LATITUDE

# Concern Raising (Whistleblower) Policy

## Table of Contents


1. Overview ..... 3

1.1 Effective Date ..... 3

2. Scope ..... 3

2.1 Excluded Matters ..... 3

3. Policy Statements ..... 4

3.1 Raising a concern ..... 4

3.2 Support and Protection ..... 4

3.3 Managing a concern ..... 6

3.4 Awareness and Training ..... 6

3.5 Reporting ..... 6

4. Roles and Responsibilities ..... 6

4.1 Leaders ..... 6

4.2 People & Culture, Risk and Legal ..... 7

4.3 Whistleblower Protection Officers (WPO) ..... 7

4.4 Internal Audit ..... 7

4.5 Board ..... 7

Addendum ..... 8

**Country Schedules** ..... 8

Australia 8

New Zealand ..... 9

Other Jurisdictions ..... 10

# 1. Overview

Maintaining good governance and corporate culture is essential for all entities within Latitude Group Holdings Limited and its related bodies corporate ("Latitude" or "the Latitude Group").

Creating an environment where people feel safe to speak up, without fear of harm, discrimination, or retaliation about concerns that Latitude or anyone connected with Latitude may be acting in a way that constitutes misconduct, underpins Latitude's culture.

When people do not speak up or feel unsafe to do so, this undermines the culture that Latitude aspires to have. The Board and Senior Management actively encourage speaking up about concerns at Latitude. No one is to be discouraged from speaking up or disadvantaged or victimised for doing so.

The Policy and any supporting standards, procedures or guidance help ensure that concerns are raised and appropriately investigated, with concern raisers being informed and appropriately protected.

The Policy should be read in conjunction with the Latitude Code of Conduct which details Latitude's expected standards of behaviour.

## 1.1 Effective Date

The Policy is effective from 26 November 2015 ("Effective Date").

# 2. Scope

This document applies to the Latitude Group, including:

- Our Board of Directors
- All Latitude employees, contractors, consultants and other persons representing Latitude.

It is important to Latitude that all current and former directors, employees, officers, contractors, suppliers, partners and their families, and dependents can raise a concern under the Policy.

Matters that might constitute misconduct covered by the Policy include:

- breaches of Latitude's Code of Conduct
- failures to comply with Latitude's policies
- failures to comply with applicable laws (including regulatory and prudential standards or industry codes of practice)
- unsafe work practices
- acts of dishonesty
- acts of fraud, theft, bribery and corruption
- unethical behaviour
- acts of improper conduct, bullying, harassment
- conflicts of interest, including those related to outside business interests and relationships
- behaviour that poses a risk to public safety, or the stability of or confidence in financial systems.

## 2.1 Excluded Matters

The Policy does not extend to matters which are more appropriately addressed under other policies and processes designed to ensure compliance with their respective regulatory requirements, that is:

- Customer complaints will be addressed in line with operational policies and processes
- Personal work-related grievances will be addressed in line with alternative Latitude policies and guidance, including the Code of Conduct.

# 3. Policy Statements

## 3.1 Raising a concern

Latitude will accept concerns via any method or channel, including in person, email or post, that a Concern Raiser feels the most comfortable using.

Latitude will provide an external channel, YourCall, for Concern Raisers who are not comfortable using or do not have access to other channels.

**YourCall**

Telephone 7am – midnight AEST, Business Days:
1300 790 228 (Australia)
0800 123 508 (New Zealand)
+61 3 9938 7027 (International)
Online 24/7: via Latitude intranet Connecting the Dots or direct to
www.yourcall.com.au/latitudefinancial
Email: info@yourcall.com.au
Mail: PO Box 137, Kew, Victoria 3101, Australia

While Latitude prefers that a concern be raised internally in the first instance or through the YourCall service, a Concern Raiser may directly approach an external party authorised by law (refer Addendum for a list of these authorities).

Concerns can be made to a Director or to the following Latitude Whistleblower Protection Officers (WPOs):

- Chief Risk Officer
- EGM People & Culture
- General Counsel
- Group GM Internal Audit and Operational Excellence.

