



Whistleblower Policy

1/04/2022

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1. Overview

1.1. Introduction

It is important for all Insignia Financial Ltd (**IFL**) people to be aware that there is a statutory Whistleblower regime¹ in Australia for the protection of Whistleblowers. The regime recognises the critical role whistleblowing can play in the early detection and prosecution of misconduct.

Under the Whistleblower regime, Eligible Whistleblowers who make a Whistleblower Report to Eligible Recipients are legally protected from reprisals.

The purpose of this Whistleblower Policy (**Policy**) is to confirm protection and guidance to Eligible Whistleblowers, improve the whistleblowing culture, increase transparency on how IFL manages disclosures of misconduct and deter wrongdoing by increasing whistleblowing awareness.

1.2. Policy statement

IFL is committed to promoting and reinforcing a culture of honest and ethical behaviour, corporate compliance and strong corporate governance in its business activities.

IFL encourages employees and other Eligible Whistleblowers to raise concerns in relation to suspected misconduct or improper state of affairs (see section 3.1) and is committed to supporting and protecting Whistleblowers who raise such concerns.

1.3. Scope and application

This Policy applies to IFL and its subsidiaries and related bodies corporate, which comprises APRA Regulated Entities (**AREs**), Responsible Entities (**REs**), Australian Financial Services Licensees (**AFSL**) (collectively referred to as 'IFL' in this Document). Where an entity specifically adopts this Policy (for example an ASIC or APRA-regulated entity) references to IOOF are taken to be a reference to that entity.

All employees, including casual, temporary, and contracted employees as well as executives and non-executive directors, any independent board committee members that are not directors and any third parties acting on behalf of the IFL Group (collectively referred to as 'our people' in this Policy) must comply with this Policy.

2. Who is an Eligible Whistleblower?

A person who reports misconduct that has occurred within IFL is a Whistleblower. However, only Eligible Whistleblowers are protected by the Whistleblower regime.

An Eligible Whistleblower includes a current or former:

- employee (permanent, part-time, fixed-term or temporary), director, intern, or associate of IFL;
- supplier of services or goods to IFL (whether paid or unpaid) including their employee such as contractor, consultant, service provider, business partner or volunteer;

¹ *Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 (Cth)*, *Corporations Act 2001 (Cth)* and *Taxation Administration Act 1953 (Cth)*.

- trustee, custodian or investment manager, or their officer, employee and supplier (and their employee) of an IFL superannuation entity; or
- spouse, relative or dependant of any of the individuals identified above.

Individuals in the following categories are not covered by the Whistleblower protections:

- people experiencing employment disputes or a personal work-related grievance;
- competitors; and
- members, investors, customers or clients.

3. What is a Whistleblower Report?

Under the Whistleblower regime, an Eligible Whistleblower who makes a Whistleblower Report about misconduct that occurs within IFL will be protected from reprisals.

A Whistleblower Report must:

- be made by an Eligible Whistleblower;
- be made to an Eligible Recipient; and
- contain information which a Whistleblower suspects on Reasonable Grounds is, or concerns, misconduct.

Reasonable Grounds to suspect is based on the objective reasonableness of the reasons for the discloser's suspicion. It ensures that a discloser's motive for making a disclosure, or their personal opinion of the person(s) involved, does not prevent them from qualifying for protection. In practice, a mere allegation with no supporting information is not likely to be considered as having 'reasonable grounds to suspect'. However, a discloser does not need to prove their allegations.

3.1 Misconduct

Misconduct is an act or behaviour that is illegal, dishonest or unacceptable, or the concealment of such conduct.

