

GROUP WHISTLEBLOWER POLICY ("Policy")

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Board approval required for: <i>Material Changes to Policy</i>	General Counsel approval required for: <i>Non-Material Changes to Policy</i>	General Counsel approval required for: <i>Non-Material Changes to Procedure</i>

Policy/Framework Context:	
Legislative/Prudential framework	<ul style="list-style-type: none"> ▪ Section 1317AI(5) under Part 9.4AAA of the <i>Corporations Act</i> ▪ Paragraphs 48 to 53 inclusive of <i>Prudential Standard CPS 520 Fit and Proper</i>
Related policies	<ul style="list-style-type: none"> ▪ Hollard Group Fit and Proper Policy ▪ Hollard Board Audit Committee Charter ▪ Hollard Compliance Framework ▪ Hollard Bullying and Equal Employment Opportunity (EEO) Policy ▪ Hollard Confidentiality and Non-Disclosure Policy ▪ Hollard Employee Assistance Policy ▪ Hollard Grievance Policy ▪ Hollard Work Health and Safety Policy

Table of Contents

1.0	ABOUT THE DOCUMENT	3
2.0	ROLES AND RESPONSIBILITIES	5
3.0	DEFINITIONS, KEY TERMS AND OVERVIEW	6
4.1	WHAT IS REPORTABLE CONDUCT?	8
4.2	WHO CAN REPORT AS A WHISTLEBLOWER?	9
4.3	WHO CAN I MAKE A REPORT TO?	9
4.4	HOW REPORTS ARE INVESTIGATED?	11
4.5	DUTIES OF HOLLARD EMPLOYEES	12
4.6	CONFIDENTIALITY & ANONYMITY	12
4.7	PROTECTIONS FOR INDIVIDUALS	13
4.8	LOSS OF PROTECTION	15
5.0	MONITORING AND REPORTING	15
6.0	EMBEDMENT AND CHANGE MANAGEMENT CONSIDERATIONS	15

1.0 ABOUT THE DOCUMENT

This Group Whistleblower Policy (“Policy”) is approved by the Boards of Hollard Holdings Australia Pty Ltd (HHA), The Hollard Insurance Company Pty Ltd (HIC) and Hollard Insurance Partners Ltd (HIP), collectively “Hollard”.

HHA is the designated “parent entity” of the APRA regulated Level 2 insurance group (“the Group”). This Policy forms part of the Group’s compliance framework with respect to the relevant sections of the Corporations Act and the relevant APRA prudential standard.

As such, this Policy applies to subsidiaries within the Group including Hollard Commercial Insurance Pty Ltd and to Hollard New Zealand (HIC’s operating branch located in New Zealand).

PURPOSE

The Corporations Act 2001 (Cth) and the Tax Administration Act 1953 (Cth) provide for protections for whistleblowers (“Whistleblower Protection Scheme”). Hollard’s Whistleblower Policy empowers you to play an active part in ensuring we live up to our aspirations and eliminate any improper conduct, behaviour or decisions in the workplace.

Hollard Employees and all categories of eligible whistleblowers are encouraged to raise concerns they may have regarding conduct occurring at Hollard and its subsidiaries including via Hollard’s external reporting organisation, [STOPline](#).

Hollard is committed to a supportive workplace in which concerns can be openly discussed and, in many cases, it will be appropriate for these to be raised informally, for instance with your People Leader. In the case of a Reportable Matter, it is important to understand that you may do so confidentially and anonymously and subject to the protections set out in this Policy and the Whistleblower Protection Scheme, as set out below.

The purpose of this Policy is to explain Hollard’s whistleblowing process including how and where to make a whistleblower disclosure, to encourage you to raise any concerns you have and to outline how Hollard will manage those disclosures so as to:

- allow you to disclose concerns safely, securely and with confidence that they will be protected and supported;
- deal with disclosures appropriately and on a timely basis;
- provide transparency around Hollard’s framework for receiving, handling and investigating disclosures;
- help deter improper conduct, behaviour and decisions;
- provide a practical tool for helping Hollard to identify wrongdoing that may not otherwise be uncovered; and
- implement a framework for whistleblower disclosures which meets the requirements of the *Whistleblower Protection Scheme*.