Other individuals eligible to receive a concern are:

- EGMs
- GM Enterprise & Operational Risk and Compliance
- Senior Managers and People Leaders
- members of the People & Culture, Risk, Legal or Internal Audit teams
- Company Secretary
- an external auditor of Latitude.

However, unless there are exceptional circumstances (e.g., all WPOs are conflicted), all concerns received will be referred to at least one WPO to ensure they are appropriately assessed and investigated.

## 3.2 Support and Protection

Latitude will support and protect anyone who raises a concern honestly and ethically under the Policy. Latitude will also take all reasonable steps to provide protection to anyone who assists in the investigation of a concern.

Victimisation or retribution against someone who raises a concern, assists another party to raise a concern or assists in an investigation will not be tolerated, and may be subject to separate

investigation. Any instances where such detrimental conduct occurs should be immediately reported to a WPO or to YourCall. Confirmed instances of such detrimental conduct by a Latitude employee will be subject to potential outcomes in line with Latitude's Consequence Management Framework.

### 3.2.1 Cultural and Psychological Safety

Latitude's commitment includes fostering both cultural safety and psychological safety as core components of our governance and conduct expectations, fostering an environment where people feel respected, valued, and free from racism, discrimination, or cultural insensitivity. In the context of concern raising:

- Employees must feel safe to speak up regardless of cultural background, language, ethnicity, Indigenous identity, or social identity.
- Leaders and WPOs must engage in culturally respectful communication and decision-making.
- Investigations must consider cultural factors that may influence how a Concern Raiser interprets or experiences conduct.
- Latitude will ensure that processes do not unintentionally disadvantage culturally diverse or under-represented groups.

Cultural safety is essential to a psychologically safe workplace and supports compliance with our obligations under Work Health and Safety (WHS) laws, which recognise the role of **workplace interactions and behaviours** (including culturally unsafe conduct) as contributors to psychosocial harm.

| | |
|---|---|
| Where available, Latitude will provide employees, fixed term contingent workers and their immediate families who make or are thinking about making a report, and wish to seek additional support, with access to an Employee Assistance Program provided by Sonder, via their app.<br><br>Employees can find out more on Connecting the Dot's Wellbeing page | |

Latitude does not provide independent legal advice to Concern Raisers as to the application of and protections under the law for specific circumstances. Concern Raisers are encouraged to seek independent legal advice if they require further information regarding the application of the law in their country. Refer to the Addendum for a summary of country-specific legal protections.

Latitude will recognise and facilitate a Concern Raiser's right to remain anonymous, as it will any person who volunteers supporting information for a concern.

Latitude will maintain confidentially of all concerns made under the Policy to the fullest extent possible and will only share the identity of a Concern Raiser (if known), or information likely to reveal their identity, if consent is obtained, it is required by law, or Latitude requires legal advice.

When investigating a concern, Latitude may disclose information that could lead to a person being identified but will take all reasonable steps to reduce this risk.

Latitude will securely retain all files and records related to a concern and associated investigations.

Should any loss be suffered by Latitude deliberately failing to protect a person's anonymity, Latitude may provide access to compensation and other remedies.

### 3.3 Managing a concern

Latitude will ensure that each concern is acted upon in a timely and fair manner for all parties concerned.

After conducting preliminary inquiries, a decision will be made as to whether an investigation is possible and necessary.

Latitude will conduct all investigations in an objective, fair and reasonable way having regard to the nature and circumstances of the conduct being reported. Investigations will typically be undertaken by the People & Culture team,[1] under the guidance of a WPO. Where deemed necessary, investigations may be undertaken by an external third party (e.g., if specific skills or subject matter expertise are required, the People & Culture team are conflicted, or the concern is of a particularly serious or sensitive nature).

Latitude will, where appropriate, ensure there is clear and regular communication with the Concern Raiser on the status and outcome of their concern.

Where a concern is made anonymously, Latitude will conduct the investigation to the best of its abilities based on the information provided.

Where illegal conduct has been confirmed, Latitude may refer the matter directly to the police and/or other relevant authority/ies.

