Whistleblower Policy

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1. Overview / Purpose

We are committed to creating and maintaining an open working environment where everyone feels safe and secure to raise concerns without fear of retaliation or victimisation. PEXA is committed to enabling a culture where you feel safe and where it's easy to speak up about things that are of concern. The purpose of the Whistleblower Policy (Policy) is to provide clear principles on how we approach and manage Whistleblower Disclosures in Australia / Protected Disclosures in the UK (Disclosures).

2. Scope – does this policy impact me?

- Employees or other personnel or representatives at all levels and grades, including non-executive directors, executive directors, senior executives, officers, and employees (whether permanent, fixed-term, casual, contracting, consulting or temporary), who are employed by act for or represent the PEXA Group ("Employees and Representatives").
- The PEXA Group includes PEXA Group Limited and each of its subsidiaries, including Digital Completion UK Ltd ("PEXA UK"), Optima Legal Services Ltd ("Optima"), and Smoove Ltd including the following wholly owned trading Subsidiary companies: United Legal Services Limited, Legal-Eye Limited, and Amity Law Limited ("Smoove").
- Service providers, contractors and suppliers of PEXA;
- Former employees; and
- A spouse, relative or dependent of any of the above.

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3. Definitions / Glossary

Term	Definition
Disclosable Matter	Any improper conduct or practice which is alleged or suspected (on reasonable grounds) to have occurred relating to: • An Illegal act, miscarriage of justice or breach of any law, regulation or code of conduct, policy or procedure applying to PEXA (including breach of employment laws) • a contract by an employee, contractor or director (e.g. deliberately passing sensitive or confidential PEXA information to a third party without authorisation); • a serious or system breach of any PEXA Policy, including Code of Conduct. • Corrupt or fraudulent conduct (such as misappropriation of funds, bribery / undue influence or facilitation of tax evasion) • Substantial mismanagement or wastage of PEXA resources and/or damage to the environment or wider public; • Conduct involving substantial risk to health or safety; • Conduct that may cause serious financial or non-financial loss to PEXA or damage to our employees, suppliers, customers, reputation and/or brand, or • Deliberate concealment relating to any of the above.
Eligible Recipient	An individual responsible for receiving disclosures that qualify for protection under the Act.
Reasonable Grounds	Means that a reasonable person in your position would also suspect the information indicates serious or systemic misconduct or a breach of the law.
The Act	*Corporations Act* 2001 (Cth) in Australia / Public Interest Disclosure Act 1998 in the UK
Whistleblower Discloser / Protected Disclosure	See individuals listed above under 'Scope'.
Whistleblower Disclosure	A 'Disclosable Matter' under the Act that specifically relates to the reporting of actual or suspected serious wrongdoing or systemic misconduct, unlawful or unethical behaviour, or conduct that may cause serious public harm.

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Whistleblowing	The deliberate, voluntary disclosure of individual or organisational wrongdoing by a person who has or had privileged access to data, events or information about an actual, suspected or anticipated wrongdoing within or by an organisation that is within its ability to control.

4. Policy Principles – the key things to take away

1. PEXA will treat all Disclosures seriously and with priority.
2. We have a mechanism to make a Disclosure effortlessly through our established Eligible Recipients.
3. To qualify for whistleblower protection, a Whistleblower Discloser must make a Disclosure to an Eligible Recipient which concerns a Disclosable Matter.
4. Disclosures can be made anonymously and treated confidentially and securely (and be protected under the Act).
5. PEXA will support and protect Whistleblower Disclosers from any possible detriment incurred by making a Disclosure.
6. We will assess every Disclosure diligently. At the end of the assessment, we will document the results to the Discloser and provide feedback internally for action and/or improvement.

7. Roles & Responsibilities specific to this policy

Responsible Area	Activities to be undertaken / completed
Group Executives	• Fostering an environment that supports the escalation, investigation and effective management of all Disclosures • Accountability for policy implementation and awareness
Line Manager	Ensure all employees are aware of how and when Disclosures can be made (including supporting training completion), in collaboration with our Eligible Recipients
PEXA's Eligible Recipients:	• Receipt of known or anonymous reports and ongoing management of Disclosures

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- Deloitte Whistleblower Service - PEXA Chief People Officer, People Experience (PX) - PEXA Chief Financial Officer, Group Finance - Group Non-Executive Director and Chair, Audit & Risk Committee - UK Non-Executive Director	• Appointing an appropriate individual/entity to investigate allegations in the Disclosure • Ensuring the investigation is conducted in a fair and timely manner and confidentiality is maintained • If requested by the Discloser, provide additional information about Policy application *before* a Disclosure is made • Where appropriate, involving and notifying external parties of the Disclosure, such as customers, the police or other agencies • Providing to the Discloser information on the outcome of the investigation where reasonably practicable • Ensuring no reprisals, harassment, discrimination, or victimisation of the Discloser occurs • Facilitate annual training of this Policy across PEXA through Learning and Development as per above • Advising the Risk and Compliance Committee (RCC) and the Audit & Risk Committee (ARC) of Disclosures, whilst exercising discretion in revealing the Disclosers identity and the level of detail to not compromise the investigation (if active)
Risk and Compliance Committee and Audit & Risk Committee	• Endorse changes to this Policy • Review all Disclosures (in line with confidentiality obligations)