Any questions you have about how this Policy operates should be directed to the contact point for Hollard’s external reporting organisation [STOPline](#)

BOARD OVERSIGHT

Governance of this Policy is overseen by Hollard's Board Audit Committee on behalf of the Boards. The focus of this Board oversight is to ensure that anyone who reports any instances of suspected unethical, illegal or fraudulent conduct, or an improper state of affairs, involving Hollard or any of its subsidiaries has confidence that they can make a report without fear of intimidation, disadvantage, reprisal or other detriment.

AVAILABILITY

This Policy will be made available to Hollard employees through the Hollard intranet and staff training. It will be provided separately to Eligible Recipients who are not Hollard employees (see section 5.0). A version of the Policy will also be made available to others entitled to make disclosures under this Policy through Hollard's external website

QUESTIONS

Hollard recognised that some disclosers may wish to seek additional information about the subject of this Policy before formally making a disclosure. Any questions you have about how this Policy operates can be directed to the contact point for Hollard's external reporting organisation STOPline (see Section 4.3 of this Policy for details) or an independent legal adviser.

2.0 ROLES AND RESPONSIBILITIES

ROLE	RESPONSIBILITIES
Hollard Boards	<ul style="list-style-type: none"> • Approve the Policy
Subsidiary Boards	<ul style="list-style-type: none"> • Adopt the Policy (or equivalent, as applicable) in accordance with the Group Governance Principles of the Board Charter and Group Delegated Authorities Policy
Board Audit Committee	<ul style="list-style-type: none"> • Recommend the Policy to the Board for approval; • Monitor compliance with the Policy and report risks and issues (including as to trends, themes or emerging risks that may be highlighted by disclosures) to the Board as applicable • Chair of BAC is empowered to notify Group CEO of incidents at any time following receipt of notice of such incidents to BAC.
Hollard Executive Team Policy Sponsor	<ul style="list-style-type: none"> • Recommend the Policy to the Board Audit Committee for approval in consultation with the General Counsel • Undertake any steps required to be taken by the HLT's Policy Sponsor within the Policy
Policy Owner: Disclosure Officer / General Counsel	<ul style="list-style-type: none"> • Author and update the policy • Oversee communication of the Policy and updates to key stakeholders. • Receives and assesses reports from Whistleblowing channels • Provides quarterly reporting on whistleblowing to relevant Committees and Boards • Accountable for notifying the Chairs of the relevant board audit committee(s) of disclosures to be investigated by a Whistleblowing Investigation Officer
Group CEO (across each of the HHA, HIC and HIP entities)	<ul style="list-style-type: none"> • Undertake any steps required to be taken by them within the Policy. • Ensure that any whistleblower disclosures made to them as Eligible Recipient are immediately notified to the Disclosure Officer for investigation and treatment in accordance with the Policy.
Disclosure Officer	<ul style="list-style-type: none"> • Undertake any steps required to be taken by this person within the Policy. • Prepare and submit reports to the Board Audit Committee as to any matters raised or dealt with under this Policy.
Head of Governance	<ul style="list-style-type: none"> • Facilitate Management Reporting to Board Audit Committee and Board.
Internal Audit	<ul style="list-style-type: none"> • Periodic monitoring of compliance with the Policy and report risks and issues.
Hollard Functional Area (HFA) Head	<ul style="list-style-type: none"> • Undertake any steps required to be taken by those persons within the Policy including ensuring that any whistleblower disclosures made to them as Eligible Recipient are immediately notified to the Disclosure Officer for investigation and treatment in accordance with the Policy.

