



WHISTLEBLOWER POLICY

1.0 Overview

1.1 Introduction

Section 1317AI of the Corporation Act 2001 requires that public companies have a Whistleblower policy in place that sets out:

- information about the protections available to whistleblowers, including protections
- information about to whom disclosures that qualify for protection under this Part may be made, and how they may be made
- information about how the company will support whistleblowers and protect them from detriment
- information about how the company will investigate disclosures that qualify for protection
- information about how the company will ensure fair treatment of employees of the company who are mentioned in disclosures that qualify for protection, or to whom such disclosures relate
- information about how the policy is to be made available to officers and employees of the company

This Whistleblower Policy (this “**Policy**”) sets out the procedures that Angle Auto Finance Pty Limited (“**Angle Auto**”) and its employees, contractors, officers and directors (collectively referred to as “**staff**”) have in place to assist in identifying wrongdoing that may not otherwise be uncovered. Additionally, the Policy also extends to any relevant external body corporates that may raise a concern (i.e., former employees).

This Policy will be made available to officers and employees, internally, on the Angle Auto intranet and, externally, on the Angle Auto website.

1.2 Purpose

Angle Auto is committed to maintaining the highest standards of integrity and conduct in its operations. The Code of Conduct sets out the expected behaviours and values, and we are committed to fostering a culture where you feel safe to speak up if you observe or suspect conduct that concerns you. This Policy is an important tool for helping Angle Auto identify wrongdoing that may not otherwise be uncovered.

If you are aware of possible wrongdoing, we encourage you to speak up about it. This Policy aims to:

- Encourage reporting about suspected misconduct or any improper state of affairs (including tax affairs);
- Inform whistleblowers about the protections available to them, the avenues for safely reporting misconduct, and the steps that we will take to investigate whistleblower reports; and
- Deter anyone who might be inclined to cause detriment to a person who has made, or is perceived to have made, a whistleblower report.

This Policy is intended to apply to all personnel of Angle Auto whether full-time, part-time, casual, fixed term or contractors.

1.3 Scope

All individuals who identify or suspect misconduct or an improper state of affairs or circumstances in relation to Angle Auto [or a related body corporate] are encouraged to speak up and report their concerns. However, to qualify for protections as a whistleblower under Part 9.4AAA of the Corporations Act 2001 (Cth) or Part IVD of the Taxation Administration Act 1953 (Cth) (**Whistleblower Laws**) as outlined in this Policy you must:

- Be an '*Eligible Whistleblower*';
- Who makes a disclosure about a '*Disclosable Matter*';
- Directly to an '*Eligible Recipient*', or to certain other bodies as specified in section 2.6.

If you have any concerns about whether this Policy applies to you or whether your report will be protected under the Whistleblower Laws, please contact the Whistleblower Protection Officer (WPO) – the General Counsel – or seek independent legal advice (not from a lawyer employed by Angle Auto). The WPO is responsible for ensuring the provisions of this policy are properly enacted. Angle Auto's Board of Directors are committed to overseeing this policy and ensuring the protection of whistleblowers and treating disclosures confidentially. Your disclosures to a legal practitioner for the purposes of obtaining legal advice are protected under the Whistleblower Laws (even if the legal practitioner concludes that your disclosure is not a disclosable matter).

2.0 Making a Whistleblower Report

2.1 Eligible Whistleblower

You are an '*Eligible Whistleblower*' if you are a:

- Current or former officer or employee of Angle Auto;
- Current or former individual supplier, or officer or employee of a supplier to Angle Auto (paid or unpaid);
- Current or former associate of Angle Auto (including the directors and secretary of Angle Auto, and those of related bodies corporate); or

- A relative or dependent of any of the above, or an individual's spouse, or a dependent of an individual's spouse,

and you are otherwise eligible to report relevant concerns within the scope of this Policy or the Whistleblower Laws.

2.2 Disclosable Matter

We encourage you to report any concerns you may have about any misconduct or an improper state of affairs or circumstances (including tax affairs¹), or that you think may be illegal, in relation to Angle Auto or a related body corporate.

