



Whistleblower Policy

November 2019

1. Document Control

1.1. Purpose

At iSelect, our vision is to “make Australians’ lives easier by saving them time, effort and money”.

To achieve our vision, it is crucial that our employees and partners understand, follow and adhere to our values of ‘Have Heart’, ‘Be Brave’, ‘Keep it Real’ and ‘Celebrate’.

Underpinning our value to ‘Keep it Real’ is being open and honest, and always behaving with positive intent. This value emphasises the importance we place on honesty and transparency in all our interactions with customers, partners and colleagues. ‘Keep it Real’ along with the value of ‘Be Brave’, encourages our team members to speak up when they see activity or behaviour that they are uncomfortable with, feel is wrong or not in the best interest of our customers, or does not match our values.

The goal of iSelect’s Whistleblower policy is to provide clear guidelines on how we approach and manage feedback from within our team.

This Policy outlines the approach iSelect takes to protecting Whistleblowers and the process to be taken to investigate any allegation or complaint made by Whistleblowers.

1.2. Policy Information

Policy Contact:	General Counsel	Policy Owner:	General Counsel
Approver:	General Counsel		
Approval date:	December 2019	Effective Date:	December 2019
Review period:	Annual	Next review date:	December 2020

1.3. Scope

This scope of the policy includes the following (Eligible Whistleblowers):

- Employees;
- Officers;
- Contractors;
- Associates;
- Trustees; and
- Any relative, dependent or dependent spouse of any individuals referred to above.

1.4. Record keeping requirements

iSelect will maintain appropriate records based on legislative requirements. Where there are no explicit requirements, iSelect will maintain records for five years.

1.5. Document History

Version	Date Approved	Author	Description
2019.1	December 2019	Kaelene McLennan	Review and update policy.
2018.1	13 December 2018	Katherine Harvey	Review and update to policy.
2017.1	30 November 2017	Sandra Zivcic	Review and update to policy.
2016.1	22 November 2016	Katherine Harvey	Policy reviewed and updated with comments from Head of HR and Head of Legal & Compliance.
2015.1	30 November 2015	Daniel Syrus	Policy updated.
2012.1	August 2012	People	Policy updated.
2011.1	May 2011	People	Creation of Policy.

1.6. Definitions

Term	Definition
Investigation Officer	Head of Risk & Compliance
Protection Officer	General Counsel

1.7. Related documents

- Code of Conduct
- Equal Employment Opportunity Policy

2. Our Policy

The aim of this Policy is to make employees feel comfortable about raising concerns, by offering a reporting and investigation mechanism that is objective, confidential and independent, and protects employees from reprisal or disadvantage. It is important that iSelect outlines the behaviour we want to be reported under this policy (Disclosable Matters). We want to hear from you if you witness or know about any behaviour that is:

- Fraudulent
- Illegal
- Corrupt
- Dishonest
- Unethical
- Is creating an unsafe environment
- Breaches any of our company's policies
- Discrimination
- Harassment and/or bullying of any kind
- Any conduct which is detrimental to iSelect and could cause financial or non-financial loss.

Personal work-related grievances are not governed by this policy and are not protected by the safeguards set out in this policy. Personal work-related grievance includes the following situations:

- an interpersonal conflict between the discloser and another employee;
- a decision relating to the employment, transfer or promotion of the discloser;
- a decision about the terms and conditions of the engagement of the discloser;
- a decision to suspend or terminate your employment or otherwise to discipline the discloser.

To find out more about our process for managing grievances please refer to our Grievance and Compliant Resolution Guideline.

2.1. What can I say?

If you become aware of any conduct which you consider, on reasonable grounds, may be reportable, you can raise it using one of the channels set out in section 2.2 below.

2.2. Who do I tell?

You Can Remain Anonymous

iSelect respects and protects your identity if you choose to make an anonymous report. You can remain anonymous while making a report, during an investigation as well as after the case is closed. At any given time you can identify yourself, but this is your choice and at no point do you need to or will you be forced to provide your identity.

If you decide to disclose your identity, iSelect will work to protect your identity and will outline and document who in the organisation will know you submitted a report. iSelect will also take all steps necessary (and outlined in this policy) to ensure you do not suffer retaliation.

