

Whistleblower Policy and Procedures

Overview

RAM Property Funds Management Ltd (**RPFM**) as responsible entity for the RAM Essential Services Property Fund (the **Fund**) and any entities owned, either beneficially or legally, by the Fund or RPFM (together, the **Group**) is committed to the highest standard of conduct and ethical behaviour in its business activities and to promoting and supporting a culture of corporate compliance and honest and ethical behaviour.

The Group encourages the reporting of suspected unethical, illegal, fraudulent, corrupt or dishonest conduct and shall ensure that those who promptly report may do so with confidence and without fear of intimidation, ramifications or adverse consequences.

This Whistleblowing Policy relates to the protection of those 'speaking-up' about misconduct (also known as "whistleblowers") and how RPFM will respond to reports of misconduct.

From 1 July 2019, the whistleblower protections in the Corporations Act have been expanded to provide greater protections for whistleblowers who report misconduct about companies and company officers.

Company officers, company auditors, and other senior people within companies have obligations under the Corporations Act if they receive a report from a whistleblower. Unless these people handle the whistleblower report correctly, they may breach the Corporations Act obligations.

The whistleblower protections include criminal offences and civil penalties for a person causing or threatening detriment to a whistleblower or breaching a whistleblower's confidentiality, including during an investigation into the whistleblower's concerns.

ASIC considers that a strong and effective whistleblower policy is a key component of corporate governance. Respect and fair treatment for whistleblowers, commitment to address whistleblower concerns, and reporting of whistleblower concerns to senior executives and board members will assist a company to manage itself, comply with its obligations, and improve its performance.

Corporate sector whistleblower protection regime

There are specific provisions under Australian legislation which provide whistleblowers with legal rights in relation to certain types of disclosures.

For the Group, the relevant legislation is sections 1317AA to 1317AJ of the *Corporations Act 2001* (Cth) and sections 14ZZT to 14ZZE of the *Taxation Administration Act 1953* (Cth) (the **Whistleblowing Legislation**). The protections under the Whistleblowing Legislation only apply to certain types of disclosures, known as **Qualifying Disclosures**. To assist our staff to understand when those statutory protections are available, additional information about the Whistleblowing Legislation is set out in **Annexure A** and we have identified in this Policy where there are specific requirements under the Whistleblowing Legislation for a report to be a Qualifying Disclosure.

This Policy contains a summary of parts of the Whistleblowing Legislation, and for further detail, you should refer to the text of this legislation. This Policy is not intended to override any rights or obligations you may have under the Whistleblowing Legislation.

A person can access the legal rights and protections for whistleblowers in the Corporations Act if they meet the definition of an 'eligible whistleblower'.

These criteria seek to include most people with a connection to a company or organisation who may be in a position to observe or be affected by misconduct and may face reprisals for reporting it. These people can access the rights and protections in the law from when they report misconduct which includes in addition to the existing criminal offences, for causing or threatening detriment to (or victimising) a whistleblower and for breaching a whistleblower's confidentiality. The protections also extend to the spouses and relatives of these people.

The regime gives protections for whistleblowers in limited circumstances if they disclose to a journalist or parliamentarian after they have reported to ASIC or APRA their concerns about:

- substantial and imminent danger to the health or safety of one or more people or to the natural environment; or
- matters in the public interest after 90 days.

Provides whistleblowers with easier access to compensation and remedies if they suffer detriment, including protections from costs orders unless a court finds the claim to be vexatious or the whistleblower acted unreasonably.

Whistleblowers can provide their name and contact details when they report. They can also report anonymously.

ASIC is responsible for enforcing the corporate sector whistleblower protection regime, including where a whistleblower may suffer detriment for alleging breaches of laws outside of ASIC's regulatory responsibilities.

The regime also applies to whistleblower reports made before 1 July 2019, if a whistleblower's confidentiality is breached or they suffer detriment on or after 1 July 2019.

The eligible whistleblower criteria are set out in the Table below. There is no formal registration process for whistleblowers; the protections apply to anyone who meets the criteria in the Table below.

