

# **Whistleblower Policy**

**Version 2023.1**

**October 2023**

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### 1. Purpose

iSelect Pty Ltd and its related companies (iSelect) is committed to a culture of respect and ethical conduct in the way we work and relate to each other. This Policy outlines the approach iSelect takes to protecting and supporting Whistleblowers and the process to be taken to investigate any allegation or complaint made by Whistleblowers.

Nothing in this policy is intended to change or take away any other protections which may be available at law. If there is inconsistency between this policy and the provision of relevant legislation, the provisions of the relevant legislation will apply to the extent of the inconsistency.

#### 1.1. Scope

Any past or present director, manager, employee, contractor or consultant (and spouse, relative and dependent of each such person) and any other 'Eligible Whistleblowers' set out in section 1317AAA of the Corporations Act 2001 (Cth).

### 2. Policy

There may be times where someone may witness, reasonably suspect or find out about Wrongdoing by iSelect employees, officers, or contractors or consultants. People who witness or reasonably suspect such Wrongdoing 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 Whistleblowers feel comfortable about raising concerns internally and making a Protected Report, by offering a reporting and investigation mechanism that is objective, confidential and independent, and protects Whistleblowers from reprisal or disadvantage.

#### 2.1. Examples of Wrongdoing

- 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.

- Any other conduct that could cause loss or are detrimental to iSelect and/or its employees.

### 2.2. Personal work-related grievances

We encourage everyone to speak up about concerns. However, reports that relate solely to personal work-related grievances are not generally considered to be Protected Reports as defined in this policy and are therefore not covered by this policy. Personal work-related grievances should be internally raised using the Code of Conduct policy.

Personal work-related grievances typically relate to an individual's current or former employment arrangements, performance, remuneration outcomes or personal circumstances that do not have significant implications for the organisation (for example an interpersonal conflict between you and another employee). This might generally include:

- an interpersonal conflict between a 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.
- a decision to suspend and terminate the engagement of the discloser, or otherwise to discipline the discloser.

There may be some instances where a personal work-related grievance also has significant implications for iSelect, and in these circumstances the grievance will be treated as Wrongdoing in accordance with this policy. For example, a personal work-related grievance may still qualify for protection under this policy if it is bundled with a report of illegal activity or if it includes information about Wrongdoing beyond an individual's personal circumstances, demonstrates a systemic issue within iSelect or has significant implications for the organisation. Any report of causing detriment to a person in breach of this policy is also Wrongdoing and will be addressed in accordance with this policy. Section 1.5.2 of this policy provides more information about detriment.

### 2.3. What can I say?

If a Whistleblower becomes aware of any Wrongdoing which the Whistleblower considers, on reasonable grounds, may be reportable, the Whistleblower should raise it using one of the channels set out in section 2.4 below.

### 2.4. Who do I tell?

The below sets out how concerns of a Wrongdoing can be reported. Employees can choose to remain anonymous when submitting a complaint or allegation regarding a Wrongdoing (i.e. making a disclosure), over the course of the investigation and after the investigation is finalised. If the allegation or complaint is not made anonymously, or if the Whistleblower identity becomes apparent through the investigation, the Protection Officer (as described in section 2.6) will maintain contact with the Whistleblower.

#### 2.4.1. Internal Reporting

Whistleblowers may wish to discuss the matter informally with their direct line manager first to determine whether any Wrongdoing has occurred. However, it is important to note that such a disclosure to a line manager who is not a company officer or a senior manager will not be a Protected Report and may not be entitled to the Whistleblower protections outlined under this policy.

Where reporting to a direct line manager 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 any of the following individuals directly to discuss the incident:

- Executive – Legal & Compliance
- The Department / Business Executive / Senior Manager
- Executive - People & Culture

For clarity, a Whistleblower may contact any company officer or senior manager (e.g. any member of the executive team) of iSelect at any time to make a Protected Report.

#### 2.4.2. 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 or APRA)

A report may 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/>. A report may be made to APRA by following the instructions available via [Become a 'whistleblower' or make a public interest disclosure | APRA](#).

Additionally, the Whistleblower may report the incident to their legal practitioner. Such a disclosure will be subject to legal professional privilege. It is important to understand that a report may only be made to a journalist or a parliamentarian in the circumstances described above. Whistleblowers should seek independent legal advice before making a public interest disclosure or an emergency disclosure to a member of parliament or a journalist.