It is worth noting that iSelect will make every endeavour possible to investigate your report, but in some cases, there are limitations of what can be achieved if you decide to remain anonymous.

iSelect has several channels for making a report if you become aware of any issue or behaviour which you consider to be Reportable Conduct either within or outside business hours: **Internal Reporting**

For the purposes of this policy and to ensure appropriate escalation and timely investigation, a report can be made to any one of the following individuals, listed below:

Whistleblowers may wish to discuss the matter informally with their direct line manager first in order to determine whether any wrongdoing has occurred. At all times, discussions will remain confidential. Where this is not appropriate, where the Whistleblower does not feel comfortable in doing so, or where the Whistleblower has previously done so and believes no action has been taken, the Whistleblower may contact the any of the following individuals directly to discuss the incident:

- General Counsel and any member of the legal team
- Head of Risk & Compliance
- Group Executive – People & Culture

You may also raise the matter with an “officer” or “senior manager” of the company. This includes a director, or a senior manager in the company who makes, or participates in making, decisions that affect the whole, or a substantial part, of the business of the company, or who has the capacity to affect significantly the company’s financial standing including internal or external auditors.

External Reporting

Alternatively, you may report an incident to iSelect’s external independent whistleblower service, **Your Call**. A report may be made using Your Call’s online form that can be accessed from Your Call’s website: <http://www.whistleblowing.com.au>. You **MUST** quote ISEL2000 in the report.

In limited situations, the incident may be of such gravity and urgency that disclosure to parliament or a professional journalist is justified. This is considered a *public interest* or *emergency* disclosure.

A public interest disclosure is permitted where:

- the disclosure has previously been made to a regulatory body*;
- at least 90 days has passed since the disclosure was made to a regulatory body and the discloser does not have reasonable grounds to believe that action is being, or has been taken, to address the matters raised in the disclosure;
- the discloser has reasonable grounds to believe that making a further disclosure would be in the public interest; and
- after 90 days the discloser has informed the regulatory body in writing that they intend to make a public interest disclosure.

An emergency disclosure is permitted where:

- the disclosure has previously been made to a regulatory body*;
- the discloser has reasonable grounds to believe that there is an imminent risk of serious harm or danger to public health or safety if the information is not acted on immediately; and
- the discloser has informed the regulatory body in writing that they intend to make an emergency disclosure.

*(for present purposes, a regulatory body is either Australian Securities and Investments Commission (ASIC), Australian Prudential Regulation Authority (APRA) or Commonwealth prescribed body)

A report may also be made to the Australian Securities and Investments Commission by using the online form accessible from: <http://asic.gov.au/about-asic/contact-us/how-to-complain/report-misconduct-to-asic/>.

2.3. What happens to me?

iSelect commits to protecting employees or eligible persons who have come forward in good faith.

No action will be taken against an employee or eligible persons where the report was made in good faith but no wrongdoing was identified.

Where illegal conduct has occurred, this may involve reporting the matter to relevant authorities and in some cases the police.

iSelect may take disciplinary action against anyone who deliberately makes a false, dishonest or vexatious report.

2.4. The Protection Officer

iSelect will appoint a Protection Officer, currently General Counsel.

The Protection Officer has the responsibility of providing individual employees with protection against disadvantage, and will contact the person to discuss their needs. The types of protections made available will depend on the situation but could include:

- ensuring confidentiality in the investigation and protecting the employee's identity;
- monitoring and managing the behaviour of other employees;
- offering a leave of absence while a matter is investigated;
- relocating employees to a different working group or department; or
- rectifying detriment an employee has suffered.

The Protection Officer is:

- trustworthy;
- able to relate to people and reassure them;
- diplomatic and tactful; and
- objective.

iSelect commits to providing direct, unfettered access to independent financial, legal and operational advisers as required for the Protection Officer to fulfil their role.

The iSelect Audit and Risk Management Committee is responsible for the appointment of the Protection Officer.

2.5. The Investigation Officer

iSelect will appoint an Investigation Officer. The Officer may be an employee of iSelect, currently Head of Risk and Compliance.

The Investigation Officer is responsible for substantiating the complaint and whether there is evidence to support or refute the allegation.

The Investigation Officer must have

- sound judgement;
- relevant investigation skills;
- integrity;
- communication skills;
- diplomacy; and
- objectivity.

The Board Audit and Risk Management Committee is responsible for the appointment of the Investigation Officer.

3. Investigation in progress

Investigation processes will vary depending on the precise nature of the conduct being investigated. All investigations will be conducted in a manner that is fair and objective to all individuals involved.

iSelect will investigate all matters reported under this policy as soon as practicable after the matter has been reported. The Investigation Officer may, with consent, undertake an investigation. Where appropriate, iSelect will provide feedback regarding the investigation's progress and/or outcome (subject to considerations of the privacy of those against whom allegations are made).

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 Protection Officer or Investigation Officer will contact the discloser 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, iSelect will conduct the investigation and its enquiries based on the information provided to it.

4. Training and Education

Training and education on this policy will be provided by iSelect to all employee's.

5. Governance

Any changes to this policy must be approved by the Board of Directors and will be communicated to all employees and any relevant stakeholders.

6. Reporting

The activities outlined in the Policy will be reported to the Audit and Risk Management Committee.

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