

WHISTLEBLOWER POLICY

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1. About the document

PetSure (Australia) Pty Ltd (**PetSure**) is committed to maintaining high standards of ethical conduct and integrity across all aspects of its operations. This Whistleblower Policy (**Policy**) is designed to support that commitment by providing a safe, confidential, and accessible mechanism for individuals (whether internal or external) to report concerns of unethical, illegal, or improper conduct.

This Policy applies to the Boards of PetSure Holdings Pty Ltd (**PetSure Holdings**), PetSure and their subsidiaries (**Subsidiaries**) (collectively "**the Group**" and/or "**the Boards**" as the context requires).

PetSure Holdings is authorised by APRA as a Non-Operating Holding Company (**NOHC**) and is the parent entity of the Level 2 Insurance Group. PetSure is the APRA authorised Level 1 general insurance entity. PetSure is wholly owned by PetSure Holdings.

2. Who is covered by this Policy?

This Policy applies to disclosures made by any individual, including:

- customers;
- members of the public;
- directors or officer of the Group;
- employees, former employees and contractors of the Group;
- an individual who supplies services or goods to the Group (whether paid or unpaid), or an employee of that individual;
- a relative, spouse or dependent of any of the persons listed above .

These individuals are considered to be Eligible Whistleblowers and are eligible to make disclosures qualifying for Whistleblower protections under the Corporations Act 2001 (Cth).

3. Roles and responsibilities

| Role | Responsibilities |
|----------------------------------|---|
| Whistleblower Disclosure Officer | <ul style="list-style-type: none"> • STOPline. • Ensure reports are acknowledged promptly. • Receive disclosures and ensure timely investigation. |
| Whistleblower Support Officer | <ul style="list-style-type: none"> • Person/s appointed to take all reasonable steps to support the Whistleblower through the process of reporting an allegation of wrongdoing and during any subsequent investigation. This support may include: <ul style="list-style-type: none"> ○ keeping in regular contact with the Whistleblower; ○ considering any complaint of retaliation made by the Whistleblower as a result of notifying the Reportable Conduct; ○ responding to any other concerns raised by the Whistleblower in connection with their notification and reporting; ○ providing support to the Whistleblower, where |

| Role | Responsibilities |
|-------------------------------------|--|
| | appropriate, including health and wellbeing resources and protection from any form of retaliation. |
| Whistleblower Investigation Officer | <ul style="list-style-type: none"> • Conduct independent investigations of Reportable Conduct, ensuring no conflict of interest with the area under investigation. • Use internal or external investigative resources as needed, maintaining objectivity. • Report outcomes to the Whistleblower Disclosure Officer. • Ensure the option to refer investigations to external authorities if internal resolutions are insufficient. |

4. Purpose of the Policy

The purpose of this Policy is to set out clear roles, responsibilities, and reporting lines to encourage the confidential reporting of any instances of suspected unethical, illegal, fraudulent or an improper state of affairs involving PetSure or its supply chains to ensure that anyone who makes a report can do so without fear of intimidation, disadvantage or reprisal.

It also aims to promote a culture where individuals feel safe, supported, and confident in reporting wrongdoing without fear of intimidation or retaliation. This Policy also seeks to:

- encourage disclosure of misconduct;
- provide clear guidance on how to make a report;
- ensure that disclosures of misconduct are handled safely, securely and with confidence that they will protect and support Whistleblowers;
- protect individuals who make disclosures from retaliation or disadvantage
- promote a culture of transparency and accountability;
- meet legal and regulatory obligations.