Your disclosure will be a '*Disclosable Matter*' if you have reasonable grounds to suspect that it:

- Concerns conduct that is illegal, fraudulent, dishonest, corrupt, unethical, a material breach of an internal policy, any misconduct or an improper state of affairs in relation to Angle Auto or a related body corporate including in relation to the tax affairs of Angle Auto or one of its associates; or
- Concerns conduct that may be an offence against, or contravention of, a provision of any of the following legislation:
 - the *Corporations Act 2001*;
 - the *ASIC Act 2001*;
 - the *Banking Act 1959*;
 - the *Financial Sector (Collection of Data) Act 2001*;
 - the *Insurance Act 1973*;
 - the *Life Insurance Act 1995*;
 - the *National Consumer Credit Protection Act 2009*;
 - the *Superannuation Industry (Supervision) Act 1993*;
- Represents a danger to the public or the financial system.

Examples may include:

- Money laundering or misappropriation of funds.
- Offering or accepting a bribe.
- Financial irregularities.

You can still qualify for the whistleblower protections if you have reasonable grounds to suspect that there is a Disclosable Matter, even if the report turns out to be incorrect.

If you make a report that is not about a Disclosable Matter or if you make a report that you know to be untrue, you will not qualify for the specific protections under the Whistleblower Laws.

2.3 Personal Work-Related Grievances

This Policy does not apply to personal work-related grievances you raise, and the protections under the Whistleblower Laws do not apply to personal work-related grievances.

¹ Tax affairs means affairs relating to any tax imposed by or under, or assessed or collected under, a law administered by the Commissioner of Taxation.

Personal work-related grievances are those that are related to your current or former employment and have, or may have, implications for you personally. Personal work-related grievances are those that are not a “*Disclosable Matter*” as set out in paragraph 2.2 above.

Examples of personal work-related grievances may include:

- interpersonal conflicts between you and another employee;
- a decision relating to your engagement, transfer or promotion;
- a decision to suspend or terminate your engagement or otherwise subject you to disciplinary action;
- a decision about the terms and conditions of your engagement;
- a decision that does not involve a breach of workplace laws.

An exception is if a grievance is about retaliation and detriment suffered by you because you have made a whistleblower report to us or if your personal work-related grievance relates to a broader matter that is likely to have significant implications for Angle Auto.

Retaliation and detriment are discussed in section 3.1.2.

If you would like to raise a personal work-related grievance, you should speak to:

- Your Leader; or
- Your one-over Leader; or
- Your HR business partner at peoplesupport@angleauto.com.au; or
- General Counsel

2.4 Eligible Recipients

To qualify for protection as a whistleblower under the Whistleblower Laws, you will need to make a disclosure about a Disclosable Matter directly to an '*Eligible Recipient*', or to one of the parties listed in section 2.6. Eligible Recipients include officers and senior managers of Angle Auto and its related body corporates as defined in the Corporations Act, some of which are listed below. Angle Auto recommends that you make a disclosure about a Disclosable Matter in person, by phone, by email or otherwise in writing to any of the following nominated Eligible Recipients because it is their role to receive such disclosures:

- General Counsel
- Chief Risk Officer
- Chief Executive Officer

If you are reporting your Disclosable Matter by email (whistleblower@angleauto.com) or in writing to (Level 23, 400 George Street, Sydney NSW 2000) to help us identify and handle your report efficiently and effectively, please identify your report with the words 'Whistleblower report' and mark it as confidential. However, if you do not identify the report this way it will not stop it from qualifying for protection under the Whistleblower Laws.

2.5 External Reporting Process

If you are not comfortable or able to report misconduct internally, you may report it to Angle Auto's external and independent whistleblowing service provider.

Angle Auto has contracted Your Call Whistleblowing Solutions (“**Your Call**”) to receive and

manage your report with impartiality and confidentiality.

This option allows you to:

- remain completely anonymous;
- identify yourself to Your Call only; and
- identify yourself to both Your Call and Angle Auto.