3.0 DEFINITIONS, KEY TERMS AND OVERVIEW

DEFINED / KEY TERM	DEFINITION / EXAMPLES
Hollard	means Hollard Holdings Australia Pty Ltd and The Hollard Insurance Company Pty Ltd.
Disclosure Officer	means the General Counsel of The Hollard Insurance Company Pty Ltd. The person in this role is responsible for managing disclosures within Hollard. This person is also the contact point for the external reporting organisation <i>STOPline</i> . In the absence of the General Counsel, Hollard’s Chief People & Legal Officer will either act as, or nominate, an alternate Disclosure Officer.
Hollard Employees	means employees, officers, volunteers, contractors, consultants, agents, and directors of Hollard and its subsidiaries
Reportable Conduct	has the meaning provided in section 4.1 of this Policy
Whistleblower Support Officer (WSO)	means the person/s who is appointed to take all reasonable steps to support the Whistleblower through the process of reporting an allegation of wrongdoing and during any subsequent investigation by Hollard. This support may include; <ul style="list-style-type: none"> • keeping in regular contact with the Whistleblower; • considering any complaint of retaliation made by the Whistleblower as a result of notifying the Reportable Conduct; • responding to any other concerns raised by the Whistleblower in connection with their notification and reporting.
Whistleblower Investigation Officer (WIO)	means the person/s appointed by the Disclosure Officer to conduct an investigation of the disclosure of Reportable Conduct. This may include the use of internal or external investigative resources, however in all cases must be operationally independent of the area under investigation
Whistleblower Protection Scheme	The protections for whistleblowers provided by the Corporations Act 2001 (Cth) and the Tax Administration Act 1953 (Cth).

WHISTLEBLOWING OVERVIEW - KEY CONSIDERATIONS

What information can be reported?

- Whistleblower protections are directed towards Reportable Conduct - that is information that gives rise to 'reasonable grounds to suspect' misconduct or an improper state of affairs concerning a member of the Hollard Group?
- see [section 4.1](#) of the Whistleblower Policy for more details of the types of reportable matters that qualify for protection.

Who can report?

- Do you fall into the category of 'eligible person' who can report as a Whistleblower?
- see [section 4.2](#) of the Whistleblower Policy for more details of who constitutes an 'eligible person'. Note: you do not need to disclose your identify - you are entitled to report anonymously.

How to report?

- Make your information report to an 'Eligible Recipient' by utilising the Internal, External or Public reporting channels for Eligible Whistleblowers adopted by the Hollard Group
- see [section 4.3](#) of the Whistleblower Policy for more details on the information reporting channels available to you.

Evaluation & Investigation

- An evaluation will be undertaken into your report, and a decision will be taken as to whether to investigate the matter. Where the Whistleblower protections apply any investigation will be conducted with due regard to those Whistleblower protections.
- see [section 4.4](#) of the Whistleblower Policy for more details on how reports are investigated.

Protections

- Whistleblowers are entitled to the following protections:
 - identity protection (confidentiality);
 - protection from detrimental acts or omissions; and
 - civil, criminal and administrative liability protections and remedies
- These protections apply not only to internal disclosures, but to disclosures to legal practitioners, regulatory and other external bodies, and public interest and emergency disclosures that are made in accordance with the Corporations Act and whether or not disclosed anonymously.
- see [section 4.7](#) of the Whistleblower Policy for more details on applicable protections.

4.0 POLICY DETAILS

4.1 WHAT IS REPORTABLE CONDUCT?

You can make a report, with the benefit of the protections set out in this Policy and under the Whistleblower Protection Scheme, if you have reasonable grounds to suspect that the information concerns misconduct, or an improper state of affairs or circumstances, including whereby Hollard or a subsidiary or any of their employees have engaged in conduct which is:

- dishonest or improper;
- fraudulent or corrupt;
- illegal, such as theft, drug sale or use;
- violent;
- bullying, discrimination, victimisation or harassment;
- criminal, such as damage to property or other breaches of state or federal legislation;
- a failure to comply with, or a breach of, legal or regulatory requirements, including but not limited to the *Corporations Act* and *ASIC Act*;
- misconduct, or an improper state of affairs or circumstances in relation to Hollard's tax affairs;
- in the case of Hollard Holdings Australia Pty Ltd, The Hollard Insurance Company Pty Ltd and/or Hollard Insurance Partners Ltd, indicates that a responsible person does not meet the fit and proper criteria set out in the Hollard Group Fit and Proper Policy;
- may be a systemic issue that a regulator should know about to properly perform its function;
- potentially harmful to Hollard Employees, such as unsafe work practices or environment; or
- represents a danger to the public or the financial system.

