

Whistleblower Policy

Crigen Resources Limited

This Whistleblower policy may be updated or changed without prior notice at our discretion. The most current version of it can be found on <https://danaiwellness.com/>. When determining current requirements, you should always access the current online version, and not rely on earlier versions.

1. Purpose

- (a) Crigen Resources Limited (the 'Company') is committed to ensuring the highest standards of integrity and promoting a culture of honest and ethical behaviour, corporate compliance, and good corporate governance. As part of this commitment, the Company recognises the need to have robust procedures in place to ensure people can report instances of suspected unethical, illegal, fraudulent, or undesirable conduct by the Company or its officers, employees or agents, and to ensure that anyone who does report such behaviour can do so without fear of reprisal, discrimination, intimidation or victimisation.
- (b) This policy forms part of the Company's broader risk management framework, and should be read in the context of the Company's other policies and procedures as varied from time to time.
- (c) The purpose of this Whistleblower policy is to:
- Help deter wrongdoing by encouraging more disclosures of wrongdoing to the Company.
 - Set out how people to whom this policy applies can report matters and how those matters will be investigated.
 - Describe how the Company will protect the identity of persons making disclosures, and other persons because a disclosure has been made, under this policy and safeguard them from detriment and retaliation.
 - Provide transparency around the Company's framework for receiving, handling, and investigating disclosures.
 - Support the Company's values, code of conduct and ethics policy, its long-term sustainability and reputation, and to meet its legal and regulatory obligations.
 - Describe the protections available where the disclosures are made in accordance with Part 9.4AAA of the Corporations Act 2001 (Cth) (the 'Corporations Act') or Part IVD of the Taxation Administration Act 1953 (Cth) (the 'Tax Act').

- Place ultimate responsibility for this policy, its implementation, and the encouragement of people to whom this policy applies to speak up without fear of victimisation or retaliation, with the Company's Board.
 - Align with the Australian Securities Exchange Corporate Governance Principles and Recommendations.
- (d) This policy applies to:
- The Board of the Company and each director.
 - All employees of the Company, whether permanent or casual, full-time or ongoing, trainees or apprentices.
 - Entities or persons providing goods and services to the Company, whether through a company, partnership, sole trader, or labour hire arrangement.
 - Individuals identified as Eligible Whistleblowers in Schedules 1 and 2.

2. Roles and responsibilities

- (a) The Board has responsibility for:
- (i) And ownership of, this Whistleblower policy, including approving the Whistleblower policy and any amendments.
 - (ii) Ensuring this Whistleblower policy complies with the Company's legal and ethical obligations, and that all those under its control comply with it.
 - (iii) Where relevant, determining how a matter reported under this Whistleblower policy will be managed, including seeking legal advice on the Company's statutory or other legal obligations arising from a disclosure made under this Whistleblower policy, or the application of this Whistleblower policy, and notifying an external regulator or law enforcement agency.
 - (iv) Periodically reviewing the effectiveness of this Whistleblower policy and updating the policy or the Company's processes as necessary.

3. What is reportable conduct?

- (a) A person to whom this Whistleblower policy applies should make a disclosure under this policy if they reasonably suspect that conduct, or a state of affairs exists, in relation to the Company that is any of the following:
 - (i) Misconduct, or an improper state of affairs or circumstances, in relation to the Company.
 - (ii) Misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of the Company, and where they consider the information may assist the recipient to perform functions and duties in relation to the tax affairs of the Company.
 - (iii) In contravention of any law administered by Australian Securities and Investments Commission ('ASIC') or Australian Prudential Regulation Authority ('APRA').
 - (iv) Conduct that represents a danger to the public or the financial system (even if this conduct does not involve a breach of a particular law).
 - (v) Conduct that is an offence against any law of the Commonwealth, where the offence is punishable by imprisonment for a period of 12 months or more.

(Collectively referred to as '**Reportable Conduct**'.)

- (b) Reportable Conduct includes conduct that either:
 - (i) May or may not involve a contravention of any law.
 - (ii) May include conduct that indicates a systemic issue in the Company.
 - (iii) Relates to dishonest or unethical behaviour and practices.
 - (iv) May relate to business behaviour and practices that may cause consumer harm.
 - (v) Is prohibited under the Company's code of conduct.
- (c) Without limiting the type of conduct that can be disclosed under this Whistleblower policy, examples of conduct that is appropriate to disclose under this policy includes conduct that is:
 - (i) Fraudulent or corrupt, such as money laundering or misappropriation of

funds.