Criteria	The law requires
<p>Person's role</p>	<p>Must be a current or former:</p> <ul style="list-style-type: none"> • employee of the Group • officer (usually that means a director or company secretary) of the Group • contractor, or an employee of a contractor, who has supplied goods or services to the Group (this can be either paid or unpaid, and can include volunteers) • associate of the Group, usually a person with whom the company or organisation acts in concert and includes directors and secretaries of both RPFM and any related bodies corporate • spouse, relative or dependant of one of the people referred to above. <p>Under the Whistleblowing Legislation, the persons listed above are all eligible whistleblowers (including in relation to Tax Disclosures).</p>
<p>Company or organisation the person's disclosure is about</p>	<p>The organisation disclosure is about must be:</p> <ul style="list-style-type: none"> • a company • a bank • a provider of general insurance or life insurance • a superannuation entity or a superannuation trustee, or • an incorporated association or other body corporate that is a trading or financial corporation. This includes not for-profit organisations that trade in goods or services, lend or borrow money, or provide other financial services, and their trading or financial activities make up a sufficiently significant proportion of their overall activities. Not all not-for-profit organisations are subject to the whistleblower protections.

Criteria	The law requires
<p>Who the person makes the disclosure to</p>	<p>Disclosure must be made to:</p> <ul style="list-style-type: none"> • a director, company secretary, company officer, or senior manager of RPFM and related bodies corporate • an auditor, or a member of the audit team, of the Group or any related body corporate of the Group • an actuary of the Group or any related body corporate of the Group • a person authorised by the company or organisation to receive whistleblower disclosures • ASIC or the Australian Prudential Regulation Authority (APRA), or • their lawyer. <p>Under the Whistleblowing Legislation, the persons listed above are all eligible recipients.</p> <p>Additionally, the Whistleblowing Legislation allows whistleblowers to make Tax Disclosures to the following eligible recipients:</p> <ul style="list-style-type: none"> • a registered tax agent or Business Activity Statement (BAS) agent who provides tax agent services or BAS services to RPFM • any other employee or officer (within the meaning of the Corporations Act) of the Group who has functions or duties that relate to the tax affairs of the Group • the Commissioner of Taxation (ATO) <p>While disclosure must be to one of these people or organisations, concerns can be raised anonymously.</p>

<p>Subject of the person's disclosure</p>	<p>Must have reasonable grounds to suspect that the information disclosed concerns:</p> <ul style="list-style-type: none"> • misconduct (which includes fraud, negligence, default, breach of trust and breach of duty) or an improper state of affairs in relation to the Group or any related body corporate of the Group; or • misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of the Group or an associate of RPFM (Tax Disclosures) <p>together, Reportable Conduct for the purposes of this policy. The Reportable Conduct described above would also be a 'disclosable matter' under the Whistleblowing Legislation.</p> <p>In addition, you should also report any other conduct or activity which you reasonably believe poses a significant risk to our employees, the community, our property, our operations or our reputation. Reports in relation to such conduct will be treated as Reportable Conduct under this policy even if the conduct you report is not a disclosable matter under the Whistleblowing Legislation.</p> <p>This information can be about the company or organisation, or an officer or employee of the company or organisation, engaging in conduct that:</p> <ul style="list-style-type: none"> • breaches the Corporations Act; • breaches other financial sector laws enforced by ASIC or APRA; • breaches an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months; • represents a danger to the public or the financial system; • dishonest, corrupt, fraudulent or unlawful conduct or practices, including bribery; • financial irregularities; • unfair, dishonest or unethical dealings with a customer or third party; • unethical or serious improper conduct including breaches of any legal or regulatory obligations, breaches of the Group's Policies (such as the Code of Conduct or Anti-Bribery and Compliance Policy) and engaging in misleading or deceptive conduct especially in relation to accounting or financial reporting practices; • any other kind of serious impropriety; or • any other conduct or act that may cause loss to the Group or which may otherwise be detrimental to the Group's interests including unsafe work practices or abuse of the Group's property or resources.
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Criteria	The law requires
	<p>'Reasonable grounds' means that a reasonable person in the persons position would also suspect the information indicates misconduct or a breach of the law.</p> <p>Note a report solely about a personal work-related grievance is not covered by the protections.</p> <p>Some examples of matters which should not be reported under this policy include:</p> <ul style="list-style-type: none"> • a staff member's dissatisfaction with their pay (unless the staff member's grievance relates to discriminatory conduct); and • a staff member's failure to receive a promotion on grounds unrelated to discriminating conduct.
<p>How to make a report</p>	<p>Disclosures are most useful when they include key information that offers actionable insight. Disclosures should include as much of the following information as possible if known by the person reporting the misconduct:</p> <ul style="list-style-type: none"> • What occurred – describe the act that is suspected or has been witnessed. It is useful to also describe what should have happened, so the report taker is clear about the nature of misconduct being described. Report what occurred; the sequence of events leading up to witnessing the act; steps observed and any actions taken to confirm suspicions or observations. • How the misconduct was executed – describe any factors that may have enabled the misconduct or contributed to misconduct going undetected, being concealed or being previously unidentified. • Where it occurred – the physical location/address that the misconduct occurred; the work location of those perpetrating misconduct or the location where the misconduct was observed. • When the misconduct occurred – key dates of actions suspected or observed relating to the misconduct being disclosed. If a series of events occurred, offer these in chronological order if possible. • Who was involved – offer names and job titles of those associated with the misconduct if known or information that may help identify those that may have been associated with the misconduct. Also offer names of others that may have witnessed or played a role in the acts being reported.