Latitude will fully co-operate with any authorised external party in receipt of and investigating a concern under the Policy.

### 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 Code of Conduct.

Latitude will provide general concern raising awareness training for all staff. More detailed training that includes the rights and obligations with respect to confidentiality and victimisation will be provided to WPOs.

### 3.5 Reporting

While maintaining Latitude's obligations of confidentiality to Concern Raisers:

- Compliance will be provided with monthly reports of concerns raised. These reports will serve to ensure concerns are be addressed in compliance with this policy and that systemic matters are identified and appropriately treated
- the Board and/or Board committees will be provided with reports in a timely manner of concerns raised under the Policy, any associated systemic issues identified and of any material incidents of non-compliance reported under the Policy.

## 4. Roles and Responsibilities

### 4.1 Leaders

Senior Management and people leaders are expected to promote and uphold the principles in the Policy, support investigations and ensure any required actions are implemented.

Senior management and people leaders should not conduct their own informal investigations.

[1] The People & Culture team will also observe any additional People-issued guidance re managing conduct-related concerns.

## 4.2 People & Culture, Risk and Legal

People & Culture, Risk and Legal teams will work together to ensure the Policy and any supporting standards are operationally effective, including but not limited to undertaking investigations, providing training and awareness, and reporting.

Risk will maintain the relationship with a third party(ies) to provide a confidential and external channel(s) for concerns to be raised.

## 4.3 Whistleblower Protection Officers (WPO)

WPOs are responsible for ensuring the right steps are followed to:

- support and protect Concern Raisers
- provide guidance and advice on how concerns are managed
- escalations to the Board.

## 4.4 Internal Audit

Internal Audit will conduct periodic reviews of the Policy and any related standards, procedures and process to provide assurance that they are effective and inform any areas that could be improved.

## 4.5 Board

The Board will encourage an ethical culture that values integrity, where Concern Raisers feel safe to speak up, formally endorsing the Policy.

The Board will ensure management are appropriately addressing concerns, and any broader trends and themes to ensure there are no systemic cultural or conduct issues.

# Addendum

## Country Schedules

### Australia

A concern is a whistleblower report where the person raising the concern has reasonable grounds to suspect Latitude or an officer/employee of Latitude of engaging in misconduct or an improper state of affairs/circumstances, and information is being disclosed in relation to:

- breaches of the Corporations Act
- breaches of other financial sector laws enforced by ASIC or Australian Prudential Regulation Authority (APRA)
    - the Australian Securities and Investments Commission Act
    - the Financial Sector (Collection of Data) Act 2001
    - the National Consumer Credit Protection Act 2009
    - an instrument made under an Act referred to in any of the above
- breaches of the AFIA Code of Practice
- breaches of any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months
- systemic issues that a relevant regulator should know about to properly perform its functions
- unethical business behaviour and practices that may cause consumer harm
- danger to the public or the financial system.

Whistleblower protection is afforded under the Corporations Act where the disclosure is made to:

- ASIC, APRA, another Commonwealth prescribed body relative to Latitude's operations or
- a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the concern
- internal or external auditor or actuary of Latitude
- a director, officer or senior manager of Latitude
- a Latitude Whistleblower Protection Officer as defined in Section 3.1 above
- any other person authorised by Latitude to receive whistleblower reports, refer 3.1 above

Whistleblower protection is also provided to any person who makes an allegation to the AFIA Finance Industry Code Compliance Committee regarding non-compliance with the AFIA Code of Practice, with protections as outlined by Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 if applicable.

"Reasonable grounds" means that a reasonable person in the same position as the Concern Raiser would also suspect the information indicates misconduct or a breach of the Law.

Public Interest Disclosure and Emergency Disclosure

Whistleblower rights and protections can also apply to the concern raiser where they make a whistleblower report to a journalist or a member of the Commonwealth Parliament or a State or Territory Parliament (Parliamentarian) as listed in the table below, in the event that:

- they have reasonable grounds to believe that action to address the concern is not being or has not been taken, and reporting the concern to a journalist or Parliamentarian is in the public interest (Public Interest Disclosure)
- they have reasonable grounds to believe the report concerns substantial and imminent danger to the health or safety of one or more people or to the natural environment (an Emergency Disclosure).