As well as the *Corporations Act* protections, further protection is afforded to Whistleblowers under the *Taxation Administration Act 1953*.

Further information about these laws can be found at:

<https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/>
<https://www.ato.gov.au/general/gen/whistleblowers/>.

If you are unsure whether the matter would be considered a Reportable Matter Hollard nonetheless encourages you to report through one of the channels set out in section 4.3 so that the protections will nonetheless operate, if applicable.

HR Grievances

The protections in this Policy and under the Whistleblower Protection Scheme do not apply to certain personal work-related grievances, including but not limited to interpersonal conflicts, terms of employment, transfers, promotions, performance and discipline (including suspension and termination). For grievances fitting this definition, please refer to the Hollard Grievance Policy.

However, there are instances when a personal work-related grievance may still qualify for protection in certain circumstances – for example:

- if the report is a mixed report (containing information about misconduct accompanied

by a personal work-related grievance); or

- re Hollard has breached employment or other laws punishable by imprisonment for a period of 12 months or more, or engaged in conduct that represents a danger to the public, or
- where the information disclosure suggests misconduct beyond your personal circumstances;
- where you suffer from or are threatened with detriment for making a disclosure; or
- where you seek legal advice or legal representation about the operation of the Whistleblower Protection Scheme.

Other matters

The protections in this Policy and under the Whistleblower Protection Scheme also do not apply to disclosures relating to other topics, where the information does not concern misconduct or an improper state of affairs or circumstances.

4.2 WHO CAN REPORT AS A WHISTLEBLOWER?

You can make a report if you are or have been, any of the following:

- a director or officer of Hollard or its subsidiaries;
- an employee of Hollard or its subsidiaries;
- a supplier of services or goods to Hollard or its subsidiaries (whether paid or unpaid);
- an employee of a supplier of services or goods to Hollard or its subsidiaries (whether paid or unpaid);
- an associate of Hollard or its subsidiaries;
- a relative of any of the above individuals; or
- a spouse or dependent of any of the above individuals.

4.3 WHO CAN I MAKE A REPORT TO?

Hollard has several ways for making a report.

STOPline

We have engaged an external specialist organisation (STOPline) to confidentially receive any concerns raised under this Policy. This is so that people raising concerns can feel comfortable and assured that the issues will be dealt with confidentially, professionally and in good faith, and can be reported via telephone, mail, email, fax or this website. It is also important to remember our program enables individuals to maintain anonymity should they so desire. STOPline is available to all Hollard Employees and designated stakeholders referred to in section 4.0 above.

Translation services can be provided if requested. Disclosures can be made to STOPline under this Policy in any of the following ways:

Phone: **1300 30 45 50** – AUSTRALIA

+61 3 9811 3275 – OVERSEAS (REVERSE CHARGES)

Email: SEND AN EMAIL TO: hollard@stoline.com.au

Post: C/O STOPLINE, P.O. Box 403, Diamond Creek, Victoria, 3089.

App: Search for STOPline in the iTunes App Store or Google Play to download the free app and submit a disclosure

Disclosure to others

While Hollard encourages you to use STOPline for disclosures under this Policy, you are also entitled to make a disclosure to:

- another "**Eligible Recipient**" in relation to Hollard, which means:
 - a director or other officer (such as a company secretary);
 - a senior manager;
 - an internal or external auditor, or a member of an audit team conducting an audit; or
 - an actuary of Hollard;
 - any other person not otherwise listed above who is authorised by the company to receive Whistleblower disclosures (such as General Counsel)
- ASIC;
- APRA; or
- Your lawyer.

When you communicate Reportable Conduct directly to STOPline or one of above recipients you qualify for protection as a whistleblower under the *Corporations Act* from the time you make your disclosure. Where, instead of using the STOPline, you make a disclosure to one of the other Hollard Eligible Recipients above, it is important that you first state that you want to make a disclosure under this Policy, so that the recipient understands that the terms of the Whistleblower Policy need to be met. The Hollard Eligible Recipients may be contacted in person, by telephone, email or mail.