Examples of misconduct includes acts or behaviour that:

- is against the law or is a failure by IFL to comply with a legal obligation;
- is dishonest, fraudulent, negligent or corrupt (e.g. theft, drug sales/use, violence or threatened violence and criminal damage against property);
- is potentially damaging to IFL, our people or a third party, including unsafe work practices, environmental damage, health risks or substantial wasting of corporate resources;
- is misleading or deceptive conduct of any kind, including questionable accounting or financial reporting practices;
- involves bullying, harassment, victimisation or discrimination;
- is unethical, a breach of trust and/or duty, or a breach of IFL's policies, protocols or Codes of Conduct (e.g. dishonestly altering company records or data, adopting questionable accounting practices or wilfully breaching the Code of Conduct);

- constitutes a failure to identify, report, record, manage or treat a conflict of interest or a failure to follow-up or rectify an event of non-compliance, including a breach of the IFL Conflicts of Interest Policy or other relevant IFL policies;
- constitutes an offence against, or a contravention of any law administered by the Australian Prudential Regulation Authority (**APRA**) or the Australian Securities and Investments Commission (**ASIC**);
- constitutes a Commonwealth offence punishable by imprisonment of 12 months or more;
- poses a danger to the public or the financial system;
- is likely to cause financial or non-financial loss to IFL, or be otherwise detrimental to the interests of IFL; and
- is misleading with respect to the tax affairs of IFL, including tax avoidance behaviour.

Improper state of affairs may not necessarily involve unlawful conduct in relation to IFL but may indicate a systemic issue that the relevant regulator should be aware of in order for IFL to properly perform its functions. It may also relate to business behaviour and practices that may cause consumer harm or information that suggests a significant risk to public safety or stability in the financial system.

Questions in relation to the type of conduct or behaviour that may amount to misconduct that is covered by this Policy, the Corporations Act and Tax Administration Act where relevant, should be directed to the Chief Risk Officer (CRO) or Chief People Officer (CPO).

3.2 Personal Work-Related Grievances are Not Covered

Disclosures related to personal work-related grievances are not covered by the Whistleblower regime – instead they remain under the jurisdiction of the Fair Work Act 2009 (Cth).

Examples of a personal work-related grievance include:

- an interpersonal conflict between employees;
- a decision about the terms of an employment such as transfer, remuneration, or performance;
- a decision to suspend or terminate employment or otherwise discipline the employee.

Personal work-related grievances can be raised with an employee's manager, the Workplace Relations team, their Human Resources Business Partner or the CPO in accordance with IFL's Managing Performance and Conduct Policy.

However, if IFL's treatment of any personal work-related grievance breaks employment or other laws, or suggests systemic misconduct, the Whistleblower protections may apply. Seeking independent legal advice about whether such matters are covered is encouraged.

3.3 General Disclosures

Where the requirements for a Whistleblower Report are not met, a report can still be made under this Policy of any known or suspected wrongful act (a General Disclosure). IFL will not tolerate any form of victimisation against an employee who makes a General Disclosure in accordance with this Policy, provided their report is made in circumstances where the employee reasonably believes it to be true.

4. How to Make a Whistleblower Report?

A Whistleblower Report may be made in person, by telephone, online or in writing (including email). It is strongly recommended that an Eligible Whistleblower make their report in writing. Disclosures may also be made anonymously and/or confidentially, securely and outside of business hours.

A Whistleblower Report should be made to an Eligible Recipient.

A Whistleblower Report should contain as much information as possible to assist with the investigation.

A template Whistleblower Report Form is attached as Appendix 3 to this Policy.

4.1 Important Considerations Before Reporting

It is important that a Whistleblower who reports information under this Policy has reasonable grounds for suspecting that the information concerns misconduct in relation to IFL, even if the information turns out to be incorrect or unsustainable.

If a Whistleblower is an employee and deliberately makes a false report without reasonable grounds, IFL reserves the right to take appropriate disciplinary action against that Whistleblower, in accordance with the Managing Performance and Conduct Policy.

5. Eligible Recipients

5.1 Who is an Eligible Recipient?

To be protected under the Whistleblower regime, an Eligible Whistleblower report about misconduct must be made to an Eligible Recipient.

An Eligible Recipient is a person to whom an Eligible Whistleblower may disclose their concerns and includes:

- an executive officer, director or senior management (general managers or heads of) of an IFL entity;
- an internal or external auditor, or member of an audit team conducting an audit, of an IFL entity;
- an actuary of an IFL entity;
- ASIC or APRA (or another prescribed Commonwealth authority);
- a Whistleblower Protection Officer (WPO) who is authorised by IFL to receive Whistleblower Reports (see section 5.2);
- an independent lawyer;
- a journalist or parliamentarian – in limited circumstances (see section 5.3); and
- IFL's External Whistleblower Officer (see section 6).