The Your Call reporting options include:

- *Website* <https://www.yourcall.com.au/report>
24/7
- *Telephone* 1300 790 228
9am and 12am, recognised business days, AEST

Online reports can be made via the website address listed above. You will be required to enter the Angle Auto unique identifier code (AAF).

Your Call remains the intermediary at all times, receiving and forwarding communication between all parties. The Angle Auto Officers, specified in section 2.4, will have access to your reports. However, Your Call can circumvent any of these Officers upon your request.

You be able to securely upload any relevant documentation and/or material relevant to your disclosure.

After making a disclosure, you will be provided with a unique Disclosure Identification Number (DIN) and access to a secure online Message Board.

The Message Board allows ongoing anonymous communication with Your Call and/or Angle Auto. Your Call remains the intermediary at all times, receiving and forwarding communication between all parties. The Message Board can be used to receive updates, share further information/evidence and request support or report retaliation. If you cannot access the Message Board, you can contact Your Call via phone (above) for verbal updates.

National Relay Service

If you are deaf, or have a hearing or speech impairment, you can contact Your Call online or through the National Relay Service. Simply choose your contact method at www.relayservice.gov.au and request Your Call's hotline 1300 790 228.

If you have difficulty speaking or understanding English, contact us through the [Translating and Interpreting Service](#) (TIS) [131 450](tel:131450) and ask for Your Call on 1300 790 228.

2.6 Disclosure to regulators and public interest disclosures

You may also qualify for protections under the Whistleblower Laws in the following circumstances:

- You report a Disclosable Matter to a regulator such as ASIC, APRA, Australian Federal Police, a legal practitioner or any other Commonwealth regulator and, for tax affairs, to the Commissioner of Taxation;
- You make a public interest disclosure to a journalist or parliamentarian; or
- You make an emergency disclosure to a journalist or parliamentarian.

Before making a public interest disclosure or emergency disclosure, you should seek independent legal advice. To make a disclosure of this nature, you must have previously made a disclosure to a regulator, such as ASIC or APRA, and provided written notice to that regulator. To make a public interest disclosure, at least 90 days must have passed since your disclosure to the regulator.

2.7 Contents of a Disclosable Matter

When you make a disclosure, please provide as much information as you can, including, if possible:

- Details of the alleged misconduct of your Disclosable Matter.
- Where and when the misconduct occurred, such as dates, times and location.
- The person implicated in the misconduct including name and surname, description of the person, title and department.
- An explanation of why the conduct is improper, if the nature of the misconduct is not otherwise apparent.
- Details of potential witnesses including names and surnames, descriptions of persons, titles and departments.
- Supporting evidence or location where supporting evidence can be found such as tangible evidence of the misconduct, supporting documentation or security footage.
- Any other information that you believe is relevant to the Disclosable Matter.

2.8 Remaining Anonymous

Yes, if you make a Protected Disclosure, you may remain anonymous and still receive protections under the Whistleblower Laws. However, Angle Auto's ability to investigate the disclosure, and take action in respect of it, may be limited if you remain anonymous. For example, we may not be able to clarify essential information about your report if we cannot contact you.

When investigating your Protected Disclosure, we may need to disclose information other than your identity that could lead to your identification to our investigations team and other persons who are assisting with the investigation because it is necessary for the purpose of the investigation. We will take all reasonable steps to minimise the risk that you will be identified in these circumstances.

3.0 Whistleblower Protections

There are a significant range of protections available to persons making a Protected Disclosure under Whistleblower Laws, and serious potential civil and criminal penalties exist for breaching these protections.

Angle Auto takes all appropriate actions to ensure that it complies with the obligations under Whistleblower Laws, especially, its confidentiality obligations, to ensure all employees feel safe and able to report incidents.

3.1 Protections Afforded to Those who make a Protected Disclosure

3.1.1 Identify protection (confidentiality)

If you make Protected Disclosure, Angle Auto cannot disclose your identity to any person unless:

- You provide your consent;
- The concern is reported to an authority (eg, ASIC, APRA or the Australian Federal Police, or for tax affairs to the Commissioner of Taxation); or
- It is seeking legal advice about whether or not the Whistleblower Laws apply to your report.

