

Whistleblower Policy



Ansarada Whistleblower Policy

Purpose

Ansarada Group Limited (“Ansarada” or the “Company”), understands the value of integrity. Ansarada is committed to the highest standards of conduct and ethical behaviour in all of our business activities, and to promoting, increasing awareness, educating, training and supporting a culture of honest and ethical behaviour, corporate compliance and good corporate governance.

We also understand that in the commercial world in which we operate, things sometimes may not be quite right – unfortunately people by their very nature sometimes do the wrong thing, and act contrary to the values we aspire to as an organisation.

We understand that the employees and general stakeholders of Ansarada are often the best source of information when it comes to detecting corrupt, illegal, or other undesirable conduct.

The purpose of this Policy is to:

- (a) Encourages ‘Whistleblowers’ to disclose improper conduct confidentially, anonymously, and on reasonable grounds without the fear of reprisal or detrimental action;
- (b) Explain how to speak up by reporting concerns about wrongdoing;
- (c) Outlining what protections a person who reports wrongdoing will receive; and
- (d) Outline Ansarada’s processes for dealing with reports of wrongdoing.

Creating a supportive environment where people feel safe to speak up in confidence underpins Ansarada’s culture. We understand that when people do not speak up, this undermines the culture and exposes Ansarada to risk – regulatory, financial, and reputational. We have put various measures in place to ensure nobody is discouraged from speaking up, or is disadvantaged or victimised for doing so. This policy, plainly speaking, applies to anybody who may fall under the definition of a ‘Whistleblower’ in any country Ansarada operates in.

Application

This Policy applies to all of the Company’s staff, who include but may not be limited to:

- (a) all Company officers and employees (former and current);
- (b) all Company suppliers and contractors (former and current);
- (c) all Whistleblowers as defined under this Policy and the Whistleblower Laws; or
- (d) all eligible recipients as defined under this Policy and the Whistleblower Laws.

This policy shall be made available to all staff electronically, and shall also be made available publicly through Ansarada’s public facing website.

Who May Make A Report

Anybody with information about potential wrongdoing at Ansarada, regardless of whether they are an employee or general stakeholder, is encouraged to report their concerns under this Policy. Anybody who has any connection with Ansarada – whether that connection is direct or indirect – is encouraged to report accordingly.

What to Report

Any concerns of wrongdoing must be reported. This means any misconduct or improper state of affairs or circumstances in relation to Ansarada.

Examples of wrongdoing may include, but not be limited to:

- (a) Breach of laws or regulations;
- (b) Criminal activity including theft;
- (c) Serious breach of Ansarada's Code of Conduct or Policies;
- (d) Offering or accepting a bribe;
- (e) Dishonest or unethical behaviour;
- (f) Abuse of authority;
- (g) Conduct which may cause financial loss to the Company or damage its reputation or be otherwise detrimental to the Company's interests;
- (h) Harassment, discrimination, victimisation or bullying;
- (i) Conflicts of interest;
- (j) Anti-competitive behaviour;
- (k) Financial fraud or mismanagement;
- (l) Falsifying financial reports or corporate reporting;
- (m) Insider trading;
- (n) Unauthorised use of Confidential Information;
- (o) Improper use of Personal Information as described in Ansarada's Privacy Statement;
- (p) Improper use of Ansarada's physical or intellectual property;
- (q) Conduct endangering health and safety;
- (r) Any deliberate concealment of the above.

Note that wrongdoing does not generally include personal work related grievances – obviously however if a grievance has a significant wide implication for Ansarada, this can be reported via the Whistleblower mechanism as indicated in this policy.

Where to make disclosures

Disclosures can be made to the Senior Legal Risk & Compliance Specialist, or any other officer or senior manager of Ansarada.

Those not wanting to reveal their identify are allowed to make an anonymous report. At all times, Ansarada pledges to protect the confidentiality of the report and the identity of the whistleblower if at any time Ansarada understands the identity of the Whistleblower.

Where no name is provided, Ansarada will assess the disclosure in the same way as if the identity had been revealed, and any investigation will be conducted in the best way possible given the circumstances. However, please note an investigation may not be possible if insufficient information is available to Ansarada. All employees and stakeholders disclosing wrongdoing will be protected.