5.1.1 Superannuation Entities

Where the relevant misconduct involves an IFL Superannuation Entity, an Eligible Recipient also includes a person authorised by the trustee of the IFL Superannuation Entity to receive a Whistleblower Report, such as the Chief Member Officer. An IFL Superannuation Entity includes the IFL Group companies that act as trustee for APRA regulated superannuation funds, an approved deposit fund or a pooled superannuation trust.

5.1.2 Tax-related misconduct

Where the relevant misconduct is tax-related, an Eligible Recipient also includes:

- an employee of an IFL entity who has functions or duties that relate to the tax affairs of an IFL entity (e.g. a senior employee of the IFL Corporate Finance team);
- a registered tax agent or BAS agent who provides services to an IFL entity;
- for any IFL entity that is a trust, the trustee of the IFL entity or a person authorised by the trustee to receive disclosures; and
- the Australian Taxation Office (ATO).

5.2 Whistleblower Protection Officer

IFL has appointed a Whistleblower Protection Officer (WPO) to safeguard the interests of Whistleblowers, so they feel free to report without fear of retaliatory action. The WPO is also responsible for protecting and safeguarding the integrity of the whistleblowing reporting process.

Whistleblowers can seek advice from the WPO prior to, or after, making a report. If the Whistleblower requests (e.g. due to anonymity), the WPO will provide the Whistleblower Report to the Whistleblower Investigations Officer (see section 7.1).

The WPO will provide reports of any Whistleblower notifications to the Chair of the Group Risk & Compliance Committee and any other relevant Risk & Compliance Committee as required.

The WPO is the IFL CPO (or a delegate - see section 10).

Chief People Officer	Mel Walls
Contact number	+61 414 516 473
Email address	melissa.walls@ioof.com.au

5.3 Eligible Recipients of Public Interest or Emergency Disclosures

An Eligible Whistleblower can make a public interest or emergency disclosure to a journalist or a parliamentarian in certain limited circumstances and qualify for protection, as set out below:

Public Interest and Emergency Disclosure Requirements
<ul style="list-style-type: none">• the information was previously disclosed to a regulator (eg. APRA or ASIC) or Commonwealth body prescribed by regulations• the previous disclosure was a Whistleblower Report

<ul style="list-style-type: none"> written notification was given to a regulator that the Whistleblower intends to make a public interest disclosure the public interest disclosure is restricted to no more information than reasonably necessary 	
Public interest disclosures Additional requirements	Emergency disclosures Additional requirements
<ul style="list-style-type: none"> 90 days have passed since the previous disclosure was made to a regulator there are reasonable grounds to believe the disclosure is in the public interest there are reasonable grounds to believe that no appropriate action is being taken (or has been taken) to address the disclosed matter 	<ul style="list-style-type: none"> there are reasonable grounds to believe the information concerns a substantial and imminent danger to health or safety to persons or the environment

Independent legal advice should be sought prior to making a public interest disclosure.

6. Reports to the External Whistleblower Officer

6.1 External Whistleblower Officer


If an Eligible Whistleblower is not comfortable using the internal IFL procedures for reporting misconduct, or has already, and is not satisfied the matter has been adequately dealt with, they may report the matter to the External Whistleblower Officer (EWO).

PricewaterhouseCoopers (PwC) is IFL's EWO responsible for handling external Whistleblower Reports made to it. The EWO is independent from IFL.

6.2 The Whistleblower Hotline

The Whistleblower Hotline is a confidential hotline managed by PwC, to which Whistleblowers can report (anonymously if they wish) cases of suspected misconduct by using the contact details below:

Whistleblower Hotline (tollfree)	1800 792 793
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Online Portal	<p>ioof.whispli.com/report</p> <p>Visit link above OR scan the QR code below</p> 
EWO Email	I00FWhistleblower@au.pwc.com
EWO Address	<p>IFL External Whistleblower Officer</p> <p>PO Box Q654, QVB Post Office</p> <p>Sydney NSW 1230</p>

The hotline will be answered by PwC Forensics staff with the experience, objectivity and professionalism to deal with all reported matters during 8am to 6pm AEST Monday to Friday, with a voicemail box outside of these hours.