It should be noted that in the case of information that is likely to identify you, we may share the information for the purposes of the investigation, and only if it is reasonably necessary to do so. Whilst we will take reasonable steps to reduce the risk of your identity being disclosed, in some circumstances, it is possible that your identity may be decipherable due to the very nature of the Protected Disclosure. Any non-identifying content of your Protected Disclosure may need to be shared with the Board and other governance committees of Angle Auto.

3.1.2 Protection from detrimental acts or omissions

Angle Auto does not tolerate any conduct or action, or threats of any conduct or action, that retaliates against or causes detriment to any person because of a belief or suspicion that the person has made or could make a Protected Disclosure. Detrimental acts or omissions include: termination of employment, harassment, bullying or intimidation, personal or financial disadvantage, unlawful discrimination, harm/injury including psychological harm/injury, or other retaliatory conduct. Any employee who is found to engage or threaten to engage in this kind of conduct will be subject to disciplinary action (up to and including the termination of their employment).

The following conduct will not, however, constitute detrimental or retaliatory conduct:

- Administrative action that is reasonable for the purpose of protecting you from detriment (e.g., if you have made a Protected Disclosure about matters in your immediate work area and you are moved to another office); and
- Managing your unsatisfactory work performance if the action is in line with Angle Auto's performance management framework.

If you become aware of detrimental or retaliatory conduct, you should report it immediately to the WPO.

Any conduct or action, or threats of any conduct or action, that retaliates against or causes detriment to any person who is protected by whistleblower provisions is an offence and carries a civil penalty provision.

3.1.3 Compensation and other court orders

In specific circumstances, you may be able to seek compensation under the Whistleblower Laws if you have suffered any detriment because you made a report about a Disclosable Matter.

3.1.4 Immunity from lawsuit and other protections

If you make a Protected Disclosure, you are protected from exposure to certain legal liability in relation to that report.

If you would like further information about protections that may be available, you should seek independent legal advice.

3.1.5 Escalations

If you are concerned that you may be, are being or have been subjected to detrimental conduct you should approach the WPO. The WPO will consider the concerns raised and may take such action as the WPO considers appropriate.

If you consider that the WPO has not adequately dealt with or resolved your complaint regarding the detrimental conduct you may request that the WPO escalate the issue to the Chair of the Audit & Risk Committee.

4.0 Investigations

If you make a Protected Disclosure, Angle Auto will consider whether an investigation is required and what structure and method the investigation will adopt. Where appropriate and reasonably possible, you will be informed of the structure, method, and progress of the investigation.

Angle Auto may, ultimately, not be able to investigate a disclosure or respond to the matters reported. This may be the case where it is not possible to contact the discloser (for example, if the discloser is anonymous), to obtain further information required.

Investigations may occur without the knowledge of the people identified in the report, either to keep the identity of the person making the whistleblower report confidential or to prevent people from suffering detriment because of the report.

If Angle Auto determines that the information you have disclosed does not amount to a Disclosable Matter, you will be, if practicable, informed of that decision.

4.1 Opportunity to be heard

If, as a result of our investigation, we identify an issue which indicates that an individual has engaged in misconduct, we will give the individual(s) concerned an opportunity to be heard and for us to ask further questions about the matter before any further steps are taken, including any disciplinary action.

4.2 Outcomes

When the investigation team has finalised the investigation, it will prepare a confidential report for Angle Auto's Board and/or the Audit & Risk Committee. Reasonable steps will be taken to minimise the risk that you will be identified in the report. A copy of the report will not be provided to you. If it is appropriate and reasonably practicable to do so, you will be informed that the investigation has concluded and of its findings.

5.0 Training and Board oversight

5.1 Training

Training on this Policy will be provided for all employees, including managers and Board Members, at onboarding, as well as periodic continuing professional development.

5.2 Reporting to the Board

The Board (either directly or through its Audit & Risk Committee) will monitor the whistleblower management system to ensure that the broader trends, themes and/or emerging risks highlighted by the disclosures made under this Policy are addressed and mitigated as part of its risk management and corporate governance framework.