- (ii) In breach of a law administered by ASIC or APRA, and a law of the Commonwealth punishable by 12 months imprisonment or more. Examples of conduct in breach of Corporations Law could include:
 - a. Insider trading;
 - b. Insolvent trading;
 - c. Breach of the continuous disclosure rules;
 - d. Failure to keep accurate financial records;
 - e. Falsification of accounts;
 - f. Failure of a director, or another officer, to act with the care and diligence a reasonable person would exercise, or to act in good faith in the best interests of the corporation, or to give notice of any material personal interest relating to the affairs of the company.
 - g. Illegal, such as theft, the sale or use of prohibited substances, violence or threatened violence, harassment, or criminal damage to property.
 - h. Unethical, such as acting dishonestly, altering records without cause or permission, making false entries in records, engaging in questionable financial practices, offering or accepting a bribe.
 - i. Contrary to, or a serious breach of, codes and practices (including work practices) of the company.
 - j. Potentially damaging to the company, including conduct that may cause financial or non-financial loss to the company, or is otherwise detrimental to its interests.
 - k. Engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure, or is believed or suspected to have made, or be planning to make, a disclosure under this whistleblower policy.
- (d) Schedule 1 describes special Protections for Whistleblowers who disclose information concerning misconduct or an improper state of affairs or circumstances in relation to the Company under the Corporations Act.
- (e) Schedule 2 describes special Protections for Whistleblowers under the Tax Act.

(f) Schedule 3 provides the definitions of terms used throughout this policy.

4. Who can I make a report to?

For the purposes of this policy to ensure appropriate escalation and timely investigation, we request that reports are made to the Eligible Recipient, who may be contacted via the details listed below:

Email:

xxx

Reports may also be posted in hardcopy to Level 10, 20 Martin Place Sydney NSW 2000 (marked for the attention of the Chief Compliance Officer). Reports should include as much information as possible, including the details of the misconduct, people involved, dates, locations and any other evidence that exists.

You may also raise the matter with an 'officer' or 'senior manager' of the Company. This includes a director, or a Senior Manager in the Company who makes, or participates in making, decisions that affect the whole, or a substantial part, of the business of the Company, or who has the capacity to affect significantly the Company's financial standing.

Any person who makes, or is considering making, a report under this Policy may wish to contact a legal practitioner to determine if the Protections will apply to them.

A person making a report must not knowingly make a false or vexatious claim and Protections under this Policy will not be applied to such reports. The Company may apply disciplinary proceedings to any staff member making them.

Anonymous Reporting

All reports can be made anonymously and still receive the legal Protections provided under this Policy, however anonymity may limit the Company's ability to investigate the matters reported.

Persons disclosing Reportable Conduct are encouraged to disclose their identity when making a report under this Policy. In addition to making it easier to conduct an investigation, it enables the Company to Protect that person from retaliation or detriment.

To be clear, a person making an anonymous report is afforded the same legal Protections under the policy as a person who has identified themselves.

5. Investigation of reportable conduct

Report provided to the Eligible Recipient

The Eligible Recipient will investigate all matters reported under this policy as soon as practicable after the matter has been reported.

If the Eligible Recipient determines a report does not fall under or relate to Reportable Conduct, they will inform the person making the report and advise them of how the matter will be handled under the Company's complaints process.

If the Eligible Recipient determines a report is Reportable Conduct, based on the nature of the report they will determine whether the investigation will be conducted by an internal or external investigator.

The Eligible Recipient may, with your consent, appoint a person to assist in the investigation of a report. Where appropriate, the Eligible Recipient will provide feedback to you regarding the investigation's progress and/or outcome (subject to considerations of the privacy of those against whom allegations are made).

The investigation will be conducted in an objective and fair manner, and otherwise as is reasonable and appropriate having regard to the nature of the Reportable Conduct and the circumstances.

While the particular investigation process and enquiries adopted will be determined by the nature and substance of the report, in general, as soon as practicable upon receipt of the report, if the report is not anonymous, the Eligible Recipient or Investigator will contact you to discuss the investigation process including who may be contacted and such other matters as are relevant to the investigation.

Where a report is submitted anonymously, the Company or an Investigator acting on its behalf will conduct the investigation and its enquiries based on the information provided to it.