### 2.5. What happens to me?

#### 2.5.1. Protection for Whistleblowers

iSelect commits to protecting Whistleblowers who have come forward with a Protected Report. No action will be taken against a Whistleblower who made a Protected Report, even if no Wrongdoing was ultimately 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.

#### 2.5.2. Protection against Detrimental Conduct

iSelect will not tolerate any detriment or threats of detriment against a Whistleblower or any other person (e.g., suspected Whistleblowers or people who participate in investigations).

It is an offence under the Corporations Act 2001 (Cth) and the Taxation Administration Act 1953 (Cth) to cause, or threaten to cause, detriment to a person because they or someone else has made, may have made, proposes to make or could make a Protected Report about a Wrongdoing and serious penalties apply for both individuals and corporations. A person who is subject to such detriment may also seek compensation or other remedies from a court if they have suffered loss, damage, or injury because of such a report or because iSelect failed to take reasonable precautions and exercise due diligence to prevent the detriment.

“Detriment” includes dismissal, suspension, demotion, or termination of a Whistleblower’s employment or engagement with iSelect; changes to their employment, position, or duties to the Whistleblower’s disadvantage; discrimination; harassment or intimidation; harm or injury (including psychological harm); damage to property, reputation, business, or financial position; or any other damage. However, the following actions are not considered to be detriment:

- reasonable administrative action taken to protect a Whistleblower from detriment (e.g., relocating them to another office to prevent victimisation);
- managing unsatisfactory work performance of a Whistleblower, in line with iSelect’s usual performance management framework.

iSelect will protect Whistleblowers from detriment arising from making a Protected Report by:

- conducting a risk assessment of the disclosure to manage the risk of detriment to the Whistleblower;

- where applicable, making such reasonable adjustments as required to allow the Whistleblower to perform their duties at work without being potentially exposed to detriment (eg by changing reporting lines or location).

If you believe you have suffered detriment, you can make a complaint to an officer or senior manager (e.g., any member of the executive team) of iSelect or by contacting Your Call. You can also lodge a complaint with ASIC, APRA or the ATO.

### 2.5.3. Protection for Whistleblowers against Litigation

If you make a Protected Report in accordance with this policy you are protected from any of the following legal actions for doing so:

- Civil liability (e.g., any legal action against you for breaching an employment contract, a duty of confidentiality or another contractual obligation);
- Criminal liability (e.g., legal action against you for unlawfully releasing information, or other use of the report against you in a criminal proceeding (other than for making a false disclosure));
- Administrative liability (e.g., disciplinary action for making the report).

Whistleblowers are still responsible for their own actions. These protections do not prevent action being taken against a Whistleblower for any Wrongdoing that they are involved in that is revealed in a Protected Report.

### 2.5.4. Confidentiality

If the Whistleblower does not consent to their identity being shared, then iSelect will take reasonable steps to keep that identity confidential. iSelect will comply with its legal requirements regarding protecting confidentiality of a Whistleblower's identity, noting that the only permitted disclosure of a Whistleblower's identity without their consent is to ASIC, APRA, AFP (not local police) or a legal practitioner for legal advice.

However, a person who is dealing with a Protected Report may disclose information that is reasonably necessary for the purposes of investigating the report. If this happens, reasonable steps will be taken to reduce the risk that a Whistleblower will be identified as a result of the report (for example by removing the Whistleblower's personal information or other details that are likely to identify them). For example, to maintain confidentiality of a Whistleblower's identity, iSelect:

- will ensure personal information or references to the Whistleblower's identity are redacted in all investigation and reporting documents;
- may refer to the Whistleblower in gender-neutral terms;
- will ensure that the information a Whistleblower provide and all materials relevant to a report regarding a Wrongdoing made in accordance with this policy are held securely with access limited only to the individuals necessary to investigate the report, and to support and protect the Whistleblower; and
- will take reasonable steps to ensure its personnel understand the requirements of this policy.

Whistleblowers should also be aware that during an investigation, it may be necessary for iSelect to tell the people who are believed to be involved in the Wrongdoing about the alleged Wrongdoing. This is to ensure a fair investigation and provide those people with an opportunity to respond to the allegations. Although a Whistleblower's identity will not be told to these people, unless a Whistleblower gives consent, it is possible that the details of the report may lead them to believe that they know the identity of the Whistleblower.

