FINDEX

Whistleblower Policy

Findex Group Limited and its related bodies corporate. Applies in Australia and New Zealand.

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1. Purpose

Whistleblower laws exist to encourage people to report wrongdoing without fear of reprisal. Findex Group Limited and its bodies corporate ("Findex" or "Findex Group") are committed to the highest standards of ethical and fair business conduct, and to a culture where every person feels safe to speak up.

Speaking up protects Findex's clients, our people, and the integrity of the profession we work in. Findex expects every Employee, partner, officer and contractor to speak up when they see wrongdoing, including through the channels below, and to never be a bystander to it. Non-retaliation against anyone who speaks up in good faith is a leadership commitment, not only a legal one.

This Whistleblower Policy ("Policy") sets out how Findex receives, investigates and resolves reports of wrongdoing, and the protections and support available to the person who raises them. The objectives of this Policy are to:

- encourage reporting of wrongdoing
- protect the identity of the Whistleblower and the confidentiality of the information provided
- protect Whistleblowers against victimisation and detriment, including threats of either
- ensure transparency, fairness and natural justice in how reports are handled
- ensure every disclosure is taken seriously and investigated appropriately.

This Policy is one of a number of policies that promote a culture of compliance, honesty and ethical behaviour at Findex, and is a key part of a transparent, accountable and safe work culture.

2. Scope

This Policy is a Findex Group-wide policy and applies in Australia and New Zealand.

Findex Group Limited is the entity bound by the mandatory policy requirement in section 1317AI of the Corporations Act 2001 (Cth). This Policy is applied as a Group-wide standard regardless of which specific Findex Group entity is separately bound.

This Policy applies to all Findex Group entities and to its licensees, authorised representatives, advisers, employees, consultants, contractors (including employees of contractors), suppliers (including employees of suppliers), associates, officers, partners, Directors (executive and non-executive), and any other person who is notified that the Policy applies to them.

3. Definitions

Term	Definition
Board	Findex Group Limited Board and its subsidiary Boards
Contractor	A person or company providing services to Findex under a contract for services, and includes a former Contractor
Detriment	As defined in clause 9.1
Director	An individual who is appointed, or has previously been appointed, as a director of any Findex Group entity or subsidiary
Disclosable Matter	As defined in clause 4
Employee	Any person who has entered, or has previously entered, an employment agreement with a Findex Group company, including permanent, part-time, casual, fixed term or temporary employees, volunteers, interns and secondees, and includes a former Employee
Eligible Recipient	A person listed in clause 6.1 to whom a Whistleblower may make a report that qualifies for statutory protection
Personal Work-Related Grievance	A grievance about the Whistleblower's own employment or engagement with Findex, current or former, that does not involve illegal, dishonest or improper conduct. See clause 4 for examples and the mixed report carve-out
Subsidiaries	Any company that is wholly or partially owned and controlled by Findex, including but not limited to Centric and Sprout X
Whistleblower	An individual who is, or was, one of the people listed in clause 5 and who makes a report that is a Disclosable Matter under clause 4
Whistleblower Protection Officer (WPO)	The Head of Legal, Risk and Compliance, who is Findex's overall accountable owner of this Policy and a statutory Eligible Recipient. The WPO also holds Findex's AML/CTF Compliance Officer role, see clause 10
Whistleblower Investigation Officer (WIO)	The Risk Management Partner, or another person appointed under clause 10.2 to investigate a report
Whistleblower Support Contact	The nominated People and Culture representative who provides welfare support to a Whistleblower, separate from the WPO and the WIO, see clause 10.3
Wrongdoing	Conduct of the kind described in clause 4, including conduct that breaches laws or involves the misuse of a professional position or information obtained in a professional capacity

4. What conduct can be reported?

Findex encourages everyone to report actual or suspected Wrongdoing. Under the Corporations Act 2001 (Cth), a Whistleblower can disclose information where they have reasonable grounds to suspect it concerns misconduct, or an improper state of affairs, in relation to Findex. Wrongdoing also includes any disclosure that qualifies for protection under Part IVD of the Taxation Administration Act 1953 (Cth), see clause 9.8.