The protections will only apply in certain limited circumstances. If disclosure of the concern to the public is made in another way, the protections do not apply.

| **Public Interest Disclosures** | |
|---|---|
| **Criteria** | **The Law requires that:** |
| Previous report | A report to ASIC or APRA that satisfies the criteria of What is a whistleblower report? |
| 90 days | At least 90 days have passed since the concern raiser reported the concern to ASIC or APRA, and the concern raiser does not have reasonable grounds to believe that action to address the concern is being or has been taken |
| Public interest | The concern raiser has reasonable grounds to believe that reporting the concern to a journalist or Parliamentarian would be in the public interest |
| Written notice to ASIC or APRA | After 90 days from when the concern raiser reported to ASIC or APRA, the concern raiser gives ASIC or APRA a written notice that includes sufficient information to identify the earlier report and states the concern raiser's intention to make a Public Interest Disclosure. This could be by contacting the ASIC officer who considered the concern and quoting the reference number of the case |
| Journalist or Parliamentarian | The concern raiser reports their concerns about misconduct or an improper state of affairs or circumstances or a breach of the Law to a journalist or a Parliamentarian. The extent of the information disclosed is no greater than is necessary to inform the recipient about the concerns |
| **Emergency Disclosures** | |
| **Criteria** | **The Law requires that:** |
| Previous report | The concern raiser must have previously made a report to ASIC or APRA that satisfies the criteria of What is a whistleblower report? |
| Emergency | The concern raiser has reasonable grounds to believe that the information in the report concerns substantial and imminent danger to the health or safety of one or more people or to the natural environment |
| Written notice to ASIC or APRA | The concern raiser gives ASIC or APRA a written notice that includes sufficient information to identify the earlier report and states the concern raiser's intention to make an emergency disclosure. This could be by contacting the ASIC officer who considered the concern and quoting the reference number of the case |
| Journalist or parliamentarian | The concern raiser reports their concern about the substantial or imminent danger to a journalist or parliamentarian. The extent of the information disclosed is no greater than is necessary to inform the recipient about the substantial and imminent danger |

## New Zealand

Concerns raised are protected under the Protected Disclosures (Protection of Whistleblowers) Act 2022 (the 'Act') where:

- the concern raised is about "serious wrongdoing" in or by Latitude
- the concern raiser believes on "reasonable grounds" that the information is true, or likely to be true
- the concern is raised to Latitude or to an appropriate authority
- the reason for raising the concern was in order for the wrongdoing to be investigated
- the concern raiser is seeking the benefit of the protections afforded by the Act.

"Serious wrongdoing" includes but is not limited to:

- a criminal offence
- the unlawful, corrupt or irregular use of public funds or resources
- conduct that poses a serious risk to public health or safety, to the health or safety of any individual, to the environment, or to the maintenance of the Law
- a grossly improper act or omission by a public official.

"Reasonable grounds" means that a reasonable person in the same position as the person raising the concern would also suspect the information indicates misconduct or a breach of the Law.

An "appropriate authority" includes but is not limited to

- the Financial Markets Authority
- the Commerce Commission
- the Ministry of Business, Innovation, and Employment
- the Privacy Commissioner
- WorkSafe New Zealand (where work-related)
- the Human Rights Commission
- the Commissioner of Police
- the Director of the Serious Fraud Office
- the Inspector-General of Intelligence and Security
- the Solicitor-General
- the Health and Disability Commissioner
- the Ombudsman
- an industry body which has power to discipline its members.

Raising concerns in bad faith, or direct to the media or social media will not be offered the protections of the Act.

## Other Jurisdictions

Although Latitude ceased operations in Malaysia, Singapore and Canada in 2024, the ability for anyone to raise a concern in those jurisdictions remains and Latitude will treat Concern Raisers and Whistleblowers in these jurisdictions in accordance with the Policy and relevant local regulatory expectations.