Criteria	The law requires
No time limit on reports	<p>There is no time limit associated with making whistleblowing reports. However, the sooner misconduct is reported and the more likely it is that reliable evidence will be able to be gathered as part of any investigation and the Group can address the matter.</p> <p>There may be limitations regarding legal action that can be taken in response to proven allegations but this should not deter whistleblowers from making a disclosure about misconduct they have reasonable grounds to believe occurred. All disclosures can assist the Group to refresh risk management monitoring, training and controls.</p>
Anonymous reports	<p>Whistleblowers are able to make an anonymous report and they will still be entitled to the protections set out in this Policy and under the Whistleblowing Legislation if the other requirements for making the disclosure are complied with.</p>
Disclosures outside of the Group	<p>Generally, only reports that are made to eligible recipients set out above in 'Who the person makes the disclosure to' will ensure protections are afforded to the whistleblower making the report. Making reports to others outside the Group will not obtain the protection of the Whistleblowing Legislation or any other protections provided by this Policy. This is because it is important to ensure that confidential information belonging to the Group is not disclosed outside of the Group.</p> <p>There are two categories of disclosure that a whistleblower may make to a journalist or a Member of Parliament and still obtain the protections of the Whistleblower Legislation. These are called Public Interest Disclosures and Emergency Disclosures and further details are contained in Annexure A.</p> <p>Unless a disclosure is being made under those provisions, speaking to a journalist or a member of parliament about confidential information in relation to the Group without authorisation is not permitted and may be a disciplinary offence.</p>

RAM Property Funds Management Limited Whistleblower Procedures

Link between the Group's other policies

This policy should be read together with the following internal policies:

- The Employee Hand Book;
- the Code of Conduct;
- the Anti-Bribery and Corruption Policy;
- the Security Trading Policy; and
- the Communications and ASX Disclosure Policy

These policies can be found on the Group's website at: www.ramgroup.com/investment-offering/ram-essential-services-property-fund

Handling revelations from a whistleblower

Under the Corporations Act you can only pass on the revelation and the identity of the whistleblower (or information that may lead to the identity of the whistleblower) under the following circumstances:

- You can pass it onto ASIC, APRA or the Australian Federal Police without asking for the whistleblower's permission.
- You can only pass it onto a third party if the whistleblower has given their consent. This means, for example, that a company secretary cannot pass on the revelation to members of the board or the CEO unless the whistleblower has consented to them doing this.

Fair treatment of employees that are the subject of a disclosure

The Group is also committed to ensuring the fair treatment of employees and other persons engaged by the Group who are mentioned in reports of Reportable Conduct, or to whom such disclosures relate. Fair treatment of those persons implicated in a misconduct disclosure includes but is not limited to the following:

- the opportunity to be 'heard' on, and respond to the allegations as against them before any adverse findings are made against them; and
- the opportunity to have their responses considered by the Group and, in appropriate circumstances, investigated.

During any investigation into a disclosure of Reportable Conduct, the Group extends support and protection to employees, officers and others engaged by the Group and implicated in the report until such investigation has concluded and claims have been proven or dismissed. Any suspected adverse or detrimental treatment in this regard should be reported to the Group's Company Secretary so that these matters may be addressed.

The Group will endeavour to respond promptly to any complaints raised by parties who are the subject of a disclosure where such party has concerns about unfair treatment in the context of assessment of, and investigation into the Reportable Conduct.

Proven misconduct

The Group reserves the right to institute performance management or take other disciplinary action, including termination or employment or engagement, in relation to those found to have committed corporate misconduct.

The Group also reserves the right to refer matters to law enforcement or regulatory bodies at any time should the misconduct in the Group's reasonable opinion warrant such a referral.

How we will support whistleblowers and protect them from detriment

RPFM 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 disciplinary, discriminatory or other adverse action.

Protection against disciplinary, discriminatory or other adverse action.