Role of the Investigator

- (a) conduct the investigation as quickly and efficiently as circumstances permit;
- (b) conduct the investigation in an objective and fair manner;
- (c) ensure the identity of the person making the report remains confidential as far as reasonably possible;
- (d) ensure the investigation is conducted independent from any persons to whom the disclosure relates; and,
- (e) ensure every person subject to the investigation is granted sufficient opportunity to reply to allegations before any findings are made.

Resolution

Issues identified from the investigation will be resolved or otherwise finalised.

The details of investigation and the outcome will be informed to the Company's Board on a confidential and anonymous basis.

6. Protection of Whistleblowers

The Company is committed to ensuring confidentiality in respect of all matters raised under this policy, and that those who make a report are treated fairly and do not suffer detriment.

Protection against detrimental conduct

Detrimental treatment includes dismissal, demotion, harassment, discrimination, disciplinary action, bias, threats, or other unfavourable treatment connected with making a report.

If you are subjected to detrimental treatment as a result of making a report under this policy you should:

- (a) inform an officer or senior manager immediately; or
- (b) raise it in accordance with section 4 of this policy (above).

Protection of your identity and confidentiality

Subject to compliance with legal requirements, upon receiving a report under this policy, the Company will only share your identity as a Whistleblower or information likely to reveal your identity if:

- (a) you consent;
- (b) the concern is reported to the Australian Securities and Investments Commission (ASIC), the Australian Prudential Regulation Authority (APRA), the Tax Commissioner (ATO) or the Australian Federal Police (AFP); or
- (c) the concern is raised with a lawyer for the purpose of obtaining legal advice or representation.

If the Company needs to investigate a report, it may disclose information that could lead to your identification, but it will take reasonable steps to reduce this risk.

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

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) without your consent as a Whistleblower will be a breach of this policy.

Whistleblowers are assured that a release of information in breach of this policy will be regarded as a serious matter and will be dealt with under the Company's disciplinary procedures.

7. Duties of employees in relation to reportable conduct

It is expected that employees of the Company who become aware of actual or suspect on reasonable grounds, potential cases of Reportable Conduct will make a report under this policy or under other applicable policies.

8. False reporting

A false report of Reportable Conduct could have significant effects on the Company's reputation and the reputations of other staff members and could also cause considerable waste of time and effort. Deliberate false reports involve a discloser reporting information they know to be untrue. It does not include situations where you have reasonable grounds to suspect misconduct or an improper state of affairs, but your suspicions are later (for example after an investigation) determined to be unfounded.

Any deliberately false reporting of Reportable Conduct, whether under this policy or otherwise, will be treated as a serious disciplinary matter. You will also not have the protections under this policy or the Corporations Act 2001 (Cth) if you make a false report.

9. Support material and evidence

Where you are able to, you are encouraged to assist with evidence. This can be in the form of, but not limited to contemporary notes of a meeting or observation, documentation, data, screenshots or recordings.

Schedule 1 - Special protections under the Corporations Act

1. When does a disclosure qualify for protection under the Corporations law, and what protections and immunities are available?

- 1.1. Eligible Whistleblowers may be able to obtain certain statutory protections and immunities where they make a disclosure that qualifies for protection under Part 9.4AAA of the Corporations Law.
- 1.2. This Schedule 1 provides an overview of the requirements that must be met for a disclosure of information to qualify for protection under Part 9.4AAA of the Corporations Law. To avoid doubt, although many of the protections and immunities are mirrored in this Whistleblower policy, the protections in Part 9.4AAA of the Corporations Law are in addition to protections and immunities specified in this Whistleblower policy.
- 1.3. This Schedule 1 is intended for information purposes only and should not be taken as the provision of legal advice in respect of the operation and application of the Whistleblower regime in Part 9.4AAA of the Corporations Law. Legal advice should be obtained from an independent legal practitioner.

2. Conditions that must be met for a disclosure to qualify for protection under the Corporations law

Certain disclosures qualify for protection under the Corporations Act 2001 ('the Corporations Act') if certain conditions are met, namely:

- 2.1. The information disclosed relates to a **Regulated Entity**.
- 2.2. The individual making the disclosure is an **Eligible Whistleblower** in relation to the regulated entity.
- 2.3. The disclosure is made to a person who is eligible to receive a disclosure under the whistleblower regime ('**Eligible Recipient**').
- 2.4. The Whistleblower has reasonable grounds to suspect that the information being disclosed concerns misconduct, or an improper state of affairs or circumstances in relation to the Company ('**Reportable Conduct**').
- 2.5. The disclosure is not a **Personal Work-Related Grievance**.

