

Concern Raising and Whistleblower Policy

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Approved by

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1. Overview

The Board and Senior Management actively encourage all Latitude employees, contractors, representatives and other relevant stakeholders to raise Concerns relating to real or perceived illegal, immoral or illegitimate practice associated with Latitude's operations in an environment free from victimisation or persecution, where people feel they can speak up or come forward to raise any wrongdoing.

The Policy and any supporting standards, procedures or guidance help ensure that Concerns are raised and appropriately investigated, with Concern Raisers and Whistleblowers informed and protected.

2. Scope

This Policy applies to all staff, representatives, and activities of KVD Australia HoldCo Pty Ltd and its related bodies corporate, and Latitude Financial Services Limited and its related bodies corporate (Latitude).

3. Policy Statements

3.1 Protecting Concern Raisers and Whistleblowers

Latitude will support and protect anyone who speaks up and raises a Concern.

Any form of victimisation or retribution against someone who raises a Concern, assists another party to raise a concern, or assists in the investigation of a concern, will not be tolerated.

Latitude will recognise and facilitate a Concern Raiser's right to remain anonymous, including where they may be classified as a Whistleblower under Australian and/or New Zealand law which will extend additional protections and may provide access to compensation and other remedies if loss is suffered.

The protection of confidentiality is also extended to volunteers of supporting information for a Concern.

3.2 Raising a Concern or Whistleblower Report

Latitude will recognise a Concern raised by a potential, current or former director, employee, officer, or contractor, supplier, service provider or retail partner.

Latitude will recognise a Whistleblower Report raised by a current or former director, employee, officer, or contractor. In Australia, Latitude will also recognise a Whistleblower Report raised by:

- a supplier of goods or services to Latitude
- an associate of Latitude, usually a person with whom Latitude acts in concert
- a spouse, relative or dependent of one of the people referred to above.

Latitude will ensure that Concerns and Whistleblower reports are able to be easily and safely raised through multiple internal and external channels.

3.3 Managing a Concern or Whistleblower Report

Latitude will designate eligible staff to receive and address Concerns and Whistleblower Reports that are raised and ensure they are appropriately managed.

Latitude will ensure that each Concern and Whistleblower Report will be acted upon in a timely and fair manner for all parties concerned. Latitude will fully co-operate with any authorised external party in receipt of and investigating a Whistleblower Report.

All matters will be carefully managed and oversight through to closure, with clear and regular communication with the Concern Raiser or Whistleblower.

Latitude will confidentially and securely maintain full records of all Concerns.

3.4 Awareness and Training

Latitude will ensure the Policy and any related standards, procedures or guidance are available to all employees through Latitude's intranet and referenced in the Code of Conduct.

Latitude will provide appropriate Concern and Whistleblowing training for all staff, and specific training for Concern Recipients, Case Owners and Conduct Champions.

3.5 Reporting

Latitude will provide Senior Management and Latitude Boards with regular reporting to ensure Concerns and Whistleblower reports are effectively managed.

4. Roles and Responsibilities

4.1 Concern Recipient

A Concern Recipient will be authorised to receive Concerns and Whistleblower Reports and to escalate the matter to the Concern Raising and Whistleblower Review Forum.

4.2 Concern Raising and Whistleblower Review Forum

The Concern Raising and Whistleblower Forum will consist of a General Manager from each of Risk, People & Change, Legal and Internal Audit. The Forum will review each Concern and Whistleblower Report, appoint a Case Owner, and determine next steps for any matter classed as a Whistleblower Report.

4.3 Case Owner

Case Owners will be appointed by the Concern Raising and Whistleblower Review Forum to undertake and/or provide oversight of Concern investigations through to closure, ensure the Concern Raiser, Whistleblower and others are afforded the applicable protection and that the Concern Raiser and/or Whistleblower is kept informed.

4.4 Conduct Champion

Latitude's Conduct Champions will help promote a culture of speaking up and be available as points of escalation for Concern Raisers and Concerns and Whistleblower reports.

4.5 Senior Management and People Leaders

Senior Management and other people leaders will set the 'tone from above', promote and uphold the principles in the Policy, respond to any raised Concern or Whistleblower Report, support investigations, and ensure any required change is implemented and communicated.