When making an external disclosure, the Whistleblower will be encouraged to provide as much information as possible regarding the matter they wish to report (refer to Appendix 3 for the form to submit, or use as a guide on the information to include).

6.3 Investigations by the External Whistleblower Officer

The EWO is responsible for conducting a preliminary investigation into any Whistleblower Report it receives to determine whether the reported matter is made on reasonable grounds and sufficient for further investigation.

All matters determined by the EWO to not warrant further external investigation will be referred, as appropriate, to the WPO.

All matters determined by the EWO to warrant further investigation will be referred to the Whistleblower Investigations Officer (WIO).

The WIO will review all referred Whistleblower Reports and assess the EWO's preliminary findings to confirm whether a further investigation into the reported matter is required.

In circumstances where the WIO determines a matter does not require further investigation, the WIO will refer the matter to the WPO who will discuss the matter with the Whistleblower where the identity is not anonymous. If the Eligible Whistleblower opts to remain anonymous, the WIO will refer the matter back to the EWO.

In circumstances where the WIO determines an investigation is necessary, the WIO will liaise with the EWO and any other personnel as required.

7. Investigating a Whistleblower Report

7.1 Whistleblower Investigations Officer

The WIO is a person appointed by IFL to review and investigate Whistleblower Reports made under this Policy. The WIO has a direct reporting line to the Chief Executive Officer (CEO). A report detailing the matter, reasons for the assessment and rectification actions implemented will be prepared by the WIO. The WPO and the WIO act independently of each other and the responsibilities of these roles do not reside with one person.

The WIO is the IFL CRO (or a delegate - see section 10).

Chief Risk Officer	Anvij Saxena
Contact number	+61 405 741 574
Email address	Anvij.Saxena@insigniafinancial.com.au

7.2 Assessment of Investigations Report

Whistleblower Reports made under this Policy will be investigated by the WIO, its delegate(s) and where required, involve other personnel with the relevant expertise such as Legal, the Financial Crime team and/or Human Resources. The WIO will ensure that all personnel investigating the Whistleblower report are, as far as practicable, independent of both the Whistleblower and any person(s) who may be the subject of the allegations. Where the investigation involves the CRO, the WIO role will be delegated to someone independent of the investigation, such as the CEO or a director of the relevant board.

A reasonable timeframe will be given to investigate the Whistleblower Report. The investigations report will take into account key witness statements (where applicable) and other evidence and will recommend a course of action, including any appropriate remediation steps.

If requested, the WIO will provide the Whistleblower with status updates on agreed intervals subject to privacy/confidentiality considerations. The type of investigation required may vary based on the nature of the Whistleblower Report, however, it may be necessary to conduct interviews with witnesses or a person who is the subject of a Whistleblower Report. Where this occurs, and at all times during the investigation process, the identity of the Whistleblower will not be shared without consent, and all reasonable steps will be taken to ensure that information that might allow the Whistleblower to be identified is kept confidential.

7.3 Finalising the Whistleblower Process

The WIO will review the investigations report and consider any findings and/or recommendations before making a determination in the final report.

Any determination made finalises the internal Whistleblower process. However, the Whistleblower may still have recourse by using external processes (depending on the circumstances).

Depending on the nature of the disclosure, the final report will be provided to the:

- Chair of the Group Audit Committee (and any other relevant Audit Committee)

- Chair of the Group Risk & Compliance Committee (and any other relevant Risk & Compliance Committee)
- CEO

There may be circumstances where it may not be appropriate to provide details of the outcome to certain parties (including the Whistleblower). To the extent actions are to be undertaken, the WIO and the WPO must be kept informed of the progress.

Business issues identified during an investigation may be assigned to the relevant division executive for remediation, including to implement controls to avoid reoccurrence, while protecting any confidentiality of identity.