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8. Policy Guidelines

5.1 Making a Disclosure

Before you make a Disclosure, there are some important matters that we would like to emphasise:

- Consistent with better practices, PEXA uses a third party, Deloitte, to receive Disclosures. We want to give individuals an external and independent process to submit Disclosures, rather than having to rely solely on existing PEXA channels.
- Whilst engaged by PEXA, Deloitte will always remain independent. Disclosures can be made via phone, website, email, fax, and post.
- When making a Disclosure through the Deloitte Whistleblower Service website, the Discloser will be provided with login details and be prompted to create a unique password. The login will enable access to communicate with Deloitte through the Platform. At this point the Discloser will be made aware of their ability to:
    - remain completely anonymous (or use a pseudonym); or
    - identify yourself to Deloitte only; or
    - identify yourself to both Deloitte and PEXA's Eligible Recipients.
- If the internal Eligible Recipient is involved in the matter being reported, they will be excluded from receiving or having access to it.
- Nothing in our contracts of employment or other agreements we enter into will prevent you from making a Disclosure.

You must make a Disclosure directly to one of the below Eligible Recipients to be able to qualify for protection.

Name	Deloitte Whistleblower Service
Phone	1800 173 918
Web	australia.deloitte-halo.com/PEXA
Email	whistleblower@deloitte.com.au
Postal	PEXA, Reply Paid 12628, A'Beckett Street, Melbourne, Victoria 8006

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Name	Ingrid Anderson, PEXA Chief People Officer, People Experience (PX)
Email	ingrid.anderson@pexa.com.au

Name	Graham Curtin, PEXA Chief Financial Officer, Group Finance
Email	graham.curtin@pexa.com.au

Name	Melanie Willis, Non-Executive Director and Chair, Audit & Risk Committee
Email	Melanie@melaniewillis.com

Name	John Hooper, UK Non-Executive Director
Email	john.hooper@pexa.com.au

5.2 When will Policy apply?

You should first consider whether your concern can be more appropriately escalated or effectively addressed under another PEXA policy or process. If your concern relates to a personal work-related matter such as an interpersonal conflict between yourself and another employee, inappropriate behaviour such as harassment or bullying, or other non-systemic issues of misconduct that do not have broader implications for PEXA, you should report your concern under the relevant policy to which it may apply.

For harassment, discrimination or bullying concerns, we advise you speak to your line manager initially (where appropriate) or our People Experience team at peopleadminau@pexa.com.au. Our People Experience team can help determine, and if necessary, escalate the complaint in line with this Policy. Concerns of this nature may also be escalated to our internal Eligible Recipients who are committed to assisting you, as well as advising whether the issue is a Disclosable Matter.

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A personal work-related grievance may still qualify for protection if information about that misconduct includes a personal work-related grievance (mixed report) or PEXA has engaged in conduct that represents a danger to the public. Where a personal work-related grievance has significant or broader implications for the PEXA Group or the matter relates to information that suggests systemic misconduct beyond your personal circumstances, it may quality for protection.

Essentially, we want you to speak up and call out issues or behaviour that doesn't feel right.

If your concern relates to a Disclosable Matter, and you have reasonable grounds to suspect it has occurred (or occurring), this Policy will support you to make a Disclosure without fear of reprisal and with the protection of PEXA. Provided that you are raising a genuine concern, it does not matter if you are mistaken and we don't expect you to wait for proof before raising concerns.

Disclosures that are not about Disclosable Matters do not qualify for protection. A Discloser can still qualify for protection even if their Disclosure turns out to be incorrect.

5.3 Whistleblower confidentiality

If an individual makes a Disclosure under this Policy, PEXA will endeavour to protect that individual's identity from disclosure. This may not occur if confidentiality is not a practical option. Generally, PEXA will not disclose the person's identity unless:

- The individual making the report consents to the disclosure;
- The disclosure is required or authorised by law; and/or
- The disclosure is necessary to further the investigation.

A Discloser can choose to remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised.

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At some point in time it may also be necessary to disclose the fact and the substance of a report to the person who is the subject of the report. While confidentiality is maintained, in some circumstances, the source of the reported issue may be obvious to a person who is the subject of a report.

Unauthorised disclosure of information relating to a report, the identity of a Discloser or information from which the identity of the Discloser could be inferred will be regarded seriously and may result in disciplinary action.

5.4 False, malicious or non-genuine claims

If you make a Disclosure and have reasonable grounds for believing the information disclosed indicates unlawful or improper conduct, but is found to be unsubstantiated following an investigation, no adverse action will be taken against you for making the Disclosure.

However, if you make a Disclosure that is malicious or deliberately upsetting, or about content that is knowingly false, you will be subject to investigation under our applicable disciplinary processes. A person who knowingly makes a false or misleading disclosure will not have any whistleblower protections.