Where an Eligible Recipient receives a disclosure, they should immediately notify the Disclosure Officer and follow their directions.

Public Interest Disclosures

Where you have made an eligible disclosure to ASIC or APRA (but not otherwise), you are also entitled to disclose information to a journalist or parliamentarian in the following circumstances:

- at least 90 days have passed since you made the disclosure to ASIC or APRA;
- you do not have reasonable grounds to believe that action is being, or has been taken, in relation to the disclosure;
- you have reasonable grounds to believe that making a further disclosure of the information is in the public interest; and
- before making the public interest disclosure, you have given written notice to ASIC or APRA (as appropriate) that identifies the disclosure and states that you intend to make a public interest disclosure.

Emergency Disclosures

Where you have made an eligible disclosure to ASIC or APRA (but not otherwise), you are also entitled to disclose information to a journalist or parliamentarian in the following circumstances:

- you have reasonable grounds to believe that information subject to the disclosure concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment;
- before making the emergency disclosure, you have given written notice to ASIC or APRA (as appropriate) that identifies the disclosure and states that you intend to make an emergency disclosure; and
- the extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the journalist or parliamentarian of the substantial and imminent danger.

Legal Advice

The protections in this Policy also apply to any disclosure made by you, as an eligible Whistleblower, to a legal practitioner for the purpose of obtaining legal advice or legal representation regarding the operation of the whistleblower provisions in the *Corporations Act* and this Policy (even if the legal practitioner concludes that a disclosure is not Reportable Conduct).

4.4 HOW REPORTS ARE INVESTIGATED?

Any report made to our external provider, STOPline, will be detailed in a Disclosure Report to Hollard's Disclosure Officer, unless information in the report relates to the Disclosure Officer, in which case STOPline will instead provide its report to the Group CEO, without the involvement of any other parties. Similarly, if the Disclosure Officer considers they may have an actual or potential conflict in relation to a disclosed matter, they should immediately pass all information relating to the disclosure to the Group CEO, as applicable, and remove themselves from further involvement.

Assessment

After this initial report, Hollard's Disclosure Officer (or the Group CEO, as applicable) will assess the disclosed matter to determine whether it qualifies for protection under this Policy and whether an investigation is warranted.

Where that is the case, Hollard's Disclosure Officer will plan the nature, scope and timeframe for the investigation, which will vary depending on the nature of the disclosure and appoint a Whistleblower Investigation Officer with appropriate expertise and skills and operationally independent from the area under investigation.

Investigation

Hollard's Disclosure Officer will provide information the subject of the disclosure to the Whistleblower Investigation Officer where that is reasonably necessary for investigating the issues raised in the disclosure. That will only include your identity where you have provided your consent for that to be given.

The Whistleblower Investigation Officer will be responsible for ensuring that the investigation is objective, fair and independent, and if considered appropriate in consultation with the Disclosure Officer, ensure that it is independently investigated by STOPline or an additional independent third party.

Communications with Whistleblower

During this process, STOPline and/or the Whistleblower Investigation Officer (as appropriate) will provide regular updates to the discloser (where known) and the Disclosure Officer to keep them informed of the investigation's progress and, except where there are

circumstances when it might not be appropriate to furnish details of the outcome to the discloser, will advise them of their ultimate decision. The content, frequency and timeframe of updates will depend on the nature of the disclosure.

The discloser is entitled to remain anonymous or use a pseudonym during the course of the investigation and is entitled to refuse to answer any questions put to them, though this may impact the effectiveness of the investigation. We encourage anonymous disclosers to maintain ongoing communication using their preferred reporting channel, as this will better allow us the opportunity to ask follow-up questions and better understand and investigate the discloser's concerns.

The ultimate decision will also be communicated to the Group CEO, without providing identifying details of the person reporting the concerns. In addition, review findings will be provided to the Board Audit Committee as part of its monitoring and oversight function and risks and issues that may be highlighted by disclosures and review findings will be reported to the Board, as applicable.

If you are not satisfied with the outcome

Where the person raising concerns is not satisfied with the conduct or outcome of the investigation, or the ultimate decision, they can request that either STOPline or Hollard's Disclosure Officer escalates the matter to the Group CEO, for further consideration.