Any documents pertaining to a Whistleblower Report, including subsequent investigations, findings, recommendations and meeting minutes will be kept in secure storage by the WIO. Where requested and appropriate (e.g. privacy and confidentiality considerations), the Whistleblower will be provided a final status update, but will not be provided with the investigation report.

7.4 Consequences of an Investigation

The consequences for an employee found to have engaged in misconduct will depend on the circumstances. Such consequences may include appropriate disciplinary measures up to and including termination of employment, in accordance with the Managing Performance and Conduct Policy.

Any suspected criminal acts will be reported to the relevant authorities by the WIO.

If suspected misconduct relates to a regulatory breach, it will be handled in accordance with the IFL's Incident and Breach Policy and procedures.

8. How are Whistleblowers Protected?

8.1 Support to Whistleblowers

IFL is committed to providing support to Whistleblowers who make a Whistleblower Report, including:

- monitoring the behaviour of other employees relating to a reported matter;
- providing a paid leave of absence while a matter is investigated; or
- relocating employees to different working groups or departments.

Furthermore, in addition to the WPO, IFL offers the Employee Assistance Program which is a service through Benestar which provides IFL employees with personal and confidential wellbeing support.

8.2 Legislative Protections

Threats to cause detriment to the Whistleblower (whether express, implied, conditional or unconditional) are prohibited, whether or not the person threatened actually fears that the threat will be carried out.

A Whistleblower who makes a Whistleblower Report is afforded legislative protections including:

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- making it an offence to disclose information which would identify the Whistleblower or would be likely to lead to their identification without their consent (except as outlined in section 9.2);
- protection from being subject to any criminal (unless the disclosure is false), civil, or administrative liability (including disciplinary action) for making the disclosure;
- protection from enforcement or exercise of any contractual or other remedy or right on the basis of the disclosure;
- prevention of the information disclosed from being used as evidence against the Whistleblower in criminal proceedings, or in proceedings for the imposition of a penalty, other than proceedings in respect of the falsity of the information;
- giving the Whistleblower qualified privilege in respect of the information disclosed;
- prevention of the termination of a contract to which the Whistleblower is a party, on the basis that the disclosure is a breach of that contract;
- making it an offence for a person to engage in conduct that causes any detriment to the Whistleblower or another person, if that person does so because he or she believes or suspects that the Whistleblower or any other person made, may have made, proposes to make or could make a disclosure that qualifies for protection; and
- making it an offence for a person to threaten to cause detriment to the Whistleblower or another person and that person intends the Whistleblower to fear that the threat will be carried out.

A person may be detrimentally impacted if:

- they are dismissed from employment;
- their position or duties is altered to their disadvantage;
- they are discriminated against;
- they are harassed or intimidated;
- they are harmed or injured, including psychological harm;
- there is damage to their property;
- there is damage to their reputation;
- there is damage to their financial position; or
- there is any other damage.

A Whistleblower may seek compensation and other remedies through the courts if:

- they suffer loss, damage or injury because of a disclosure; and
- IFL failed to take reasonable precautions or exercise due diligence to prevent the detrimental conduct.

In such circumstances, IFL encourages the Whistleblower to seek independent legal advice.

8.3 Fair Treatment for Employees Referred to in Whistleblower Reports

IFL is committed to ensuring the fair treatment of any person who is mentioned in a Whistleblower Report made under this Policy, or to whom such report relates, by investigating all Whistleblower Reports in a fair and transparent manner in accordance with this Policy.

Any employee who is the subject of an allegation and is under investigation will be given a fair opportunity to respond to the allegation and if necessary, advised of the investigation outcome (subject to any legal, privacy and confidentiality considerations). IFL would ensure those assessing or investigating the allegations are independent of the matter itself.

9. Confidentiality

9.1 Anonymity

A Whistleblower who elects to make a report anonymously or use a pseudonym will still be protected. There is no requirement for a Whistleblower to be identified during the reporting or investigation process. A Whistleblower may also refuse to answer questions that they feel may reveal their identity. However, if their identity remains anonymous, it may limit the ability to properly investigate the matter or provide the proper support.

