainee and apprentice; • a spouse, relative or dependent of any of the above categories; or • an individual prescribed by law as an Eligible Whistleblower; and

	• who whether anonymously or not, makes or attempts to make a protected disclosure regarding Misconduct. The Eligible Whistleblower must refer to this policy or request protections under this policy when making a disclosure.
Protected Disclosure	For the purpose of this policy, protected disclosure is defined as: • "Any communication based on reasonable grounds that discloses or demonstrates an intention to disclose information that may evidence Misconduct or such other reportable conduct that is described as a Protected Disclosure in an Appendix to this policy under a law that applies to the geographic location in which the discloser is based." This Policy does not apply to a disclosure of information by an individual to the extent that the information disclosed concerns a personal work-related grievance of the discloser unless the disclosure concerns alleged victimisation under this Policy. Personal work related grievances are managed under separate mechanisms and policies.

Document Information

Change history

Version	Date	Change	Author	Reviewer(s)*
1.0	25-June-18	First Probe Version	D Reid	J Zaharopoulos/ E Parks
2.0	6-May-19	Amendment to include STOPline details, mandatory content to comply with the Treasury Laws Amendment (Whistleblower Protections) Act 2019 (Act) and	J Zaharopoulos	D Reid

		changed title from "Doing the Right Thing Policy."		
3.0	25-Aug-20	Annual review - update to contact details	J Zaharopoulos	
4.0	2-Mar-21	Rebrand to Probe CX	Eve Dani	
5.0	12-Jan-22	Annual review	Madeleine Hearn	J Zaharopoulos
6.0	15-June-23	Review and update to Whistleblower Investigation Officer	J Zaharopoulos	
7.0	24-May-24	Annual review	J Zaharopoulos	
8.0	23-Dec-25	Annual review	M Hearn / R Daclan	J Zaharopoulos
9.0	22 July 2026	Review and update to Whistleblower Investigation Officer	M Hearn	J Zaharopoulos

All hard copies of this document are uncontrolled.

Appendix 1 - Australian Whistleblowers Protection Laws

Purpose

In Australia, the Corporations Act 2001 (Cth) (Corporations Act) and the Taxation Administration Act 1953 (Cth) (Taxation Administration Act) both provide protections for persons who make an eligible disclosure.

The purpose of this Appendix is to ensure Probe's Australian entities (Probe Contact Solutions Australia Pty Ltd, Convai Pty Limited, Probe Asia Pacific Pty Ltd, Beepo Support Services Pty Ltd, Probe Customer Management Pty Ltd and Probe Group Holdings Pty Ltd) comply with the Australian Whistleblower Protection Laws that are designed to:

- Avoid fraud and corporate wrongdoing;
- Promote the reporting of fraud and corporate wrongdoing whilst protecting Eligible Whistleblowers from discrimination; and
- Maintain Whistleblower confidentiality.

This Appendix applies when:

1. The whistleblower is an Eligible Whistleblower; and
2. Their disclosure is made to an Eligible Recipient; and
3. The disclosure is a Protected Disclosure.

The circumstances to determine whether there is a Protected Disclosure made by an Eligible Whistleblower to an Eligible Recipient are set out in Part A (Special Protections under the Corporations Act) and Part B (Special Protections under the Taxation Administration Act) of this Appendix.

Disclosures that are not Protected Disclosures do not qualify for protection under the Whistleblower Protection Laws. Non-qualifying disclosures may however be protected under other legislation, such as in Australia the Fair Work Act 2009 (Cth). Further non-qualifying disclosures may still fall within Probe's broader Policy Whistleblowing for investigating alleged wrongdoing.

It is recommended that potential whistleblowers seek the advice of an independent legal adviser before making a disclosure to a regulator or other permitted persons, including when making a Public Interest Disclosure or an Emergency Disclosure as outlined in this Appendix.

It is important that a potential whistleblower understands the criteria for protection under the relevant legislation.

Scope

This Appendix applies to Probe employees, contractors, directors and other persons identified in this Appendix as it relates to Probe's Australian entities (Probe Contact Solutions Australia Pty Ltd, Probe Operations Pty Ltd. Convai Pty Limited, Probe Asia Pacific Pty Ltd, Beepo Support Services Pty Ltd, Probe Customer Management Pty Ltd and Probe Group Holdings Pty Ltd).

References to Probe in this Appendix are directly referring to Probe's Australian entities.