The Group is committed to protecting and respecting the rights of a person who reports Reportable Conduct. The Group will not tolerate any detriment caused, or threatened to be caused against any person who has made or who is believed to have made a report regarding Reportable Conduct. Under the Whistleblowing Legislation, "detriment" is defined to include, without limitation, any of the following:

- dismissal;
- injuring an employee in their employment, (e.g. not giving an employee legal entitlements such as pay or leave);
- changing an employee's job to their disadvantage;
- offering a potential employee different (and unfair) terms and conditions for the job, compared to other employees;
- discriminating between employees to the disadvantage of a whistleblower;
- harassment or intimidation of a person;
- harm or injury to a person, including psychological harm;
- not hiring someone because they have been a whistleblower;
- damage to a person's property, reputation, business or financial position; or
- any other damage to a person.

Any victimisation, retaliation or detriment caused or threatened to be caused in reprisal for a report regarding Reportable Conduct being made under this Policy will be treated as misconduct and may result in disciplinary action, which may include dismissal (or termination of engagement).

If you are subjected to detriment connected with making a report under this policy you should inform the person whom you made the disclosure to or the Chairman of the Board.

Protection of your identity and confidentiality

If you do disclose your identity and you are an eligible whistleblower who is making a disclosure protected by the Whistleblowing Legislation to an eligible recipient, the recipient has an obligation to keep your identity confidential. This includes keeping confidential information which could lead to the disclosure of your identity.

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

- i. you consent;
- ii. the concern is reported to the Australian Securities and Investments Commission ("ASIC"), the Australian Prudential Regulation Authority

("APRA"), the Tax Commissioner or the Australian Federal Police ("AFP"); or

- iii. the concern is raised with a lawyer for the purpose of obtaining legal advice or representation. If RPFM 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.

Under the Whistleblowing Legislation, it is also permissible to:

- disclose information regarding the suspected or actual wrongdoing disclosed without revealing the whistleblower's identity or information that is likely to lead to the identification of the whistleblower;
- disclose information other than the whistleblower's identity if it is reasonably necessary for the purposes of the investigation and all reasonable steps are taken to reduce the risk that the whistleblower will be identified;
- disclose the identity of a whistleblower, or information likely to lead to his or her identification to a legal practitioner for the purposes of obtaining legal advice or representation in relation to the disclosure; or
- disclose the identity of a whistleblower where such disclosure is made with the consent of the whistleblower.

In order to allow for a proper investigation of the matter, and to provide support to the whistleblower, the recipient of your disclosure may ask you to consent to the disclosure of your identity to any persons reasonably necessary for the purposes of investigating matters the subject of your disclosure.

If you are the recipient of a report from a whistleblower relating to Reportable Conduct you must not reveal the identity, or information that is likely to lead to identification, of the whistleblower without the written consent of the whistleblower or without the express permission from the RE to make the disclosure. Such action may constitute a criminal offence.

Whistleblowers can be assured that any information released in breach of this Policy will be treated seriously and may result in disciplinary action, potentially including dismissal. A breach of this Policy may in certain circumstances also result in criminal sanctions.

Potential Fines

In addition to potential disciplinary action, significant penalties may apply to persons who fail to maintain whistleblower protections under Whistleblowing Legislation.

Such fines and associated responsibility will remain the responsibility of the employee and will not be paid by RPFM.

Whom disclosures that qualify for protection under the law may be made

RPFM recommends that disclosures that qualify for protection under the law may be made to RPFM’s Company Secretary or the Chairman of RPFM’s Board and that disclosures be made in writing. Disclosures may also be made to any Director of RPFM’s Board or RPFM’s auditor.

Consideration should be given to ensuring the policy recommends that whistleblowers make their revelations directly to an appropriate person, such as chairman of the audit committee of the Board or some other person as required by another regulator or overseas regulatory requirement relevant to RPFM.

How we will investigate disclosures that qualify for protection under the law

RPFM will investigate all disclosures that qualify for protection under the law. RPFM will handle your reports and personal information to protect your identity and ensure confidentiality during any investigation.

RPFM will investigate all matters reported under this policy as soon as practicable after the matter has been reported. Where appropriate, RPFM 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 subject of the disclosure 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 person who disclosure of the matter was made 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, RPFM will conduct the investigation and its enquiries based on the information provided to it.