9.2 Identity of a Whistleblower

The identity of a Whistleblower will be protected in accordance with the applicable laws and, except as authorised, IFL will not reveal the identity of the Whistleblower, or information likely to lead to the Whistleblower's identification without their consent.

Where considered necessary, the Whistleblower may be contacted to request their consent to reveal their identity to other persons, including IFL's external legal advisers, the WIO, members of the Risk and Compliance Committee and the board of the relevant IFL entity.

Steps taken to protect a Whistleblower's identity include:

- all personal information referencing the Whistleblower (including their gender) will be redacted from any documentation;
- the Whistleblower will be consulted if there are aspects of their disclosure that could inadvertently identify them;
- disclosures will be handled and investigated by a restricted number of qualified persons, and access to information relating to a disclosure will be limited to them; and
- all documents and other materials relating to disclosures will be handled and stored securely.

IFL may be required to reveal the identity of the Whistleblower (if known) where the disclosure is made to:

- a law enforcement agency;
- a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of Whistleblower legislation;
- the Commissioner of Taxation, if the disclosure concerns tax affairs;

- ASIC or APRA, if the report does not concern tax affairs;
- a Commonwealth, State or Territory authority if the disclosure is made by ASIC, APRA, or a law enforcement agency for the purpose of assisting the authority in the performance of its functions or duties.

9.3 Co-operation and Confidentiality of Investigations

Employees are required to co-operate with any investigations (internal or external) and must treat the investigations completely confidential. Any employee revealing any details about an investigation may be subjected to disciplinary action in accordance with the Managing Performance and Conduct Policy.

10. Delegations

All investigations must be conducted by individuals with the appropriate skills and training to conduct the investigation. Investigators must be independent and unbiased in the matter and must ensure that they do not have any actual or perceived conflict of interest.

Where an investigator has an actual or perceived conflict of interest in an investigation (including where they, or a member of their team, is implicated in a report), or where an investigator is otherwise unable to act, that investigator's responsibilities under this Policy will be assigned to an appropriate delegate.

A person assigned any of the roles identified in this Policy in an acting capacity is deemed to have the same delegation as the role itself.

Any delegation must be recorded in writing.

11. Consequences of non-compliance

This Policy is given to IFL staff on commencement of employment and is made available through the intranet. The Policy is also available publicly on the IFL website.

As part of the 'IFL Fraud Awareness Program,' employees will receive the relevant training aimed at ensuring they understand how to identify and report suspected misconduct.

Non-compliance with this Policy may result in disciplinary action in line with our Code of Conduct and Consequence Management Framework. A breach of the Policy may be a breach of legislation or prudential standards. All breaches will be managed in accordance with the Incidents & Breaches Policy. Any exemptions to the Policy must be agreed by the relevant executive policy owner and Chief Risk Officer. It must be tabled at the appropriate Risk and Compliance Committees in a timely manner and may subsequently be reported to the Board(s).

12. Review and approval

This Policy will be reviewed annually by the Policy Owner, together with management and submitted to the Board Policy Review workshop at least biennially for review and approval by the relevant board(s), in accordance with Policy and Document Governance Framework, to ensure it

remains appropriate with regard to the changing nature of legislation, change in our business operations or business environment. Any material changes must be approved by the applicable board(s).

Non-material amendments to this Policy may be approved by the board(s) delegated authority in accordance with IFL's Delegations Policy.

13. Document information

13.1 File Details

Title	Whistleblower Policy
Owner	Chief Risk Officer
Approved by	Insignia Financial Ltd
Hierarchy level	Level 1 – Board Approved Policy
Effective date	11 April 2022
Last reviewed	H1 2021
Next review	H1 2024
Atlas ID	1000143

5.2 Revision History

Version	Date released	Author(s)	Description
12.0	Nov 2019	Company Secretary/Group General Counsel	Revised to comply with ASIC RG 270
13.0	Apr 2021	Jenny Truong – Senior Compliance Manager	Revised to further align with ASIC RG 270. Reflect use of whistleblower template as optional.
14.0	Apr 2022	Jenny Truong – Senior Compliance Manager	Removed reference to "without malice". Flow charts as appendix added. Included who would investigate the matter if the investigation involved the CRO (as the WIO). Updated contact number of WIO and WPO from landline to mobile.