<u>Key Terms in relation to point 2 above</u>	
Regulated Entity	<p>Includes:</p> <ul style="list-style-type: none"> • Companies (as defined in section 9 of the Corporations Act). • Constitutional corporations. • Authorised deposit-taking institutions (ADIs) and subsidiaries of ADIs. • Insurers. • Life insurance companies. • Superannuation trustees. • Registrable superannuation entities (RSEs).
Eligible Whistleblower	<p>The Whistleblower is or has been:</p> <p>(a) an officer or employee of the Company;</p> <p>(b) an individual who supplies goods or services to the Company or an employee of a person who supplies goods or services to the Company;</p> <p>(c) an individual who is an associate of the Company; or</p> <p>(d) a relative, dependent or dependent of the spouse of any individual referred to at (a) to (c) above.</p>
Eligible Recipient	<p>The report is made to:</p> <p>(a) the Head of Compliance;</p> <p>(b) an officer or senior manager of the Company concerned;</p> <p>(c) the Company's external auditor (or a member of that audit team);</p> <p>(d) an actuary of the Company;</p> <p>(e) ASIC;</p> <p>(f) APRA; or</p> <p>(g) 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.</p>
Reportable Conduct	<p>May include:</p> <p>(a) Misconduct or an improper state of affairs or circumstances in relation to the regulated entity (or a related body corporate).</p> <p>(b) Conduct that constitutes an offence against, or contravention of, a law administered by ASIC or APRA.</p> <p>(c) Conduct that constitutes an offence against another law of the Commonwealth punishable by more than 12 months imprisonment.</p> <p>(d) Conduct that is a danger to the public or the financial system.</p>

<p>Personal Work-Related Grievance</p>	<p>A Personal Work-Related Grievance is a disclosure of information concerning a grievance about any matter in relation to the Eligible Whistleblower's employment, or former employment, or having (or tending to have) implications for the Whistleblower personally.</p> <p>However, a personal work-related grievance will be disclosure qualifying for protection under Part 9.4AAA of the Corporations Law if it either:</p> <p>(a) Has significant implications for the regulated entity to which it relates, or wider ramifications than those that are personal to the whistleblower.</p> <p>(b) Relates to a grievance by the eligible whistleblower about detrimental conduct suffered or threatened due to a person believing or suspecting that a disclosure qualifying for protection under Part 9.4AAA of the Corporations Law has been made, may be made, is proposed to be made, or could be made.</p>

3. Protections and immunities available where a qualifying or protected disclosure is made under the Corporations law

Where a qualifying or protected disclosure is made, Part 9.4AAA of the Corporations Law provides the following protections and immunities:

- 3.1. The Whistleblower is immune from any civil, criminal or administrative legal action (including disciplinary action) for making the disclosure.
- 3.2. No contractual or other remedies may be enforced, and no contractual or other right may be exercised, against the Whistleblower for making the report.
- 3.3. In some circumstances, the reported information is not admissible against the Whistleblower in criminal proceedings or in proceedings for the imposition of a penalty.
- 3.4. Anyone who causes or threatens to cause detriment to a Whistleblower or another person in the belief or suspicion that a report 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.

- 3.5. A Whistleblower's identity cannot be disclosed to a Court or tribunal except where considered necessary.
- 3.6. The person receiving the report commits an offence if they disclose the substance of the report or the Whistleblower's identity, without the Whistleblower's consent, to anyone except ASIC, APRA, the AFP or a lawyer for the purpose of obtaining legal advice or representation in relation to the report.

4. Confidentiality

If a report is made, the identity of the discloser must be kept confidential unless one of the following exceptions applies:

- 4.1. The discloser consents to the disclosure of their identity.
- 4.2. Disclosure of details that might reveal the discloser's identity is reasonably necessary for the effective investigation of the matter.
- 4.3. The concern is reported to ASIC, APRA, or the AFP.
- 4.4. The concern is raised with a lawyer for the purpose of obtaining legal advice or representation.

Schedule 2 - Special protections under the Taxation Administration Act

The Taxation Administration Act 1953 ('the Tax Act') gives certain Whistleblowers protections where they make protected disclosures to eligible recipients.