5.5 Whistleblower protections will be in place

PEXA is committed to protecting and respecting the rights of all Disclosers in good faith. We will not tolerate any retaliatory action or threats of retaliatory action against any person who has made or who is believed to have made a Disclosure, or against that person's colleagues, employer (if a contractor) or relatives.

For example, the person will not be disadvantaged or victimised by having made the report by dismissal, demotion, any form of harassment, discrimination, current or future bias or associated threats.

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Any such retaliatory action or victimisation in reprisal for a report being made under this Policy will be treated as serious misconduct and may result in disciplinary action. If a person who makes a report is implicated in the Disclosure, that person must not be subjected to any actual or threatened retaliatory action or victimisation in reprisal for making a report under this Policy.

Disclosers are also entitled to other immunities and protections as a result of making a Disclosure, including:

- PEXA will not disclose the identity of a Discloser or information that is likely to lead to the identification of the Discloser. It is illegal for a person to identify a Discloser or disclose information that is likely to lead to the identification of the Discloser, outside of certain exceptions.
- A Discloser can seek compensation and other remedies if they suffer loss, damage or injury because of a Disclosure, and where PEXA failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.
- Protection against criminal, civil or administrative liability.

We will ensure that protections also apply to eligible Disclosures which are made to:

- The Australian Security and Investments Commission (ASIC), Australian Prudential Regulation Authority (APRA) or another Commonwealth body prescribed by regulation as well as UK regulators such as the Financial Conduct Authority (FCA) and Solicitors Regulation Authority (SRA).
- Legal practitioners for the purposes of obtaining legal advice or legal representation about the operation of whistleblower provisions in the Act.
- Protections will also apply to public interest and emergency disclosures.

Disclosures can be made to a journalist or parliamentarian in certain circumstances and qualify for protection – it's important for a Discloser to understand the criteria for making a public interest or emergency Disclosure. Such a Disclosure must have previously been made to ASIC, APRA or a prescribed body and written notice provided to the body to which the

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Disclosure was made. In the case of a public interest disclosure, at least 90 days must have passed since the previous Disclosure. A Discloser should contact an independent legal adviser before making a public interest disclosure or an emergency disclosure.

5.6 How we will investigate

All reports relating to Disclosable Matters will be properly assessed, and if appropriate, independently investigated with the objective of locating evidence that either substantiates or refutes the claims made by the Discloser.

Some things we may consider through our investigation process include:

- The nature and scope of the investigation;
- The person(s) within and/or outside the entity that should lead the investigation;
- The nature of any technical, financial or legal advice that may be required to support the investigation; and
- The investigation timeframe - we will endeavour to investigate as quickly as practicable, noting the timeframe may vary depending on the nature of the Disclosure.

The internal Eligible Recipients will be responsible for ensuring the proper conduct of the investigation, which may include appropriate instruction and oversight of a third party appointed to investigate. Initially, we will need to assess each Disclosure to determine whether it qualifies for protection and whether a more in-depth investigation is required.

The internal Eligible Recipients will keep the Discloser informed, where reasonably practical, of the outcomes of the investigation to their report subject to the considerations of privacy of those against whom the allegations have been made. We will ensure the fair treatment of all individuals who are mentioned in Disclosures that qualify for protection, or individuals subject of Disclosures. Measures will include (where applicable):

- Disclosures will be handled confidentially, when it is practical and appropriate in the circumstances;
- Each Disclosure will be assessed and may be the subject of an investigation;

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- The objective of an investigation is to determine whether there is enough evidence to substantiate or refute the matters reported;
- When an investigation needs to be undertaken, the process will be objective, fair and independent;
- An individual who is the subject of a disclosure may contact our support services (e.g. counselling).

If, following an investigation, the allegations are found not to be substantiated, then any documents relating to the investigation will be handled confidentiality. Findings from an investigation will be documented and reported to our Board, Group Executives, Risk and Compliance Committee and/or ARC, while preserving confidentiality, and if applicable to third parties such as customers, the police or other agencies.

5.7 How we will support and protect Disclosers

We will aim to reduce the risk that the Discloser will be identified from the information contained in a Disclosure.

When maintaining confidentiality and anonymity, we will apply the following approach:

- The Discloser will be referred to in a gender-neutral context;
- Where possible, the Discloser will be contacted to help identify certain aspects of their Disclosure that could inadvertently identify them;
- Disclosures will be handled and investigated by qualified staff;
- All paper and electronic documents and other materials relating to Disclosures will be stored securely;
- Access to all information relating to a Disclosure will be limited to those directly involved in managing and investigating the disclosure; and
- Only a restricted number of people who are directly involved in handling and investigating a Disclosure will be made aware of a Discloser's identity (subject to the discloser's consent) or information that is likely to lead to the identification of the Discloser.

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We are also committed to protecting a Discloser from any detriment. We will do this by:

- Assessing the risk of detriment against a Discloser and other persons (e.g. other staff who might be suspected to have made a Disclosure), which will commence as soon as possible after receiving a Disclosure;
- Offering PEXA support services such as EAP to Disclosers; and Implementing strategies to help a Discloser minimise and manage stress, time or performance impacts, or other challenges resulting from the Disclosure or its investigation.

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