No Findex Group entity is the trustee of a registrable superannuation entity, so Part 29A of the Superannuation Industry (Supervision) Act 1993 (Cth) ("SIS Act") does not separately apply to Findex as a regulated entity in its own right, although conduct that breaches the SIS Act may still be Wrongdoing under this Policy.

In New Zealand, under the Protected Disclosures (Protection of Whistleblowers) Act 2022 (NZ), a whistleblower can make a protected disclosure if they believe on reasonable grounds that there is, or has been, serious wrongdoing in or by Findex, and they do not make the disclosure in bad faith. Findex treats a report that meets that test as a Disclosable Matter for the purposes of this Policy.

A disclosure qualifies for protection under this Policy if it is a **Disclosable Matter**: information the Whistleblower has reasonable grounds to suspect indicates Findex, or an Employee or officer of Findex, has or may have engaged in conduct that is illegal, unacceptable, undesirable, or its concealment. This includes:

- fraud, deceit or dishonesty, including theft, falsifying documents or false statements
- wrongful or questionable accounting, actuarial or auditing practices
- corrupt behaviour, including offering or accepting a reward for engaging or not engaging in particular behaviour
- illegal or unlawful conduct, or conduct that represents a danger to the public or the financial system
- bribery
- unethical behaviour, including misuse of company time or resources, or a breach of Findex's policies or Code of Conduct
- other serious misconduct detrimental to Findex or a related entity
- a contravention of the Corporations Act 2001 (Cth), the ASIC Act, the Financial Sector (Collection of Data) Act 2001 (Cth), the Insurance Act 1973 (Cth), the Life Insurance Act 1995 (Cth), the National Consumer Credit Protection Act 2009 (Cth), the SIS Act, the Taxation Administration Act 1953 (Cth), the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth), the Protected Disclosures (Protection of Whistleblowers) Act 2022 (NZ) or the Companies Act 1993 (NZ)
- an offence against any other Commonwealth law punishable by 12 months' imprisonment or more
- any other misconduct or improper state of affairs in relation to Findex.

A Whistleblower does not need to prove a report and remains protected even if the disclosure turns out to be incorrect. Protections do not apply to a person who knowingly makes a false disclosure.

What a report is not. A **Personal Work-Related Grievance** is not a Disclosable Matter and is not covered by this Policy. Examples include an interpersonal conflict with a colleague, or a decision about the Whistleblower's own engagement, transfer, promotion, discipline or termination. Report these instead to the relevant manager or to People and Culture, or under the Employee Complaints Procedure. A Personal Work-Related Grievance does not include conduct that would be victimisation for having made, or proposing to make, a report under this Policy, or a matter with significant implications for Findex.

Mixed reports. Where a report raises both a Personal Work-Related Grievance and a genuine Disclosable Matter, the Disclosable Matter element is assessed and protected under this Policy in the usual way; raising a grievance alongside it does not remove that protection.

A guide to reporting non-disclosable matters is in the Employee Complaints Procedure, read alongside this Policy.

5. Who is protected as a Whistleblower?

	Australia (Corporations Act 2001, s1317AAA)	New Zealand (Protected Disclosures Act 2022)
Covered individuals	Employees, Directors, Officers, Contractors, suppliers, Associates and Consultants to Findex, current or former	Employees, secondees, homeworkers, people concerned in management, NZ Armed Forces members, and volunteers, current or former
Family members	Relatives, dependants, spouses, and dependants of a spouse of any of the above	Not separately listed; NZ protections turn on the discloser's own role
Tax matters	A separate category of eligible tax whistleblower exists under the Taxation Administration Act 1953 (Cth), see clause 9.8	Not applicable
Internal procedure mandate	Mandatory for Findex under s1317AI	Section 29 of the Act mandates internal procedures for public sector organisations only. Findex is a private sector employer in New Zealand and maintains this Policy's New Zealand content as a Group governance standard, not a statutory requirement

Findex's audit teams receive a related category of disclosure: an employee of an audit client who discloses to Findex, in its capacity as that client's auditor, or to a member of the audit engagement team, is also an eligible whistleblower in relation to that disclosure.