1. When does a disclosure qualify for protection under the Tax Act, and what protections and immunities are available?

- 1.1. Eligible Whistleblowers may be able to obtain certain statutory protections and immunities where they make a disclosure that qualifies for protection under Part IVD of the Tax Act.
- 1.2. This Schedule 2 provides an overview of the requirements that must be met for a disclosure of information to qualify for protection under Part IVD of the Tax Act. To avoid doubt, although many of the protections and immunities are mirrored in this Whistleblower policy, the protections in Part IVD of the Tax Act are in addition to protections and immunities specified in this Whistleblower policy.
- 1.3. This Schedule 2 is intended for information purposes only and should not be taken as the provision of legal advice in respect of the operation and application of the Whistleblower regime in Part IVD of the Tax Act. Legal advice should be obtained from an independent legal practitioner.

2. Conditions that must be met for a disclosure to qualify for protection under the Tax Act when made to an eligible recipient

- 2.1. The information disclosed relates to an **Entity**.
- 2.2. The Whistleblower making the disclosure is an **Eligible Whistleblower**.
- 2.3. The disclosure is made to a person eligible to receive a qualifying disclosure under Part IVD of the Tax Act ('**Eligible Recipient**').
- 2.4. The Whistleblower has reasonable grounds to suspect that the information being disclosed indicates misconduct, or an improper state of affairs or circumstances in relation to the tax affairs of the Company ('**Reportable Conduct**').

Key Terms in relation to point 2 above	
Entity	Means any of the following: <ul style="list-style-type: none">• a company;• a partnership;• a person in a particular capacity of trustee;• a body politic;• a corporation sole;

	<ul style="list-style-type: none"> • any other person.
<p>Eligible Whistleblower</p>	<p>An individual is an Eligible Whistleblower (within the meaning of the Income Tax Assessment Act 1997) if the individual is, or has been, any of the following:</p> <ul style="list-style-type: none"> (a) an officer (within the meaning of the Corporations Act 2001) of the entity; (b) an employee of the entity; (c) an individual who supplies services or goods to the entity (whether paid or unpaid); (d) an employee of a person that supplies services or goods to the entity (whether paid or unpaid); (e) an individual who is an associate (within the meaning of section 318 of the Income Tax Assessment Act 1936) of the entity; (f) a spouse or child of an individual referred to in any of paragraphs (a) to (e); (g) a dependant of an individual referred to in any of paragraphs (a) to (e), or of such an individual's spouse; (h) an individual prescribed by the regulations for the purposes of this paragraph in relation to the entity.
<p>Eligible Recipient</p>	<p>The report is made to:</p> <ul style="list-style-type: none"> (a) the Head of Compliance; (b) a director, secretary or senior manager of the Company; (c) the Company external auditor; (d) a registered tax agent or BAS agent who provides tax or BAS services to the Company; (e) any other employee or officer of the Company who has functions or duties relating to tax affairs of the Company (e.g. an internal accountant) (Company recipients); (f) the Commissioner of Taxation; or (g) a lawyer for the purpose of obtaining legal advice or representation in relation to a report.

Reportable Conduct	<p>Where the disclosure of information by an Eligible Whistleblower is:</p> <p>(a) Made to the Commissioner of Taxation, and the Eligible Whistleblower considers that the information may assist the Commissioner to perform their functions or duties under a taxation law (as defined in the Income Tax Assessment Act 1997 (Cth)) in relation to the entity or an associated of the entity.</p> <p>(b) Made to an Eligible Recipient of the Company, and the Eligible Whistleblower:</p> <p>(i) Has reasonable grounds to suspect the information indicates misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of the entity or an associated of the entity; and</p> <p>(ii) considers the information may assist the eligible recipient to perform functions or duties in relation to the tax affairs of the entity or an associated of the entity.</p>
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3. Protections and immunities available when a qualifying disclosure is made under the Tax Act

Where a qualifying disclosure is made, Part IVD of the Tax Act provides the following protections and immunities:

- 3.1. The Whistleblower is immune from any civil, criminal or administrative legal action (including disciplinary action) for making the disclosure.
- 3.2. No contractual or other remedies may be enforced, and no contractual or other right may be exercised, against the Whistleblower for making the report.
- 3.3. Where the disclosure was made to the Commissioner of Taxation, the reported information is not admissible against the 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.
- 3.4. Unless the Whistleblower has acted unreasonably, a Whistleblower cannot be ordered to pay costs in any legal proceedings in relation to a report.
- 3.5. Anyone who causes or threatens to cause detriment to a Whistleblower or another person in the belief or suspicion that a report 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.