4.5 DUTIES OF HOLLARD EMPLOYEES

It is expected that Hollard Employees who become aware of known, suspected, or potential cases of Reportable Conduct will make a report under this Policy or under other applicable policies.

4.6 CONFIDENTIALITY & ANONYMITY

We recognise the decision to report a concern can be a difficult one to make. Having regard to that, STOPline and Hollard's Disclosure Officer will keep all information provided to them as part of a disclosure, including regarding your identity, in secure physical or network locations and will allow access to that information only in accordance with the terms of this Policy.

Where information is provided to a Whistleblower Investigation Officer or other individual, they will maintain confidentiality over the information in accordance with this Policy and any directions from the Disclosure Officer. In passing on any information, care will be taken to minimise the risk of the discloser being identified, for instance by using gender neutral language and removing aspects of the information which could point towards the discloser's role at Hollard.

Reports may be made anonymously or using a pseudonym and still qualify for protection under this Policy and the Whistleblower Protection Scheme (though this may impact the effectiveness of any whistleblowing investigation into the disclosure – see 'Communications with Whistleblower' above).

Where you do provide your identity, that, and information likely to lead to your identification will only be disclosed to individuals other than Hollard's Disclosure Officer, including the Whistleblower Investigation Officer, in the following circumstances:

- with your consent;
- to ASIC, APRA or the Australian Federal Police; or

- to a legal practitioner for the purpose of obtaining legal advice or representation about the whistleblower provisions in the *Corporations Act*.

It is illegal for a person to disclose your identity or information likely to lead to your identification other than in these circumstances.

To ensure appropriate oversight at the Hollard Board, the Disclosure Officer will prepare, submit and, if requested, speak to any matters raised or dealt with under this Policy to the Board Audit Committee. At all times the protection of confidentiality, and where requested anonymity, will be paramount. The Chair of the Board Audit Committee may notify the Group CEO of any new notifications reported to the Board Audit Committee at any time following receipt of such notifications to the Board Audit Committee except where to do so may reasonably compromise the independence of the investigation with respect to the relevant incident.

The Hollard Disclosure Officer will maintain appropriate records regarding each step in the process for dealing with whistleblower disclosures as set out in this Policy, including reports, communications, other documents prepared in relation to the disclosure and the ultimate decision.

If you believe there has been a breach of your confidentiality, as set out in this section 4.6, you may lodge a complaint with Hollard's Disclosure Officer or, if they may be involved in the breach, to the Group CEO. In that case, you would also be free to seek independent legal advice or lodge a complaint with ASIC, APRA or the ATO as appropriate.

4.7 PROTECTIONS FOR INDIVIDUALS

Hollard and its subsidiaries are committed to protecting individuals who disclose Reportable Conduct under this Policy. Any such individuals will not be subject to disciplinary or any other action even under circumstances where no Reportable Conduct is found to have occurred (subject to section 4.8 below). They will also be protected from civil and criminal liability in relation to the making of the disclosure.

The individual must not suffer any detriment by having made a report, including any of the following:

- dismissal of an employee;
- injury of an employee in his or her employment;
- alteration of an employee's position or duties to his or her disadvantage;
- discrimination between an employee and other employees of the same employer;
- harassment or intimidation of a person;
- harm or injury to a person, including psychological harm;
- damage to a person's property;
- damage to a person's reputation;
- damage to a person's business or financial position;
- any other damage to a person; and
- threats of any of the above.

The Corporations Act makes it **illegal** (through a criminal offence and a civil penalty) for someone to cause or threaten detriment to you because they believe or suspect that you have made, may have made, or could make a whistleblower disclosure. Where any detriment is

occasioned on an individual by a Hollard Employee in reprisal for a report being made under this Policy, that will be treated as serious misconduct and will result in disciplinary action, which may include dismissal.

For the sake of certainty, the following is not detrimental conduct:

- administrative action taken to protect individuals who disclose Reportable Conduct, provided it is reasonable; and
- managing a discloser's unsatisfactory work performance in line with Hollard's performance management framework.