Part A

Special Protections under the Corporations Act [1]

The Corporations Act gives special protection to disclosures about any misconduct or improper state of affairs relating to Probe if the following conditions are satisfied:

a. the whistleblower is or has been:

   i. an officer or employee of Probe;
   ii. an individual who supplies goods or services to Probe or an employee of a person who supplies goods or services to Probe;
   iii. an individual who is an associate of Probe; or
   iv. a relative, dependant or dependant of the spouse of any individual referred to at (i) to (iii) above,

(all being 'Eligible Whistleblowers');

b. the disclosure is made to:
   i. a Probe Protected Disclosure Officer;
   ii. an officer or senior manager of Probe [2];
   iii. Probe's external auditor (or a member of that audit team)[3];
   iv. an actuary of a Probe [4];
   v. the Australian Securities & Investments Commission (ASIC);
   vi. the Australian Prudential Regulation Authority (APRA); or
   vii. a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions in the Corporations Act (all being 'Eligible Recipients'); and

c. the Eligible Whistleblower has reasonable grounds to suspect that the information being disclosed concerns misconduct, or an improper state of affairs or circumstances in relation to Probe. This may include a breach of legislation including the Corporations Act, an offence against the Commonwealth punishable by imprisonment for 12 months or more, or conduct that represents a danger to the public or financial system,

(being a 'Protected Disclosure').

Examples of conduct which may amount to a breach of the Corporations Act include: insider trading, insolvent trading, breach of the continuous disclosure rules, failure to keep accurate financial records, falsification of accounts, failure of a director or other officer of Probe to act with the care and diligence that a reasonable person would exercise, or to act in good faith in the best interests of the corporation or failure of a director to give notice of any material personal interest in a matter relating to the affairs of Probe.

d. The protections given by the Corporations Act when these conditions are met are:
   i. the Eligible Whistleblower is immune from any civil, criminal or administrative legal action (including disciplinary action) for making the Protected Disclosure;
   ii. no contractual or other remedies may be enforced, and no contractual or other right may be exercised, against the Eligible Whistleblower for making the Protected Disclosure;

iii. in some circumstances, the reported information is not admissible against the Eligible Whistleblower in criminal proceedings or in proceedings for the imposition of a penalty[5];

iv. anyone who causes or threatens to cause detriment to a Eligible Whistleblower or another person in the belief or suspicion that a Protected Disclosure has been made, or may have been made, proposes to or could be made, may be guilty of an offence and may be liable for damages;

v. an Eligible Whistleblower's identity cannot be disclosed to a Court or tribunal except where considered necessary; and

vi. the person receiving the Protected Disclosure commits an offence if they disclose the substance of the disclosure or the Eligible Whistleblower’s identity, without the Eligible Whistleblower’s consent, to anyone except ASIC, APRA, the Australian Federal Police (AFP) or a lawyer for the purpose of obtaining legal advice or representation in relation to the disclosure.

Confidentiality

If a Protected Disclosure is made, the identity of the Eligible Whistleblower must be kept confidential unless one of the following exceptions applies:

a. the Eligible Whistleblower consents to the disclosure of their identity;

b. disclosure of details that might reveal the Eligible Whistleblower’s identity and is reasonably necessary for the effective investigation of the matter;

c. the concern is reported to ASIC, APRA, or the AFP; or

d. the concern is raised with a lawyer for the purpose of obtaining legal advice or representation.

Public Interest and Emergency Disclosure

An Eligible Whistleblower may also be eligible to make a Protected Disclosure that qualifies for protection under the Whistleblower Protection Laws to a journalist or to a “Member of Parliament” (being a Member of an Australian Commonwealth or State Parliament or an Australian Territory Legislature) – provided the criteria set out below under the heading “Public Interest Disclosure” are met.

An Eligible Whistleblower will only qualify for protection if they have previously made a Protected Disclosure to ASIC, APRA, or another Commonwealth body prescribed.

Note: Public Interest and Emergency Disclosures do not apply to the Australian Tax Office (ATO) in respect of tax affairs.

Public Interest Disclosure

A Public Interest Disclosure is a Protected Disclosure made to a journalist or Member of Parliament where:

a. at least 90 days have passed since the previous making of a Protected Disclosure to ASIC, APRA or another prescribed Commonwealth body;
b. the Eligible Whistleblower does not have reasonable grounds to believe that action has been, or is being taken in relation to their Protected Disclosure;
c. the Eligible Whistleblower has reasonable grounds to believe that making a further disclosure is in the public interest;
d. the Eligible Whistleblower has given prior written notice to ASIC or APRA, or the Commonwealth body to which they made their previous Protected Disclosure, outlining that they intend to make a Public Interest Disclosure and providing sufficient information so as to identify their previous Protected Disclosure; and
e. the extent of the information disclosed in the Public Interest Disclosure is no greater than to inform the journalist or Member of Parliament of the misconduct or improper state of affairs or circumstances, or other conduct falling within the scope of the Whistleblower Protection Laws.

Emergency Disclosure

An Emergency Disclosure is a disclosure made to a journalist or Member of Parliament where:

a. a Protected Disclosure has previously been made to ASIC, APRA, or another prescribed Commonwealth body;
b. the Eligible 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;
c. the Eligible Whistleblower has given prior written notice to the Commonwealth body to which they made their previous Protected Disclosure, outlining that they intend to make an Emergency Disclosure and providing sufficient information so as to identify the previous Protected Disclosure; and
d. only includes information to the extent necessary to inform the journalist or Member of Parliament of the substantial and imminent danger is disclosed.