Responsibility for Policy Compliance

The Senior Legal Risk & Compliance Specialist is responsible for:

- (a) The overall administration of this Policy;
- (b) Monitoring the implementation of, and review of this Policy from time to time;
- (c) Ensuring no Whistleblower is subject to Detrimental Conduct;
- (d) Assisting the Whistleblower maintains a spirit of wellbeing;
- (e) Maintaining Whistleblower confidentiality, as required by law;
- (f) Reviewing and considering any complaints of Detrimental Conduct or any concern that any disclosure has not been dealt with in accordance with this policy;
- (g) Investigating all matters reported under this Policy;
- (h) Maintaining a Whistleblower Register Report of any matter reported containing the investigation's progress and/or outcome
- (i) Presenting the Whistleblower Register Report to the CEO and the Board.

Protecting a Whistleblower's Identity

When reporting wrongdoing, a whistleblower's identity and information that could lead to identification will only be disclosed if:

- (a) The whistleblower expressly gives consent for Ansarada to disclose such information;
- (b) Ansarada considers such disclosure should be made to:
 1. Australian Securities & Investments Commission (ASIC), the Australian Federal Police, or the Commissioner of Taxation;
 2. A Commonwealth authority or a State or Territory authority;
 3. A lawyer for legal advice.

Notwithstanding the above, all reasonable steps shall be taken to prevent discovery of the whistleblower's identity.

Detrimental Conduct Prohibited

Ansarada prohibits all forms of detrimental conduct against whistleblowers. Detrimental Conduct means any actual or threatened conduct that could cause a detriment to the whistleblower as a result of the whistleblower making a disclosure, including:

- (a) Termination of employment;
- (b) Harassment, bullying or intimidation;
- (c) Disadvantage of any nature;
- (d) Unlawful discrimination;
- (e) Any form of harm or damage to reputation;
- (f) Essentially, anything that could be reasonably construed as retaliatory in nature.

Ansarada shall take all reasonable steps to protect the whistleblower from Detrimental Conduct. Ansarada shall also protect all individuals involved in an investigation from Detrimental Conduct.

Specific protections and remedies

The Australian law provides protections for the making of such disclosures, including that:

- (a) The whistleblower shall not be subject to any civil, criminal or administrative liability for making the disclosure (other than for making a false disclosure);
- (b) No contractual or other remedy may be enforced or exercised against the whistleblower on the basis of the disclosure;
- (c) In some limited circumstances (eg. If the disclosure has been made to a regulator such as ASIC), the information provided may not be admissible in evidence against a whistleblower in criminal proceedings or in proceedings for the imposition of a penalty, other than proceedings in respect of falsity of information.

Investigations

Whistleblower disclosures made under this Policy will be documented and investigated promptly. Ansarada takes all reports of potential wrongdoing seriously. All reports will be assessed, and based on the nature and circumstances of the disclosure, a decision will be made as to whether an investigation is required. Any investigation will be conducted in a timely, fair and objective manner, and independently from any person to whom the report relates. Where possible, the person reporting the wrongdoing will be informed as to how Ansarada is responding to their report, and as an end to end process, shall be informed as to progress of the investigation.

Unless there are confidentiality or other reasons not to do so, employees who are the subject of a report shall be informed of the matters raised in the report at an appropriate time, and shall be given a chance to respond to any allegations made against them – at all times, such individuals shall be treated fairly. These employees shall also be advised of the outcome of any investigation.

Special protections under Part 9.4AAA of the Corporations Act 2001 (Cth)

The Corporations Act gives special protection to disclosures about any misconduct or improper state of affairs relating to Ansarada if the following conditions are satisfied:

- (a) The Whistleblower is or has been:
 - 1. An officer or employee of Ansarada;
 - 2. An individual who supplies goods or services to Ansarada or an employee of a person who supplies goods or services to Ansarada;
 - 3. An individual who is an associate of Ansarada; or
 - 4. A relative, dependent, or dependent of the spouse of any individual referred to above.
- (b) The report is made to:
 - 1. The Senior Legal Risk & Compliance Specialist of Ansarada;
 - 2. An officer or Senior Manager of Ansarada;
 - 3. ASIC;
 - 4. APRA; or
 - 5. A legal practitioner for the purpose of obtaining legal advice or representation in relation to the operation of the whistleblower provisions in the Corporations Act;
- (c) The whistleblower has reasonable grounds to suspect that the information disclosed concerns misconduct, or an improper state of affairs or circumstances in relation to Ansarada.

Confidentiality

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

- (a) The discloser expressly consents to the disclosure of their identity;
- (b) The concern is reported to the Commissioner of Taxation or the AFP;
- (c) The concern is raised with a lawyer for the purpose of obtaining legal advice or representation.

Policy Review

This Policy cannot be amended without approval from the Company's Board. This Policy will be reviewed from time to time to ensure that it remains effective, meets best practice standards and the needs of the Company.

Approved and adopted

This Policy was approved and adopted by the Board with effect as of 24 April 2023.