Clients and other third parties are outside the scope of this Policy. A client concern is handled under Findex's Client Complaints process, which carries its own independence and escalation safeguards.

6. How do I make a report?

6.1 Eligible Recipients

Consistent with section 1317AAC of the Corporations Act 2001 (Cth), a Whistleblower can make a report to an Eligible Recipient, being:

- an officer or senior manager of Findex or a related body corporate, including a Director or member of Findex's Executive Leadership Team
- an auditor, internal or external, or a member of an audit team conducting an audit, of Findex or a related body corporate
- an actuary of Findex or a related body corporate
- the Head of Legal, Risk and Compliance, being the Whistleblower Protection Officer (WPO), as the person authorised by Findex to receive disclosures that may qualify for protection.

Eligible Recipients must maintain the confidentiality and anonymity of the Whistleblower, and protect them from adverse repercussions and Detriment. Before disclosing, a Whistleblower should tell the Eligible Recipient they are making a report under this Policy.

6.2 Reporting to the WPO

Email: michael.doucas@findex.com.au Phone: 03 9292 0101.

Where an Employee reports to a manager who is not an Eligible Recipient, the manager must refer the report to the WPO and confirm in writing to the Employee that this has been done.

6.3 Reporting to Your Call

Findex has authorised Your Call, an independent third party, to provide Findex's external whistleblowing service, for a Whistleblower who would rather raise a matter outside Findex. Reports to Your Call can be made anonymously, or the Whistleblower can consent to sharing their identity. Your Call does not investigate a report itself: with the Whistleblower's consent, it passes the report to Findex's nominated whistleblower officers (currently Michael Doucas) to be managed under this Policy. Where the report concerns the WPO, Your Call passes it instead to the Chair of the Board, consistent with clause 6.6. If the Whistleblower chooses to remain anonymous, Your Call will not give their identity to Findex without their consent.

- Online, 24/7: www.yourcall.com.au/findex (https://findex.relyplatform.com/home)
- Phone, 7am to midnight AEST, business days: 1300 790 228 (Australia), 0800 123 508 (New Zealand)
- Email: disclosures@yourcall.com.au

A Whistleblower can securely upload supporting documents through Your Call's portal, and, after making a report, stay in contact with Findex and receive updates through Your Call's online message board.

6.4 Accessibility and language support

A Whistleblower who is deaf, or has a hearing or speech impairment, can contact Your Call online, or through the National Relay Service at www.accesshub.gov.au, asking for Your Call's hotline on 1300 790 228. A Whistleblower who would rather not report in English can contact Your Call through the Translating and Interpreting Service (TIS National, 131 450), asking for Your Call on 1300 790 228. Findex will also arrange an interpreter for any meeting held as part of an investigation on request.

6.5 Direct report to a regulator

A Whistleblower may report directly to ASIC, APRA, the ATO or the TPB (including as a tax whistleblower, see clause 9.8), or to any Appropriate Authority defined under section 25 of the Protected Disclosures (Protection of Whistleblowers) Act 2022 (NZ). A regulator will keep the discloser's identity confidential unless required by law to disclose it.

6.6 Reports concerning senior leadership or the Board

Where a report concerns the Chief Executive, a member of the Executive Leadership Team, or a Director, it should be made directly to the Chair of the Board (or, if the report concerns the Chair, the Deputy Chair). Where a report concerns the WPO, it should be made to another Eligible Recipient under clause 6.1, consistent with clause 10.

7. Anonymous reporting

Findex accepts anonymous reports through Your Call, or directly to any Eligible Recipient. An anonymous Whistleblower who reports through Your Call can still take part in an ongoing, two-way exchange with Findex through Your Call's online message board, so follow-up questions can be answered without the Whistleblower's identity being revealed.

Choosing to remain anonymous may limit how fully Findex can investigate a report. This does not affect the legal protections available to the Whistleblower.