5. What is Reportable Conduct?

A person may make a report, with the benefit of the protections set out in this Policy and under the *Corporations Act 2001* (Cth) where objectively, there are reasonable grounds to suspect that the Group, an employee, contractor or a person who has business dealings with the Group has engaged in conduct ("**Reportable Conduct**") which:

- is dishonest, improper, fraudulent or corrupt;
- is unethical or in breach of a Group policy or breach of legislation;
- is illegal (such as theft, dealing in or use of illicit drugs, violence, bullying, victimisation, harassment, intimidation, criminal damage, breach of competition, consumer, privacy or other law);
- is potentially damaging to the Group, its business interests, its financial or tax affairs or its employees (such as unsafe work practices, environmental damage, or abuse of Group resources);
- a failure to comply with, or a breach of, legal or regulatory requirements, including but not limited to the Corporations Act 2001 (Cth), the Australian

Securities and Investments Commission Act 2001 (Cth), the Financial Sector (Collection of Data) Act 2001 (Cth), the Insurance Act 1973 (Cth), or an instrument made under one of the aforementioned Acts;

- involves modern slavery;
- involves any other kind of misconduct, or an improper state of affairs or circumstances; and
- amounts to abuse of authority or conflict of interest.

Reports made honestly, ethically and on reasonable grounds are protected, even if the reported conduct is later found not to have occurred.

If it is shown that a deliberate false report has been made then that conduct itself will be considered a serious matter and may be subject to legal or disciplinary action.

6. What is not Reportable Conduct?

This Policy does not apply to personal grievances or employment-related matters unless they involve Reportable Conduct as set out in section 5 above.

7. Who can I make a report to?

We encourage honest, transparent communication so anyone can speak up if they are concerned about a matter, even if unsure whether the matter would be considered Reportable Conduct. When making a report, a Whistleblower may identify themselves or utilise an anonymised email address or pseudonym.

7.1 Making a report to an external independent organisation

Anyone can make a report anonymously or with their identity disclosed to:

| To | Details |
|---|---|
| STOPline (Independent third party available in Australia, South Africa and the Philippines) | STOPline is a free reporting service that is independently monitored and offers a translation service wherever needed: <ul style="list-style-type: none"> • directly through https://petsure.stoplينereport.com/; • by phone from Australia to 1300 30 45 50; • by phone from outside Australia reversing charges to +61 3 9811 3275; • by email to petsure@STOPline.com.au; • by downloading STOPline from the iTunes App Store or Google Play; or • by post to STOPline, PO Box 403, Diamond Creek VIC 3089, Australia. Reports may be made anonymously and when contact details are provided, they may only be passed on to the Group with consent. |
| Australian Securities and Investments Commission (ASIC) | <ul style="list-style-type: none"> • online misconduct reporting form; • or to: ASIC, GPO Box 9827, Brisbane QLD 4001. |
| Australian Prudential Regulation Authority (APRA) | <ul style="list-style-type: none"> • by email to pid@apra.gov.au • or to CRO APRA, GPO Box 9836, Sydney NSW 2001. |

7.2 Disclosure to a journalist or parliamentarian

Whistleblowers who disclose information to a journalist or a parliamentarian, only in certain limited circumstances related to public interest or emergencies, are protected by law, as explained in detail on the ASIC [website](#). The following circumstances apply:

- at least 90 days have passed since a disclosure was made to ASIC or APRA;
- a person does not have reasonable grounds to believe that action is being, or has been taken, in relation to the disclosure;
- a person has reasonable grounds to believe that making a further disclosure of the information is in the public interest;
- before making the disclosure, a person has given written notice to ASIC or APRA (as appropriate) that identifies the disclosure and states that the person intends to make a public interest or emergency disclosure;
- a person has reasonable grounds to believe that information subject to the disclosure concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment;
- the extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the journalist or parliamentarian of the substantial and imminent danger.

7.3 Disclosure to a legal representative

Whistleblowers who disclose information to a legal practitioner for the purpose of seeking legal advice or representation are protected by law, even if the legal practitioner concludes that a disclosure is not related to Reportable Conduct.

8. Investigation of Reportable Conduct

Reports will be assessed and investigated promptly and fairly. Investigations may be conducted internally or by independent third parties.

8.1 Assessment

Any report made to a Whistleblower Disclosure Officer, will be detailed in a Disclosure Report. The Whistleblower Disclosure Officer will either:

- Decide that there is not a serious concern that qualifies for protection, and take the appropriate action which may include an internal investigation; or
- Organise for a full investigation by a Whistleblower Investigation Officer.