This Policy also does not grant immunity for any misconduct an individual who discloses Reportable Conduct has engaged in themselves.

Where an individual believes a person has acted contrary to the terms of this section 4.7, they may raise the matter directly with the Hollard Disclosure Officer, who will investigate it. They are also free to seek independent legal advice or lodge a complaint with ASIC, APRA or the ATO as appropriate if they believe they have suffered detriment.

An individual who suffers loss, damage or injury because of a disclosure may be entitled to compensation or other orders through the Courts where Hollard has failed to prevent it.

Protection of and support for Whistleblowers

Hollard will endeavour to protect individuals who disclose Reportable Conduct under this Policy and provide support to them, including in the following ways:

- Hollard's Disclosure Officer will consider the risk of detriment against the individual as soon as possible after receiving a disclosure and take any steps considered necessary to reduce that risk;
- individuals may contact the Whistleblower Support Officer directly to discuss concerns they have in relation to the disclosure, and steps that may be taken to reduce those concerns;
- any other support requested by the individual which, in Hollard's opinion, is reasonable.
- A confidential support and counselling program (Employee Assistance Program) is available to all staff.

Support for individuals mentioned in a disclosure

Hollard will treat any Hollard Employees mentioned in a disclosure made under this Policy or to whom such disclosures relate fairly, professionally and respectfully, including by:

- maintaining the confidentiality of those mentions where practical and appropriate in the circumstances;
- approaching and undertaking any investigation with due regard to procedural fairness and natural justice including by giving the individual and opportunity to respond to allegations made and by advising the individual when and to the extent required by those principles and prior to any actions being taken;
- advising the individual of the outcome of any investigation; and
- the confidential support and counselling program (Employee Assistance Program) which is available to all staff.

4.8 LOSS OF PROTECTION

You will still qualify for protection under the Whistleblower Protection Scheme and this Policy if the information disclosed turns out to be incorrect, provided you had reasonable grounds to suspect it was correct. Where, however, it is shown that you have made a false report without reasonable grounds then that conduct itself will be considered a serious matter. In that case, you will not be protected under this Policy and you may be subject to legal or disciplinary action which may include dismissal.

You may also not be protected under this Policy if you have been found to have been materially involved in conduct you are reporting, although in some cases the making of a report may be a mitigating factor.

5.0 MONITORING AND REPORTING

This Policy is approved by the Boards of Hollard. The focus of Board oversight is to ensure that anyone who reports any instances of suspected unethical, illegal or fraudulent conduct, or an improper state of affairs, involving Hollard or any of its subsidiaries has confidence that they can make a report without fear of intimidation, disadvantage, reprisal or other detriment.

Governance of this Policy is overseen by Hollard's Board Audit Committee. This responsibility includes ensuring this Policy is:

- legally compliant,
- operating effectively; and
- reviewed annually.

Additionally, the Board Audit Committee will consider whether those matters reported to it under this Policy have been dealt with appropriately by Hollard management and that trends, themes or emerging risks highlighted by disclosures are addressed and mitigated.

Internal Audit will undertake periodic monitoring of compliance with the Policy including to assess the adequacy and effectiveness of the Policy and associated process and report to the Board Audit Committee on any risks and issues identified.

6.0 EMBEDMENT AND CHANGE MANAGEMENT CONSIDERATIONS

Category	Checklist/Considerations
Target Audience (may be current or former status)	<ul style="list-style-type: none">• a director or officer of Hollard or its subsidiaries;• an employee of Hollard or its subsidiaries;• a supplier of services or goods to Hollard or its subsidiaries (whether paid or unpaid);• an employee of a supplier of services or goods to Hollard or its subsidiaries (whether paid or unpaid);• an associate of Hollard or its subsidiaries;• a relative of any of the above individuals; or• a spouse or dependent of any of the above individuals.

Making the policy available	<input type="checkbox"/> Hollard Intranet (under Frameworks/Policies, Governance and Risk & Compliance pages) <input type="checkbox"/> Hollard Website <input type="checkbox"/> Diligent (Board policies)
Communication/ Training required	<input type="checkbox"/> High level awareness (emails/short face to face briefing) <input type="checkbox"/> Training