- 3.6. A Whistleblower's identity cannot be disclosed to a Court or tribunal except where considered necessary.
- 3.7. The person receiving the report commits an offence if they disclose the substance of the report or the Whistleblower's identity, without the Whistleblower's consent, to anyone except the Commissioner of Taxation, the AFP or a lawyer for the purpose of obtaining legal advice or representation in relation to the report.

4. Confidentiality

If a report is made, the identity of the discloser must be kept confidential unless one of the following exceptions applies:

- 4.1. The discloser consents to the disclosure of their identity.
- 4.2. The concern is reported to the Commissioner of Taxation or to a member of the Australian Federal Police (within the meaning of the Australian Federal Police Act 1979).
- 4.3. The concern is raised with a lawyer for the purpose obtaining legal advice or representation.
- 4.4. Disclosure of details that might reveal the discloser's identity is reasonably necessary for the effective investigation of the matter.

Schedule 3: Definitions

The following definitions shall apply to this Policy:

Term	Definition
APRA	Australian Prudential Regulation Authority
ASIC	Australian Securities and Investments Commission
Board	Board of Directors
Corporations Act	Corporations Act 2001 (Cth)
Detriment	<p>Can include, but is not limited to:</p> <ul style="list-style-type: none"> • dismissal of an employee or alteration to their position/duties to their disadvantage; • negative performance feedback that is not reflective of actual performance; • harassment, intimidation, or bullying; or, • threats to cause detriment.
Detrimental Conduct	Negative action taken against any person who makes a Report or assists or participates in an investigation of the disclosure and as a result suffers detriment.
Eligible Recipient	A person authorised under Whistleblower Laws to receive disclosures.
Eligible Whistleblower	<p>Unless otherwise stated, an Eligible Whistleblower is a person who is, or who has been, any of the following in relation to the Company:</p> <ol style="list-style-type: none"> a) an officer or employee (e.g. current or former staff member who may be permanent, full-time, part-time, fixed-term, temporary, contractor), or a director; b) a supplier of services or goods to the Company (paid or unpaid), and their employees; c) an associate of the Company; and d) a relative, dependant or spouse of a person in (a) to (c) of this definition.
Investigator	A person competent in investigating Reportable Conduct, for example the Chief Compliance Officer or the Company Secretary.

Protections	<p>A person must make their report to an Eligible Recipient to qualify for legal protections under Whistleblower Laws and this policy. These protections include:</p> <ul style="list-style-type: none"> • identity protection (confidentiality); • protection from detriment; • compensation and other remedies; and • civil, criminal and administrative liability protection.
Public Interest and Emergency Disclosure Reporting	<p>Reports made in “public interest” and “emergency disclosure” situations are also protected. Under these circumstances, reports can be made to an Eligible Public Recipient. It is important that a person making a report understands the criteria for making a public interest or emergency disclosure.</p> <p>It is suggested that independent legal advice is sought on the relevant requirements for these types of disclosures.</p>
Reportable Conduct	<p>Any past, present or likely future activity which may include:</p> <ul style="list-style-type: none"> • Misconduct, or an improper state of affairs or circumstances, in relation to the Company. • Misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of the Company, and where they consider the information may assist the recipient to perform functions and duties in relation to the tax affairs of the Company. • In contravention of any law administered by Australian Securities and Investments Commission ('ASIC') or Australian Prudential Regulation Authority ('APRA'). • Conduct that represents a danger to the public or the financial system (even if this conduct does not involve a breach of a particular law). • Conduct that is an offence against any law of the Commonwealth, where the offence is punishable by imprisonment for a period of 12 months or more. <p>May include conduct that either:</p> <ul style="list-style-type: none"> • May or may not involve a contravention of any law. • May include conduct that indicates a systemic issue in the Company. • Relates to dishonest or unethical behaviour and practices. • May relate to business behaviour and practices that may cause consumer harm. • Is prohibited under the Company's code of conduct. <p>This policy is not intended to apply to disclosures relating to conduct</p>

	<p>concerning a person's employment (other than as set out in Reportable Conduct) including:</p> <ul style="list-style-type: none"> • personal, work-related grievances such as those relating to harassment, discrimination or disciplinary matters; • alleged workplace discrimination or bullying; • personal disputes between staff; or • decisions regarding the engagement, transfer or promotion of staff. <p>Non-Reportable Conduct should be addressed under the Company complaints processes and these reports do not qualify for protection under the Act.</p>
Tax Act	Taxation Administration Act 1953 (Cth)
Whistleblower	A person who discloses a Reportable Conduct.