In order to ensure that any investigations and actions undertaken are fair and unbiased, it may be necessary to:

- obtain specialist, independent advice including trained investigation staff from either inside the Group or refer the matter confidentially to a third-party investigation firm, if deemed appropriate having regard to the nature of the Reportable Conduct;
- appoint a person to assist in the investigation of a matter the subject of a report; or
- refer the matter to the police or law enforcement where disclosures refer to criminal behaviour.

In the conduct of an investigation, the Group may proceed as follows:

- speak to anyone who may be affected or involved in the disclosure so that they are provided with the opportunity to respond to the allegation(s);
- consider these responses; and
- speak to witnesses (where there is a dispute as to the facts surrounding the allegations).

In certain circumstances, where the Group decides it is appropriate to do so, it may also place any persons affected by the report or the whistleblower on paid leave during part or all of the investigation.

Any whistleblowers who reveal their identity may be asked to participate in subsequent confidential interview(s) in relation to the claims made in the

disclosure including to clarify facts supplied in order to proceed with further investigation.

Criminal or civil liability

The whistleblower is not protected from civil or criminal liability for any of his or her conduct which may be revealed by the report. However, if a whistleblower reports such conduct and actively cooperates in an investigation in which they may be implicated, there may be some cases where the fact they have made a report will be taken into account as a mitigating factor when determining actions which may be taken against them.

False reports

Whistleblowers must have reasonable grounds for the claims made in their disclosures.

Where it is shown that a person making a report has made malicious, false or vexatious allegations of improper conduct, then the making of that report will be considered a serious matter and may render the person concerned subject to disciplinary proceedings which may include demotion, suspension or termination of employment. However no action will be taken against an employee who makes a report, based on reasonable grounds to suspect misconduct or an improper state of affairs, which is not substantiated in a subsequent investigation.

Training

The Compliance Manager will train all staff on this policy and check on the effectiveness of the processes related to this policy on an annual basis.

Training will focus on the importance of obtaining the whistleblower's consent to pass the information on to necessary third parties so that it can be investigated or its impact assessed.

Employee whistleblowing training

The Group will conduct periodic training for employees on this policy and their rights and obligations under it. This training will include, but is not limited to, information on the following:

- the legislative whistleblowing regime and how this policy interacts with statutory protections;
- the kinds of matters that are disclosable under this policy and the Whistleblowing Legislation;
- the process of making a disclosure (including to whom a disclosure can be made);
- the Group's investigation processes; and
- support that Group offers to whistleblowers and persons who are the subject of a disclosure.

Recipient whistleblowing training

The Group will conduct periodic training for those persons who may receive whistleblowing reports. This training will include, but is not limited to, the following:

- how to receive reports and obtain essential information;
- how best to protect the anonymity of the discloser (if an anonymous disclosure has been made) and the confidential nature of the disclosure;
- how to assist with, and where appropriate, conduct the investigation process; and
- how to provide continued support to whistleblowers and persons who are the subject of a disclosure.

How this Policy will be made available to RPFM officers and employees

This policy will be made available on RPFM's website. In addition, the Compliance Manager will make it available to officers and employees of RPFM on induction and thereafter on an annual basis.

Annexure A - Additional Information about the Whistleblowing Legislation

1. Whistleblowing Legislation

The protections under the Whistleblowing Legislation only apply to certain types of disclosures, known as Qualifying Disclosures. Although this policy contains a summary of the relevant sections of those laws you should refer to the law itself for more information.

If a whistleblower makes a Qualifying Disclosure (the requirements for which are summarised below), they will be entitled to protections under the Whistleblowing Legislation. In addition, the Group will extend these protections to all whistleblowing reports made in accordance with this policy, even where a report does not amount to a Qualifying Disclosure under the Whistleblowing Legislation.

2. Qualifying Disclosures

For a whistleblower to obtain the protections set out in the Whistleblowing Laws, the whistleblower must:

- be an 'eligible whistleblower'. A list of eligible whistleblowers for the Group is set out above in the 'Person's role' criteria.
- be reporting on a 'disclosable matter'. A 'disclosable matter' is one that relates to misconduct (including fraud, negligence, default, breach of trust or duty) or an improper state of affairs in relation to the Group or any related body corporate of the Group. However, as noted above in the 'Subject of the person's disclosure' criteria, the Group will extend the protections under the Whistleblowing Legislation to all whistleblowing reports made in accordance with this Policy, even where that conduct may not amount to a 'disclosable matter'.
- report that disclosable matter to an 'eligible recipient'. A list of eligible recipients for RAM Group is set out above at the 'Who the person makes the disclosure to' criteria.