8. What happens after I make a report?

8.1 Acknowledgement and triage

Findex aims to acknowledge a report, and check on the Whistleblower's wellbeing where their identity is known, within 3 business days. Within 5 business days of a report being referred to them, the WPO decides whether an investigation is warranted, and tells the Whistleblower (where contactable) of that decision and its reasons.

The WIO has discretion not to investigate a report that is frivolous or vexatious, that is already being investigated through another process, that the Whistleblower does not want pursued and that raises no matter warranting investigation on its own, or that does not contain enough information to investigate, particularly an anonymous report with no means of follow-up.

8.2 Investigation

All reports are received and treated seriously, assessed to confirm whether they are a qualifying disclosure, investigated internally or externally as appropriate, and dealt with fairly, objectively and in a timely manner.

Investigations are conducted independently, fairly, transparently, and with natural justice and due process for everyone involved, including the person named in a report, see clause 9.2. Any conflict of interest, including a conflict involving the WPO, is managed under clause 10.4.

Where practicable, Findex aims to complete an investigation and reach a determination within 30 calendar days of the decision to investigate, and will tell the Whistleblower if more time is needed and why. The Whistleblower is kept informed of the investigation's general progress and outcome, subject to the privacy of those named in it.

8.3 Outcome and right to request a review

The WIO's determination, and any resulting action, is reported to the WPO. A Whistleblower who disagrees with how their report was handled, though not with a finding made about someone else's conduct, may ask the WPO in writing within 15 business days of being told the outcome for that handling to be reviewed by another Eligible Recipient who was not involved in the original investigation.

9. Protections for Whistleblowers

9.1 Protection from Detriment

Findex will take all reasonable steps to protect a Whistleblower from Detriment and will act on any detrimental treatment identified. Detriment includes, without limitation, dismissal, demotion or other disadvantageous change to an Employee's role, harassment, intimidation, discrimination, disciplinary action, injury including psychological harm, damage to property, and unfavourable treatment connected with making a report.

Detriment does not include a reasonable administrative step taken to protect the Whistleblower (for example a temporary transfer), or reasonable management of an Employee's performance in line with Findex's performance management framework.

Where a report raises a credible risk of Detriment, the WPO or WIO will assess the motive, likelihood and severity of that risk, and the steps needed to monitor and mitigate it, as part of the investigation plan, rather than only after Detriment has occurred.

9.2 Ensuring Fair Treatment

Findex extends natural justice to a person named in a report. This includes keeping the matter confidential, telling investigators and managers only on a need-to-know basis, advising the person of the substance of any allegation against them before any adverse finding, giving them a genuine opportunity to respond, and telling them the investigation's outcome. A person named in a report is treated as not having engaged in the conduct alleged unless and until the investigation finds otherwise, and may also be offered support under clause 9.6 while the matter is resolved.

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9.3 Protection of Information provided by Whistleblowers

A qualifying disclosure is a protected disclosure. Disclosing a Whistleblower's identity, or information likely to identify them, without their consent, is an offence, except a disclosure made to a regulator, the police, or with the Whistleblower's consent.

9.4 Legal Protections for Whistleblowers

Under section 1317AB of the Corporations Act 2001 (Cth), a Whistleblower who makes a qualifying disclosure is protected from civil, criminal and administrative liability for making it, has qualified privilege in respect of it, and cannot have a contract terminated on the basis that making the disclosure was a breach of it. These protections do not extend to the Whistleblower's own misconduct revealed by the disclosure.

Under section 1317AC of the Corporations Act 2001 (Cth), it is unlawful to cause or threaten Detriment to someone because of a belief or suspicion that they have made, may make, or could make, a Whistleblower report. In New Zealand, the Protected Disclosures (Protection of Whistleblowers) Act 2022 (NZ) prohibits an employer or any person from treating a discloser unfavourably, retaliating, or threatening to retaliate, for making a protected disclosure.