Part B

Special Protections under the Taxation Administration Act

The Taxation Administration Act gives special protection to disclosures about a breach of any

Australian tax law by Probe or misconduct in relation to Probe's tax affairs if the following conditions are satisfied:

a. the whistleblower is or has been:

   i. an officer or employee of Probe;

   ii. an individual who supplies goods or services to Probe or an employee of a person who supplies goods or services to Probe;

   iii. an individual who is an associate of a Probe;

   iv. a spouse, child, dependant or dependant of the spouse of any individual referred to at (i) to (iii) above,

(all being 'Eligible Whistleblowers');

b. the disclosure is made to:

   i. a Probe Protected Disclosure Officer;

   ii. a director, secretary or senior manager of Probe;

   iii. any Probe external auditor (or a member of that audit team)[6];

   iv. registered tax agent or BAS agent who provides tax or BAS services to Probe [7];

   v. any other employee or officer of Probe who has functions or duties relating to tax affairs of Probe (e.g. an internal accountant);

   vi. the Commissioner of Taxation (Tax Commissioner); or

   vii. a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions in the Taxation Administration Act

(all being 'Eligible Recipients'); and

c. if the disclosure is made to a Probe recipient, the Eligible Whistleblower:

   i. 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 a Probe or an associate of Probe; and

   ii. considers that the information may assist the Probe recipient to perform functions or duties in relation to the tax affairs of a Probe or an associate of Probe; and

d. if the disclosure is made to the Tax Commissioner, the Eligible Whistleblower considers that the information may assist the Probe recipient to perform functions or duties in relation to the tax affairs of a Probe or an associate of Probe (being a 'Protected Disclosure').

The protections given by the Taxation Administration Act when these conditions are met are:

a. the Eligible Whistleblower is immune from any civil, criminal or administrative legal action (including disciplinary action) for making the disclosure;
b. no contractual or other remedies may be enforced, and no contractual or other right may be exercised, against the Eligible Whistleblower for making the disclosure;
c. where the Protected Disclosure was made to the Tax Commissioner, the reported information is not admissible against the Eligible Whistleblower in criminal proceedings or in proceedings for the imposition of a penalty, except where the proceedings are concerned with whether the information is false;
d. unless the Eligible Whistleblower has acted unreasonably, an Eligible Whistleblower cannot be ordered to pay costs in any legal proceedings in relation to a disclosure;
e. anyone who causes or threatens to cause detriment to an Eligible Whistleblower or another person in the belief or suspicion that a disclosure has been made, or may have been made, proposes to or could be made, may be guilty of an offence and liable to pay damages;
f. an Eligible Whistleblower's identity cannot be disclosed to a Court or tribunal except where considered necessary; and
g. the person receiving the disclosure commits an offence if they disclose the substance of the disclosure or the Eligible Whistleblower's identity, without the their consent, to anyone except the Tax Commissioner, the AFP or a lawyer for the purpose of obtaining legal advice or representation in relation to the disclosure.

Confidentiality

If a Protected Disclosure is made, the identity of the Eligible Whistleblower will be kept confidential unless one of the following exceptions applies:

a. the Eligible Whistleblower consents to the disclosure of their identity;
b. disclosure of details that might reveal the Eligible Whistleblower's identity is reasonably necessary for the effective investigation of the allegations;
c. the concern is reported to the Tax Commissioner or the AFP; or
d. the concern is raised with a lawyer for the purpose of obtaining legal advice or representation.

[1] See Part 9.4AAA of the Corporations Act 2001 (Cth).

[2] Officer and senior manager are defined in the Corporations Act as "a director, or senior manager who makes, or participates in make decisions that affect the whole, or substantial

part, of the business of Probe, or who has the capacity to affect significantly Probe's financial holding."

[3] Probe's external auditor at 22 July 2026 is PricewaterhouseCoopers, Jason Perry, Lead Auditor contact - Ethics and Conduct Helpline 1800 I TRUST (1800 487 878).

[4] Probe's actuary at 22 July 2026 is PricewaterhouseCoopers, Jason Perry, Lead Auditor contact - Ethics and Conduct Helpline 1800 I TRUST (1800 487 878).

[5] Such as where the disclosure has been made to ASIC or APRA, or where the disclosure qualifies as a public interest or emergency disclosure.

[6] Probe's external auditor at 22 July 2026 is PricewaterhouseCoopers, Jason Perry, Lead Auditor contact - Ethics and Conduct Helpline 1800 I TRUST (1800 487 878)

[7] Probe's tax agent at 22 July 2026 is PricewaterhouseCoopers, Fletcher Dixon, Lead Auditor contact - Ethics and Conduct Helpline 1800 I TRUST (1800 487 878).