
SelfWealth.[®]

SelfWealth Ltd

Whistleblower Protection Policy

Document Version History

Version	Date	Updated by	Next Review Date
Draft	September 2019	Compliance Officer	October 2020
1.0	December 2019	Compliance Officer	December 2020

Review and Approval Schedule

The Compliance officer is responsible for the review and updating this Policy. The review of this Policy will be included in the SelfWealth Policy and Procedure Document Register.

The Policy will be submitted for approval to the Audit and Risk Committee.

Distribution of Policy

On approval this policy will disseminated to the following:

SelfWealth Corporate website

SelfWealth Personnel

Earlier version of this policy will be archived and removed from all corporate sites and shared staff folders.

Whistle-blower Protection Policy

December 2019

1. Introduction

At SelfWealth Ltd (SelfWealth) we are committed to fostering a culture of good corporate governance and ethical behaviour. We believe the best way of maintaining this culture is through a working environment in which current and past officers, employees and contractors of SelfWealth and their relatives (SelfWealth Personnel or a SelfWealth Staff Member) are able to report instances of Unacceptable Conduct without fear of victimisation or reprisal.

This Policy provides SelfWealth Personnel with a mechanism for addressing any concerns they may have about our operations and activities to ensure that SelfWealth:

- (a) effectively manage our operations;
- (b) comply with the relevant laws and SelfWealth policies and procedures;
- (c) prevent undesirable and unlawful conduct from occurring;
- (d) manage financial and governance issues efficiently;
- (e) comply with international trade sanctions, standards and conventions; and
- (f) provide a healthy and safe working environment for SelfWealth Personnel.
- (g) deter wrongdoing, promote better compliance with the law and promote a more ethical culture, by increasing awareness that there is a higher likelihood that wrongdoing will be reported.

This Policy covers the procedures for reporting Unacceptable Conduct and addresses the protection which is afforded to SelfWealth Personnel who make a report in accordance with this Policy.

This Policy reflects the requirements of the Australian Standard on Whistleblower Protection Programs for Entities (AS 8004-2003)

Note:

It is not the intention to restrict SelfWealth Personnel from raising issues and discussing concerns with appropriate supervisors or with our directors and senior managers.

2. UNACCEPTABLE CONDUCT and REASONABLE SUSPICION of UNACCEPTABLE CONDUCT

This Policy applies to all SelfWealth Personnel who wish to report Unacceptable Conduct, or on reasonable suspicion of Unacceptable Conduct.

Unacceptable Conduct means conduct by a person who relates to SelfWealth or any of SelfWealth's customers, suppliers, subcontractors and other entities with whom SelfWealth has a business relationship, which, in the view of a SelfWealth Staff Member, is:

- (a) illegal, dishonest, fraudulent or corrupt;
- (b) in breach of any Commonwealth or State legislation or any other principle of law or equity;
- (c) in breach of any applicable industry practices;
- (d) unethical;
- (e) gross mismanagement;
- (f) a serious waste of resources or a breach of environmental practice;
- (g) an unsafe work-practice;
- (h) serious improper conduct;
- (i) in breach of this SelfWealth Code of Conduct or any other SelfWealth policy or procedure;
- (j) in breach of any international trade sanction, standard or convention;
- (k) conduct which may cause financial or non-financial loss to SelfWealth or be otherwise detrimental to the interests of SelfWealth; or
- (l) presents a danger to the public or financial system.

3. PROTECTION

3.1 Protection generally

SelfWealth are committed to the protection SelfWealth Personnel who report Unacceptable Conduct, to any persons detailed under Roles and Responsibilities, under this policy will not be personally disadvantaged or suffer any detriment by:

- (a) dismissal;
- (b) demotion;
- (c) any form of victimisation or harassment;
- (d) discrimination;
- (e) harm or injury, including psychological harm;
- (f) damage to personal property, reputation, business or financial position;
- (g) current or future bias; or
- (h) other damage.

If a SelfWealth Staff Member considers they have suffered any of the above disadvantages as a result of making a report, the SelfWealth Staff Member should contact the Whistleblower Protection Officer. The Whistleblower Protection Officer will assist the SelfWealth Staff Member to appeal to the SelfWealth Executive Leadership Team or its delegate in respect of the disadvantage or detriment (Corp Act s1317AI(5)(a)).