9.5 Reports to other bodies

A Whistleblower who makes a protected disclosure outside this Policy, including directly to ASIC or another prescribed body, may still be entitled to legal protection; the same applies in New Zealand. A public interest disclosure or an emergency disclosure can, in limited circumstances, be made to a journalist or parliamentarian and still qualify for protection, but only after a prior disclosure to ASIC or a prescribed body, written notice of that disclosure, and at least 90 days have passed. A Whistleblower should get independent legal advice before making a public interest or emergency disclosure.

9.6 Support for Whistleblowers

Findex provides, consistent with section 1317AI(5)(c) of the Corporations Act 2001 (Cth):

- a Whistleblower Support Contact, separate from the WPO and the WIO, as the Whistleblower's welfare point of contact, see clause 10.3
- access to Findex's Employee Assistance Program, extended to former Employees and other Whistleblowers who are not current Employees
- the option to bring a support person to any discussion about the report
- regular updates on investigation progress and outcome, to the extent this does not compromise confidentiality or the investigation
- help identifying independent legal advice
- workplace measures where appropriate, such as temporary transfer or adjusted reporting lines, to reduce the risk of Detriment.

9.7 Compensation and Other Remedies Available to Whistleblowers

Under sections 1317AD and 1317AE of the Corporations Act 2001 (Cth), a Whistleblower who suffers, or is threatened with, Detriment because they made or may make a qualifying disclosure may apply to a court for compensation and other remedies, including an order that the person responsible (and, in some circumstances, Findex as their employer, jointly and severally) compensate the Whistleblower, an apology, reinstatement where Detriment involved termination, an injunction, exemplary damages, or any other order the court considers appropriate. These remedies exist independently of the support Findex provides under this Policy.

9.8 Tax Whistleblower Protections

Part IVD of the Taxation Administration Act 1953 (Cth) is a separate whistleblower regime, administered by the Commissioner of Taxation, for disclosures concerning taxation matters. An eligible tax whistleblower is a current or former officer or employee of Findex, a supplier of goods or services to Findex (or their employee), an associate of Findex, or a spouse, child or dependant of any of these.

A disclosure qualifies where the eligible tax whistleblower discloses to the Commissioner of Taxation, believing it may assist the Commissioner's functions in relation to Findex. Following the Treasury Laws Amendment (Tax Accountability and Fairness) Act 2024, a qualifying disclosure can also be made to the Tax Practitioners Board, where it may assist the TPB's functions under the Tax Agent Services Act 2009. These disclosures carry their own confidentiality, immunity, anti-victimisation and compensation protections, in addition to this Policy.

Findex is a registered tax agent. Anyone who suspects Wrongdoing in Findex's own tax affairs or tax practice conduct may be an eligible tax whistleblower, separately from any status as a Whistleblower under the Corporations Act. Findex encourages raising the matter with the WPO first, without prejudice to the right to disclose directly to the Commissioner of Taxation or the TPB.

10. Roles and responsibilities

Findex separates the intake, welfare and investigation functions under this Policy, so that no single person carries all three for the same report.

10.1 Whistleblower Protection Officer

The Head of Legal, Risk and Compliance is the WPO: Findex's overall accountable owner of this Policy, a statutory Eligible Recipient, and the point of escalation for reports referred up from managers. The WPO refers each report to the WIO, appointing another WIO where the standing WIO is conflicted, and receives the WIO's decision on whether a report warrants investigation. The WPO is also Findex's nominated whistleblower officer for reports made through Your Call, see clause 6.3.

10.2 Whistleblower Investigation Officer

The Risk Management Partner is Findex's standing WIO, or another Eligible Recipient the WPO appoints for a particular matter. The WPO may also appoint a third party investigator. The WIO conducts the investigation under clause 8 and reports the outcome to the WPO.

10.3 Whistleblower Support Contact

A nominated People and Culture representative is the Whistleblower Support Contact: a welfare point of contact, separate from the WPO and the WIO, responsible for the support in clause 9.6 and for checking in on the Whistleblower's wellbeing during an investigation.