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15.0	Dec 2022	Alyson Mitchell – Risk Governance Analyst	Updated contact name, phone number and email of CRO.
16.0	Apr 2023	Leila Lai – Compliance Manager	Updated contact name, phone number and email of CRO.

Appendix 1: Roles and responsibilities

Roles & responsibilities	
Roles	Responsibility
Board	The Boards of Insignia Financial Ltd and its subsidiaries and related bodies corporate are ultimately responsible for the protection of Eligible whistleblowers. The Boards are responsible for providing guidance to Eligible Whistleblowers, improve the whistleblowing culture, increase transparency on the management of disclosures into misconduct and deter wrongdoing by increasing whistleblowing awareness.
Chief People & Culture Officer	Appointed a Whistleblower Protection Officer to safeguard the interests of Whistleblowers as well as protect and safeguard the integrity of the whistleblowing reporting process.
Chief Risk Officer	Appointed as the Whistleblower Investigations Officer (WIO) to review and investigate Whistleblower Reports made under this Policy.

Appendix 2: Key concepts and definitions

Key concepts and definitions	
Terms	Definitions
AFSL	AFS Licence refers to an Australian Financial Services licence issued by ASIC
APRA	Australian Prudential Regulation Authority
ASIC	Australian Securities and Investments Commission
Board	Reference to IFL and its subsidiary boards including its licensed entity boards (combined or individually)
Board Committee	Reference to a committee of the IFL Board which includes the Group Risk and Compliance Committee, Group Audit Committee, Group People and Remuneration Committee and Group Nominations Committee.
CEO	Chief Executive Officer
Corporations Act	Corporations Act 2001 (cth)
Documents	Reference to our policies, charters, terms of reference, procedures, guidelines, plans, codes, frameworks, strategies, and statements (including any other supporting artefacts)
IFL	Insignia Financial Ltd (ABN 49 100 103 722) and or “Insignia Financial”
Group ‘we’/‘us’	IFL and its subsidiaries and related bodies corporate
Insignia Financial or the group	IFL, the IFL subsidiaries and related bodies corporate
Management	The management of Insignia Financial
Owner	The Owner is responsible for the Document at all stages of the policy lifecycle
People	Reference to employees of Insignia Financial, may also include contractors and other individuals working for or on behalf of the group

Appendix 3: Whistleblower Report

Please refer to the IFL Whistleblower Policy before completing a Whistleblower Report. Using this form is OPTIONAL.

All Whistleblower Reports will be treated with strict confidence.

WHISTLEBLOWER REPORT		
Date:		
Received by:		
<input type="checkbox"/>	I consent to the use of the information provided in this report in accordance with IFL policies and all relevant laws and regulations.	
<input type="checkbox"/>	I would like a summary of my concerns and proposed action to be provided to me.	
<input type="checkbox"/>	I wish to remain anonymous. (If ticked, the Whistleblower does not have to complete the last section of this Form).	
Subject Matter: (The report should, to the extent reasonably possible, address each of the items listed in the table below.)		
No	Subject	Description/Details
1	The person(s) suspected of any misconduct or involvement in misconduct including location or team involved if applicable	
2	The nature of the suspected misconduct	<input type="checkbox"/> Bullying, harassment and inappropriate behaviour
		<input type="checkbox"/> Fraud and financial issues
		<input type="checkbox"/> Theft, personal use of assets
		<input type="checkbox"/> Misuse of position or information
		<input type="checkbox"/> Other issues / I don't know
3	The date the suspected misconduct was identified	
4	How long the misconduct has been going on	
4	Any evidence of the suspected misconduct (regardless of format) and the location of any other evidence	
5	Details of any witnesses (if applicable)	
6	Any concerns of reprisals to you by making this report	

7 Any other details you consider relevant

Personal details of Whistleblower: OPTIONAL

(It is recommended that you provide your contact details as you may need to be spoken to again if clarification or further information is needed.)

Name:

Position:

Location:

Home telephone no:

Mobile:

Home Email address:

Preferred contact method:

Appendix 4: Whistleblower Process Diagram