3.2 Confidentiality

The SelfWealth Member's anonymity will be protected (Corp Act S1317AAE) if they do not wish their identify to be disclosed to the Whistleblower Protection Officer or Whistleblower Investigations Office.

All information concerning a report of Unacceptable Conduct will be held in the strictest confidence and will not be disclosed to a person who is not connected with the investigation unless:

- (a) the SelfWealth Staff Member who made the report consents in writing to the disclosure;
- (b) the disclosure is required by law; or
- (c) the disclosure is:
- (d) to a professional legal advisor on a confidential basis for the purposes of seeking legal

advice; and

- (e) necessary for the purposes of obtaining appropriate legal advice in relation to Unacceptable Conduct.

3.3 False disclosures

Where it is determined by an investigation that a SelfWealth Staff Member has made a false report of Unacceptable Conduct or with reckless disregard as to the truth or falsifies the contents of the report, the SelfWealth Staff Member's conduct will be considered a serious breach of this Policy and the SelfWealth Staff Member may be subject to disciplinary proceedings.

4. ROLES AND RESPONSIBILITIES

All persons/roles detailed below are obligated to ensure that the rights and protections of SelfWealth Personnel under this Policy and applicable legislation are upheld in relation to each report of Unacceptable Conduct.

4.1 Personnel

All SelfWealth Personnel have an important role to play in supporting those who have made a report of Unacceptable Conduct. They must refrain from any activity that is, or could be perceived to be, victimisation or harassment of a person who makes a disclosure. Furthermore, they should protect and maintain the confidentiality of a person they know or suspect to have made a disclosure.

4.2 Eligible SelfWealth Persons

A report of Unacceptable Conduct may be made to a SelfWealth officer (Board members), senior manager, auditors or actuaries (together, Eligible SelfWealth Persons). With the consent of the SelfWealth Person, the Eligible SelfWealth Person is obligated to report the unacceptable conduct to the Whistleblower Protection Officer

4.3 Whistleblower Protection Officer

It is the responsibility of the Whistleblower Protection Officer to:

- (a) Receive reports of Unacceptable Conduct
- (b) Safeguard the interests of Whistleblowers

- (c) Ensure the rights of the SelfWealth Member under this Policy and applicable legislation are complied with in relation to each report of Unacceptable Conduct.

4.4 Whistleblower Investigations Officer

It is the responsibility of the Whistleblower Investigations Officer to:

- (a) Investigate all reports of Unacceptable Conduct.
- (b) Ensure all investigations are conducted in accordance with this Policy.

Note: The office of the Whistleblower Protections Office and the Whistleblower Investigations Officer

- (a) *will not be held by the same person*
- (b) *will have direct, unfettered access to independent financial, legal and operational advice as required for the purpose of effectively carrying out their duties under this Policy.*

5. MAKING A REPORT OF UNACCEPTABLE CONDUCT

SelfWealth Personnel making a report of Unacceptable Contact must have formed a reasonable view that there has been Unacceptable Conduct and are encouraged to report, internally first via the processes and channels outlined in this Policy before considering whistleblowing externally. Accordingly, SelfWealth have 2 internal channels to report any Unacceptable Contact.

5.1 – Internal Reporting Channels

Eligible SelfWealth Persons

SelfWealth Personnel may wish to raise the concern of Unacceptable Conduct to another SelfWealth staff member. As outlined under roles and responsibility a report of Unacceptable Conduct will be escalated to the Whistleblower Protection officer, on the consent of the SelfWealth Personnel making the report of Unacceptable Conduct.

SelfWealth Personnel, if they feel appropriate may raise their concerns of Unacceptable Conduct with the Chairman of the SelfWealth Board.

Whistleblower Protection Officer

Where SelfWealth Personnel do not wish report the conduct to the Eligible SelfWealth Persons and to ensure the SelfWealth Personnel are protected from victimisation or reprisal they may report the conduct to the Whistleblower Protection Officer.

Our Whistleblower Protection Officer is Daniel Knight at K&L Gates Lawyers

The Whistleblower Protection Officer can be contacted via email or anonymously via telephone or post

Telephone: (03) 9205 2000

Email: daniel.knight@klgates.com

Postal Address: 25/525 Collins Street, Melbourne Vic 3000

The Whistleblower Protection Officer will ensure that all telephone calls are conducted in private and that all emails are kept confidential.