10.4 Managing conflicts, including the WPO's AML/CTF role

The Head of Legal, Risk and Compliance also holds Findex's AML/CTF Compliance Officer role. Where a report touches suspected money laundering or terrorism financing, the WPO must have regard to Findex's obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) before giving the Whistleblower feedback, so that feedback does not disclose information from which it could be inferred that a suspicious matter report has been given to AUSTRAC, which would risk an offence against section 123 of that Act.

Where that dual role, or any other conflict, means the WPO cannot act impartially in a particular matter, including where the WPO's own conduct or handling of a suspicious matter report is in issue, the matter is instead referred to another Eligible Recipient, who exercises the WPO's functions under this Policy for that matter. Where the WIO or the Whistleblower Support Contact has a conflict of interest in a matter, the WPO appoints another person to that role for that matter. Records of a matter are accessible only to those who need them to carry out their role in it, and never to a person with a conflict in that matter.

10.5 Risk Management Team and all Employees

All Employees, Directors, officers and contractors are responsible for complying with this Policy.

11. Reporting and governance

The WPO reports whistleblower activity to the Risk Management Committee each quarter, covering the number of reports received, their general nature and status, and any emerging themes, de-identified to protect confidentiality. An annual summary is reported to the Board as part of the Risk Management Committee's reporting cycle. Where a matter concerns accounting, internal controls or audit, the Audit Committee is also notified. Where a matter concerns conduct that could also trigger an ASIC reportable situation, a TPB Code breach notification, an AUSTRAC suspicious matter report, or an OAIC notifiable data breach assessment, the WPO coordinates the response across those regimes rather than treating each in isolation.

Where a report identifies a crime against a person or property, the WPO decides whether to refer it to law enforcement and, where practicable, consults the Whistleblower first. A person in immediate danger should contact emergency services (000 in Australia, 111 in New Zealand).

12. Record keeping

Records relating to a report under this Policy, including the report itself, any investigation file and its outcome, are kept confidentially and securely by the Risk Management Team, in accordance with Findex's Records Management Policy, and are retained for as long as that Policy requires for a matter of this kind.

13. Non-compliance with this Policy

It is a condition of employment or engagement with Findex that all Employees, officers and contractors comply with this Policy at all times. This Policy does not form part of any employment or engagement contract, and any breach of it by an Employee may result in disciplinary action, up to and including dismissal.

14. Education and training

Every Findex Employee completes mandatory whistleblower awareness training as part of induction, and refresher training at least annually. Eligible Recipients, the WIO and the Whistleblower Support Contact complete additional role-specific training on receiving, supporting and investigating a report. This Policy is communicated to all managers, Employees, contractors and other relevant persons connected with Findex.

15. Review

This Policy is reviewed by Findex annually, and whenever victimisation occurs as a result of a report, investigation or resolution under this Policy. Whistleblower activity, reporting and outcomes are reviewed against Findex's identified risks and control environment on a regular basis, so that trends are identified and controls strengthened over time.

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This Policy was developed with reference to the published whistleblower policies of ten Australian and New Zealand professional services firms, to identify and adopt good practice beyond the statutory minimum, including quantified service standards, role separation between report intake, welfare support and investigation, accessibility and language support, an escalation path for reports about senior leadership, and a right to request a review of how a report was handled.

Version	Author	Effective Date	Comments
001	Michael Doucas	26 November 2026	Revised and refreshed Policy

Policy Owner	Head of Legal, Risk and Compliance
Policy Key Contact	Risk Management Partner
Next Review by	November 2027
Relevant legislation	Australian Securities and Investments Commission Act (Cth), Corporations Act 2001 (Cth), Superannuation Industry (Supervision) Act 1993 (Cth), Taxation Administration Act 1953 (Cth), Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth), Companies Act 1993 (NZ), Protected Disclosures (Protection of Whistleblowers) Act 2022 (NZ)
Relevant Standards and guidance	ASIC Regulatory Guide 270, Whistleblower policies
Relevant policies and strategies	Risk Management Policy, Findex Code of Conduct, AML/CTF Program, Records Management Policy
Relevant forms, procedures, templates	