



Whistleblower Policy

Version: 2021.1

April 2021

1. Document Control

1.1. Purpose

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:	Head of Risk & Compliance	Policy Owner:	General Counsel
Approver:	General Counsel		
Approval date:	23 April 2021	Effective Date:	1 December 2015
Review period:	Annual	Next review date:	April 2022

1.3. Scope

Any past or present employee, employees, officers, suppliers and contractors of iSelect.

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
2021.1	April 2021	Kaelene McLennan	Review and update to policy.
2019.2		William Wright	Review and update to policy pursuant to amended legislation
2019.1	February 2019	Sandra Zivcic	Review and update to 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
Corrupt conduct	Dishonest activity in which a Director, executive, manager, employee or contractor of an entity acts contrary to the interests of the entity and abuses their position of trust in order to achieve some personal gain or advantage for themselves or another person/entity.
Improper conduct	Conduct that is corrupt, a substantial mismanagement of public resources, misconduct or an improper state of affairs or conduct involving substantial risk to public health or safety or to the environment. The conduct must be serious enough to constitute, if proved, reasonable grounds for significant dismissal.
Whistleblower	A current or former director, manager, employee, contractor, consultant or member of the public that has reasonable grounds to believe improper or corrupt conduct has occurred, is occurring or is about to occur in either the management or the conduct of iSelect. This also includes all ' <i>Eligible Whistleblowers</i> ' as set out in section 1317AAA of the Corporations Act 2001 (Cth) .
Investigation Officer	The position responsible for the investigation of Whistleblower complaints or allegations.
Protection Officer	The position responsible for the direct contact, management and discussion with the Whistleblower.

1.7. Related documents

- Code of Conduct
- Equal Employment Opportunity Policy

2. Policy

There may be times where someone may witness or find out about improper conduct by iSelect employees, officers, or contractors or consultants. People who witness such improper conduct should not feel concerned or afraid to raise their concerns as it is important to iSelect that this wrongdoing is identified and rectified.

The aim of this Policy is to make employees feel comfortable about raising concerns internally, by offering a reporting and investigation mechanism that is objective, confidential and independent, and protects employees from reprisal or disadvantage.

Examples of wrongdoing are:

- corrupt conduct;
- fraudulent or any other illegal activity;
- substantial mismanagement of iSelect resources;
- conduct involving substantial risk to public health or safety;
- conduct involving substantial risk to the environment; or
- any other conduct that could cause loss or are detrimental to iSelect and/or its employees.

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 include the following situations:

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

2.1. What can I say?

If an employee becomes aware of any conduct which the employee considers, on reasonable grounds, may be reportable, the employee should raise it using one of the channels set out in section 2.2 below.

2.2. Who do I tell?

Employees can choose to remain anonymous when submitting a complaint or allegation.

If the allegation or complaint is not made anonymously, or if the Whistleblower identity becomes apparent through the investigation, the Protection Officer will maintain contact with the Whistleblower.

Internal Reporting

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
- The Department / Business Executive / Senior manager
- Head of Risk & Compliance
- Head of Human Resources

External Reporting

Alternatively, the Whistleblower may report the incident to iSelect's external independent whistleblower service, **Your Call**. Your Call is a company that accepts anonymous tipoffs. 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>. The Whistleblower **MUST** quote ISEL2000 in the report.

In limited situations, the wrongdoing 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*;
- 90 days has passed since the disclosure was made and the Whistleblower does not have reasonable grounds to believe that action is being, or has been taken, to address the matters raised in the disclosure;
- the Whistleblower has reasonable grounds to believe that making a further disclosure would be in the public interest; and
- the Whistleblower has informed the regulatory body 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 Whistleblower 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 Whistleblower has informed the regulatory body that they intend to make an emergency disclosure.

*(for present purposes, a regulatory body is either ASIC, 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/>. Additionally, the Whistleblower may report the incident to their legal practitioner. Such a disclosure will be subject to legal professional privilege.

2.3. What happens to me?

iSelect commits to protecting Whistleblowers who have come forward on reasonable grounds.

No action will be taken against an employee where the report was made on reasonable grounds 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 the Head of Risk & Compliance.

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 as required. The Officer may be an employee of iSelect, currently General Counsel and Chief Operations Officer, or external.

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 must be conducted in a manner that is fair and objective to all individuals involved. A matter will not be investigated by someone who is implicated in the complaint or allegation.

iSelect will provide updates to individuals who raise concerns and where an investigation shows that wrongdoing has occurred, iSelect is committed to changing its processes and taking action in relation to employees who have behaved incorrectly.

4. Outcome

If the identity of the Whistleblower is known, the Protection Officer will notify the Whistleblower of any outcome of the investigation.

5. Reporting

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

6. Where to find this Policy

This policy is available at

<https://iselect.sharepoint.com/PoliciesProcedures/Whistleblower%20Policy.pdf>.

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