Any breach of confidentiality will be treated as a serious matter and may be the subject of disciplinary action up to and including dismissal or termination of engagement with iSelect. Breaches of Whistleblower confidentiality is also an offence under the Corporations Act 2001 (Cth) and the Taxation Administration Act 1953 (Cth) and serious penalties apply for both individuals and corporations.

If you believe your confidentiality as a Whistleblower has been breached, you can make a complaint to an officer or senior manager (e.g. any member of the executive team) of iSelect or by contacting Your Call. You can also lodge a complaint with ASIC, APRA or the ATO.

### 2.6. The Whistleblower Protection Officer

The iSelect Board is responsible for the appointment of a Whistleblower Protection Officer (WPO). The currently nominated WPO is the Executive – People & Culture, however, if the Executive – People & Culture is not deemed to be an appropriate person based on the type of reported Wrongdoing or a potential conflict of interest, the Executive – Legal & Compliance or Chief Executive Officer will assume the responsibilities of the WPO. The Whistleblower's identity will only be disclosed to a WPO if the Whistleblower provides consent.

The WPO has the responsibility of providing individual Whistleblowers with protection against disadvantage and will contact the Whistleblower to discuss their needs. The types of protections made available will depend on the situation but could include:

- assess the immediate welfare and protection needs of a Whistleblower and assess the immediate welfare and protection needs of a Whistleblower;
- address any issues or concerns of detriment;
- ensuring confidentiality in the investigation and protecting the Whistleblower's identity (noting that this is an obligation under law and is not dependent on the situation);
- monitoring and managing the behaviour of other employees;
- offering a leave of absence while a matter is investigated;
- relocating a Whistleblower to a different working group or department; or
- rectifying detriment a Whistleblower has suffered.

The WPO 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 WPO to fulfil their role.

### 2.7. The Investigation Officer

After receiving a report about Wrongdoing the information provided will be assessed to determine whether the report is protected under this policy, how it will be handled and whether an investigation is required. The precise steps to be taken to investigate a report will differ in individual cases but may include:

- appointment of an Investigation Officer (if it has been determined that an investigation is required);
- the investigator or other person asking the Whistleblower whether they consent to their identity being disclosed to investigate the report;

- interviewing the Whistleblower and any other relevant person to obtain information about the report;
- review of relevant documents and other information in relation to the report;
- the investigator making findings regarding the conduct reported.

The Investigation Officer will conduct the investigation under direction of the Executive – People & Culture and if appropriate the Chief Executive Officer. The Investigation Officer may be an employee of iSelect, with the currently nominated Investigation Officers being Executive – Legal & Compliance, People & Culture Representative, or external investigator.

The Investigation Officer will be responsible for substantiating the complaint and whether there is evidence to support or refute the allegation and must have:

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

### 3. Investigation in Progress

#### 3.1. Investigation Process

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. Generally, if the Whistleblower can be contacted, iSelect will confirm receipt of their report of a Wrongdoing within 2 business days. The investigation of such a report will commence as soon as reasonably possible from the date it is received. However, there may be reasons why an investigation may take longer. If there might be a delay with the investigation, the person who made the report will be notified (where possible).

Where possible and assuming that the identity of the Whistleblower is known, the Whistleblower will be kept informed of when the investigation process has begun, while the investigation is in progress and after the investigation has been finalised, subject to confidentiality and privacy considerations. iSelect will take all reasonable steps to ensure that any employee who is the subject of a Whistleblower report is afforded fair treatment and an impartial investigation in accordance with this policy. Generally, when an investigation is conducted, employees who are the subject of Whistleblower report may be, within the constraints of confidentiality:

- told about the substance of the allegations;
- given a fair and reasonable opportunity to respond to the allegations before the investigation is finalised; and
- informed about the findings of the investigation and given an opportunity to respond to those conclusions before any action is taken against them (subject to legal, privacy and confidentiality requirements).

iSelect may also decide to act in response to any findings which may include, but is not limited to, disciplinary action, reporting the matter to an appropriate regulator, conducting training or addressing procedural and policy deficiencies.

#### 4. Outcome

If the identity of the Whistleblower is known, the Protection Officer will notify the Whistleblower of any outcome of the investigation. Alternatively, if they remain anonymous, the Whistleblower may maintain ongoing two-way communication via iSelect's external independent whistleblower service, Your Call.