SelfWealth Personnel wishing to meet with the Whistleblower Protection Officer away from the workplace should contact the Whistleblower Protection Officer to arrange a meeting as appropriate.

5.2 – External Reporting Channels

Reporting to a regulator

Any report of Unacceptable Conduct may be made to the Australian Securities and Investments Commission (ASIC) or the Australian Federal Police (AFP).

Suggestion to include ASIC's details here.

Emergency reporting

As a final and emergency measure, SelfWealth Personnel may report Unacceptable Conduct to a member of Parliament or a journalist, if:

- (a) the SelfWealth Staff Member has previously reported the Unacceptable Conduct to ASIC;
- (b) after 90 days, or sooner if they reasonably believe that to do so is the appropriate action, the SelfWealth Staff Member has reasonable grounds to believe that action is not, or has not been, taken to address the Unacceptable Conduct;
- (c) the SelfWealth Staff Member has reasonable grounds to believe there is an imminent risk of serious harm or danger to the public health or safety, or to the financial system, if the

Unacceptable Conduct is not acted on immediately; and

- (d) after the end of the 90-day period, the SelfWealth Staff Member gives ASIC a written notification that he or she intends to make an emergency disclosure of the Unacceptable Conduct.

6. INVESTIGATIONS

6.1 Conducting investigations

Investigations into reports of Unacceptable Conduct will be conducted by the Whistleblower Investigations Officer.

The Whistleblower Investigations Officer is Scott Barlow who may be contacted on (02) 6693 3502

If the Whistleblower Investigations Officer is also conflicted, SelfWealth will appoint an independent third party to conduct the investigation.

The Whistleblower Protection Officer will provide details of each report of Unacceptable Conduct which he or she receives to the Whistleblower Investigations Officer on a confidential basis. The Whistleblower Investigations Officer will then investigate the Unacceptable Conduct.

The objective of such an investigation is to locate evidence that either substantiates or refutes the claims made in the report.

All investigations will be conducted in accordance with the principles of “natural justice”. This means that investigations will be conducted without bias and all parties will be given adequate notice of meetings to discuss the issues raised and have time to prepare. All parties will be given the opportunity to be heard and will have the right to representation.

In the interests of objectivity and the perception of objectivity, the Whistleblower Investigations Officer will consider employing external investigators in relation to an investigation, particularly where the investigation concerns allegations of serious Unacceptable Conduct.

6.2 Action to be taken

Once an investigation is completed, the Whistleblower Investigations Officer will report the findings of the investigation to the Whistleblower Protections Officer.

If the Whistleblower Protection Officer is satisfied that the Unacceptable Conduct has occurred, the Whistleblower Protection Officer will make a recommendation, depending on the circumstances of

the Unacceptable Conduct, to either the Chief Executive Officer or the Chairperson of SelfWealth as to the action which should be taken.

If the Whistleblower Protection Officer is not satisfied that the Unacceptable Conduct has occurred, the Whistleblower Protections Officer will provide a report of the findings of the investigation, depending on the circumstances of the Unacceptable Conduct, to either the Chief Executive Officer or Chairperson of SelfWealth.

If the Whistleblower does not feel that the investigation carried out by the Whistleblower Investigation Officer is conclusive, they have the right to whistle blow externally.

6.3 Feedback

A SelfWealth Staff Member who has made a report of Unacceptable Conduct will be advised within 20 working days of making the report:

- (a) whether an investigation has been undertaken;
- (b) whether the investigation has been completed; and
- (c) what action is to be taken to address the Unacceptable Conduct, subject to any applicable confidentiality, privacy and other relevant considerations.

7. INDUCTION AND TRAINING

Each SelfWealth Staff Member will be made aware and have access to this Policy and the mechanisms for the reporting of Unacceptable Conduct through SelfWealth's induction and training programs.

Training of the whistleblower policy will be included the in annual compliance training program to be launched in 2020.

8. REVIEW

We will review this Policy on a regular basis or in line with any regulatory updates and will make any amendments deemed necessary to protect the interests of SelfWealth Personnel and improve the effectiveness of this Policy