4.6 People & Change

People & Change will support investigations and ensure any required change is implemented and communicated. People & Change will work with Risk to promote and uphold this Policy and effect appropriate training and awareness.

4.7 Risk

Risk will be responsible for overall monitoring of compliance with and effectiveness of this Policy and any related standards, delivery of training and awareness, and for reporting.

Risk will maintain the relationship with an external organisation to provide Concern Raisers and Whistleblowers, who are not comfortable using internal channels, with a confidential and external channel.

4.8 Internal Audit

Internal Audit will conduct periodic reviews of the Concern Raising and Whistleblower Policy and any related standards, procedures and process, training and reporting, to provide assurance to the Board and Senior Management that they are effective and/or inform any areas that could be improved.

4.9 Board

The KVDA, LFSL New Zealand, and Hallmark Boards will review reporting associated with concerns and whistleblower matters to ensure management are appropriately addressing them and the root causes to ensure there are no systemic cultural or conduct issues.

5. Policy Governance

5.1 Review, Renewal and Approval

The Policy is a Tier 1 policy.

The GM Compliance and Conduct Risk will review the Policy at least annually. The EGM Risk is responsible for approving all non-material changes and recommending all material changes to the KVDA Board for approval.

The KVDA Board is required to review and approve the Policy at least once every three years, irrespective of the materiality of the changes made. The Hallmark Board are required to review and endorse the Policy. The Policy will be presented to the Latitude Financial Services Limited Board (NZ) for noting.

5.2 Monitoring and Control

Management will be responsible for identifying any instances of non-compliance, actual or potential, under the Policy through continued monitoring and supervision, annual self-assessments and other assurance activities. All identified areas of non-compliance must be escalated, with material breaches reported to the Board as soon as practical.

5.3 Exceptions

Any requests for exceptions to the Policy must be documented in writing and submitted to the Policy Owner for review and approval. Such requests must identify the entity, function and individual requesting the exception, and the nature, timing and duration of the exception. The request must also include corrective action plans to rectify the exception and a proposed timeline for completion of the same.

6. Revision History

Version	Approval Date	Changed By:	Summary of changes
1.0	27/09/2015 23/03/2016	CCO / Compliance Integrity Leader	Original
1.1	06/06/2016	Head of Compliance & Op Risk / Compliance Integrity Leader	Minor changes: Change of position title of owner, change to applicability section to make it clearer for Hallmark, slight wording changes, formatting changes and update of email contact.
1.2	13/06/2016	Nafiah Ansari Enterprise Risk	Updated cover page. Formatting has been updated to align to the new Policy template. No changes have been made to policy content.
1.3	24/02/2017	Head of Compliance & Op Risk / Compliance Integrity Leader	Changes to Applicability and Policy Governance made in line with new Policy Template. Hallmark specific matters acknowledged in 5. Concern Investigation and 8. Escalation. References to NZ authorities added.

Version	Approval Date	Changed By:	Summary of changes
1.4	09/02/2018	Head of Compliance & Op Risk / Compliance Integrity Leader	Reference to the new obligations of CPS 520 Fit and Proper added; KVD TM and LFSL acknowledged re breaches AUSTRAC acknowledged Changes to role titles acknowledged
2.0	15/05/2019	Head of Compliance & Op Risk / Compliance Integrity Leader	Change of ownership from Ho Compliance & Op Risk to Ho Regulatory & Compliance due to Organisational Changes. Broaden the whistleblower definition to include both current and former employees, officers, and contractors, as well as their spouses and dependents, and anonymous disclosures. Changes to the way concerns are raised, additional avenue through our 3 rd party provider Your Call with toll free lines in AU and NZ plus a 24/7 online portal. Multiple changes to the policy to meet the new Australian regulatory requirements following the release of the new Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2018. Updated approval for external investigator due to the Organisational Restructure.
3.0	24/08/2020	GM Compliance and Conduct Risk	New policy template applied Content updated to reflect requirements of new ASIC RG 270 Policy rewritten to be principles-based to provide greater clarity of intent and expectations. Moved guidance and explanatory information to a new Standard to support effective implementation of the Policy