#### 5. Reporting

The activities outlined in this policy will be reported to the Audit and Risk Management Committee. Specifically, the Audit and Risk Management Committee may be provided with details of the Whistleblower report and any findings made to ensure appropriate oversight of reports and investigation of matters reported under this policy.

If the Whistleblower does not provide consent for their identity to be disclosed, those persons within iSelect who are handling the report may disclose information to the Audit and Risk Management Committee that is reasonably necessary for the purposes of investigating the report, provided that all reasonable steps are taken to reduce the risk that the Whistleblower will be identified as a result of the report.

The Audit and Risk Management 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 iSelect's risk management and corporate governance.

## 6. Where to find this Policy

This policy is available on MyHub > Policies and Procedures > People & Culture - Policies. The policy is also available via [iSelect - Governance](#) for public access, including to former employees and other eligible Whistleblowers outside of iSelect.

This policy may be reviewed and amended from time to time. The People and Culture team will be responsible for conducting upfront and ongoing education and training on this policy.

If you require further information in relation to this policy, or how to make a report under this policy, you can contact the Executive – People & Culture.

## 7. Related Documents

- Code of Conduct
- Respectful Workplace Behaviour

## 8. 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 circumstances or conduct involving substantial risk to public health or safety or to the environment.
Whistleblower	A current or former director, manager, employee (including volunteers and work experience students), contractor, supplier or consultant (and spouse, relative or dependent of each such person) 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 'Eligible Whistleblowers' 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.

Term	Definition
Whistleblower Protection Officer	The position responsible to assess the immediate welfare and protection needs of the Whistleblower and protection and support of the Whistleblower's interests. This position will be responsible for the direct contact, management and discussion with the Whistleblower.
Protected Report	<p>To be eligible for the legal protections outlined in this policy, a person must:</p> <ul style="list-style-type: none"> <li>(a) be an eligible Whistleblower;</li> <li>(b) report their concerns to an eligible recipient or certain other persons, as set out in this policy; and</li> <li>(c) have reasonable grounds to suspect Wrongdoing in relation to iSelect. A person will have 'reasonable grounds' to suspect that something constitutes or potentially constitutes Wrongdoing if they have some factual basis for their suspicion which, in light of the circumstances and context, provides reasonable grounds for that suspicion. Motive is not relevant to determining whether the disclosure is eligible for protection.</li> </ul> <p>If a report meets all three of these criteria, it is a Protected Report.</p>

Term	Definition
Wrongdoing	<p>Corrupt conduct and/or Improper conduct. Generally, Wrongdoing will include any conduct which an eligible Whistleblower has reasonable grounds to suspect:</p> <ul style="list-style-type: none"> <li>(d) Is about misconduct or an improper state of affairs or circumstances concerning iSelect;</li> <li>(e) indicates that iSelect or any of its officers or employees has engaged in conduct that: <ul style="list-style-type: none"> <li>(i) involves a breach of or is an offence against any of the following Commonwealth laws: the Corporations Act 2001 (Cth), the Australian Securities and Investments Commission Act 2001 (Cth), 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 1973, or the Superannuation Industry (Supervision) Act 1993, or regulations made under those laws;</li> <li>(ii) is an offence against any other Commonwealth law that is punishable by imprisonment of 12 months or more;</li> <li>(iii) indicates a significant risk to public safety or the stability of, or confidence in, the financial system, even if it does not involve breach of a particular law; or</li> <li>(iv) is indicative of systemic issues, dishonest or unethical behaviour or practices;</li> </ul> </li> <li>(f) is about misconduct or an improper state of affairs or circumstances in relation to the tax affairs of iSelect or an associated company which the Whistleblower considers may assist to perform the functions or duties in relation to the tax affairs of iSelect; or</li> <li>(g) involves the deliberate concealment of information tending to show any of the matters listed above.</li> </ul>

## 9. Document Control

Policy Department	People & Culture	Next Review Date	October 2024
Policy Owner	Executive – People and Culture	Review Period	Annual
Approver	ISU Board of Directors	Last Author	Sonya Oakley

## 10. Document History

Version	Date Approved	Author	Description
2023.1	October 2023	Sonya Oakley	Policy update to reflect new ownership structure and update to WPO.
2022.0	August 2022	Amela Murica	Policy update
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.