8.2 Investigation

An investigation will be conducted in an objective and fair manner, or as is reasonable and appropriate having regard to the nature of the Reportable Conduct and the circumstances. The Whistleblower Disclosure Officer may, with consent, appoint a person to assist in the investigation of a report. Where a report is submitted anonymously, the Whistleblower Disclosure Officer may investigate based on the information provided. There may be however circumstances where the Whistleblower Disclosure Officer may not be able to undertake the investigation if it is not able to contact the discloser.

The Whistleblower Disclosure Officer will plan the nature, scope and timeframe for the investigation, which will vary depending on the nature of the disclosure. If not already

appointed due to actual or potential conflict, a Whistleblower Investigations Officer with appropriate expertise and skills and operationally independent from the area under investigation will be appointed. This may be an independent third party.

The Whistleblower Disclosure Officer will provide information to the Whistleblower Investigations Officer where that is reasonably necessary for investigating the issues raised in the disclosure. That will only include the Whistleblower's identity where they have provided their consent for that to be given.

8.3 Communication

The Whistleblower Disclosure Officer will communicate with the Whistleblower. The content, frequency and timeframe of updates will depend on the nature of the disclosure.

The discloser is entitled to remain anonymous or use a pseudonym during the course of the investigation and after the investigation is finalised. The discloser is entitled to refuse to answer any questions put to them (including questions which could reveal their identity at any time) though this may impact the effectiveness of the investigation.

The ultimate decision will be communicated to the Whistleblower.

Where the person who made the report is not satisfied with the conduct or the outcome of the investigation, they can request a review.

9. Protection of Whistleblowers

The Group is committed to ensuring confidentiality in respect of all matters raised under this Policy, and those who make a report are treated fairly and do not suffer detriment. When a person communicates Reportable Conduct to a Whistleblower Disclosure Officer, that person qualifies for protection as a Whistleblower under the Corporations Act 2001 (Cth) from the time they make their disclosure.

Whistleblowers are protected from:

- Civil, criminal, or administrative liability; and
- Retaliation or detrimental treatment.

9.1 Confidentiality

Subject to compliance with legal requirements, upon receiving a report under this policy, the Whistleblower Disclosure Officer will take reasonable steps to keep the Whistleblower's identity confidential and reduce the risk of disclosure in the course of an investigation. The Whistleblower Disclosure Officer will share the identity of a Whistleblower or information likely to reveal their identity if:

- there is consent to do so;
- the concern is reported to ASIC or APRA, the Tax Commissioner or the Australian Federal Police; or
- the concern is raised with a lawyer for the purpose of obtaining legal advice or representation.

If a person believes there has been a breach of their confidentiality, as set out in this section, they may lodge a complaint with ASIC, APRA or the ATO as appropriate or obtain independent legal advice.

9.2 Detriment conduct

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

Where a Whistleblower reasonably believes there has been detrimental treatment as a result of making a report under this policy they should immediately inform a Whistleblower Disclosure Officer.

This Policy does not grant immunity for any misconduct an individual who discloses Reportable Conduct has engaged in themselves.

9.3 Protection of and support for Whistleblowers

The Group will endeavour to protect individuals who disclose Reportable Conduct under this Policy and provide support to them, including in the following ways:

- the Whistleblower Disclosure Officer will consider the risk of detriment against the individual as soon as possible after receiving a disclosure and take any steps considered necessary to reduce that risk;
- individuals may contact the Whistleblower Support Officer directly to discuss concerns they have in relation to the disclosure, and steps that may be taken to reduce those concerns;
- any other support requested by the individual which, in the Group's opinion, is reasonable.

9.4 Support for individuals mentioned in a disclosure

Individuals named in a disclosure will be treated fairly, including by:

- maintaining the confidentiality of those mentions where practical and appropriate in the circumstances;
- advising the individual as and when required and prior to any actions being taken;
- providing an opportunity to respond to any allegations (as appropriate);
- advising the individual of the outcome of any investigation.