If a whistleblower meets these three criteria they have made a 'Qualifying Disclosure' and are entitled to protections under the Whistleblowing Legislation.

3. Additional Examples of Reportable Conduct

The following are some examples of conduct where if you had reasonable grounds to suspect they had occurred that would be a disclosable matter if reported:

- an offence against or a contravention of the Corporations Act 2001 or the Australian Securities and Investments Commission Act 2001. This would include conduct such as misleading and deceptive conduct, insider dealing and market manipulation.
- an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more. This would include conduct such as bribery of a Commonwealth Public Official; or
- conduct that represents a danger to the public or the financial system.

In relation to Tax Disclosures, the whistleblower must have information relating to misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of the Group or an associate of the Group. The whistleblower must consider the information they possess may assist the eligible recipient to perform functions or duties in relation to the tax affairs of Group or an associate of Group.

'Personal work-related grievances' are excluded from whistleblowing protections and **should not be reported** under this policy. Personal work-related grievances are generally those grievances about any matter in relation to the whistleblower's employment (or former employment), having implications for the whistleblower personally (e.g. a staff member's dissatisfaction with their pay).

4. Protections afforded to the Whistleblower

Legal immunity

Whistleblowers who make a Qualifying Disclosure will not be subject to any civil, criminal or administrative liability for making the disclosure. No contractual or other remedy may be enforced against them on the basis of their disclosure.

There is no immunity from any action in relation to misconduct that the whistleblower was involved in, but Qualifying Disclosures will be inadmissible in relation to any such proceedings.

Confidentiality & Anonymity

Revealing the whistleblower's identity, or any information which is likely to lead to their identification, is a criminal and civil offence.

Protection from detrimental conduct

Causing 'detriment', or threatening such conduct, to any person because it is believed that a disclosure has been made under this Policy constitutes a criminal and civil offence.

5. Public Interest and Emergency Disclosures

Under the Whistleblowing Legislation there are two categories of protected disclosures which will protect whistleblowers who report to a journalist or a member of parliament. Except for these protected disclosures, disclosures to journalists or parliamentarians are not permitted unless expressly authorised by the Company Secretary.

Public Interest Disclosure - this category allows a whistleblower to make a disclosure to a journalist or parliamentarian if:

- the whistleblower has previously made a disclosure to ASIC, APRA or any other prescribed Commonwealth authority;
- at least 90 days have passed since the disclosure was made to ASIC, APRA or any other prescribed Commonwealth authority;
- the whistleblower does not have reasonable grounds to believe that action is being taken to address the matters to which the previous disclosure related;
- the whistleblower has reasonable grounds to believe that making a further disclosure of the information would be in the public interest; and
- following the end of the 90 day period, the whistleblower gives the body to which the previous disclosure was made a written notification that includes sufficient information to identify the previous disclosure and states that the whistleblower intends to make a public interest disclosure.

Emergency Disclosure - this category allows a whistleblower to make a disclosure to a journalist or a parliamentarian if:

- the whistleblower has previously made a disclosure to ASIC, APRA or any other prescribed Commonwealth authority;
- the whistleblower has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment; and
- the whistleblower gives the body to which the previous disclosure was made a written notification that includes sufficient information to identify the previous disclosure and states that the whistleblower intends to make an emergency disclosure.

For both Public Interest and Emergency Disclosures, the extent of the information disclosed must be no greater than is necessary to appropriately inform the recipient of the relevant misconduct or substantial imminent danger.

6. Penalties

Under the Whistleblowing Legislation, a person may bring civil proceedings for a compensation order or pursue civil penalties even when a criminal prosecution has not been, or cannot be, pursued.

Contravention	Penalty
Civil penalty provisions (<i>Corporations Act</i>)	
Breach of confidentiality of identity Victimisation or threatened victimisation	For an individual: <ul style="list-style-type: none"> • 5,000 penalty units (\$1.05m); or • three times the benefit derived or detriment avoided. For a body corporate: <ul style="list-style-type: none"> • 50,000 penalty units (\$10.5m); or • three times the benefit derived or detriment avoided; or • 10% of the body corporate's annual turnover up to 2.5 million penalty units (\$525m).
Criminal offences (generally under the <i>Corporations Act</i> and <i>Taxation Administration Act</i>)	
Breach of confidentiality of identity	<ul style="list-style-type: none"> • 60 penalty units (\$12,600); or • six months imprisonment; or • both.
Victimisation or threatened victimisation	<ul style="list-style-type: none"> • 240 penalty units (\$50,400); or • two years imprisonment; or • both.