

eftpos Whistleblower Policy

1. Purpose

The eftpos Whistleblower Policy documents eftpos' commitment to maintaining a working environment in which Directors, employees, contractors and visitors are able to report suspected instances of unethical, unlawful or undesirable conduct without fear of intimidation or reprisal. The purpose of the policy is to assist eftpos in the detection and resolution of unacceptable conduct and to protect those persons who raise issues of unacceptable conduct.

2. Scope

This policy covers all eftpos Directors, employees, contractors and visitors.

3. Definitions and Interpretation

3.1 Definitions

Officer (as defined in the Corporations Act 2001 C'th) includes:

- (a) a director or secretary of the Company; or
- (b) a person:
 - (i) who makes, or participates in making, decisions that affect the whole, or a substantial part, of the business of the Company; or
 - (ii) who has the capacity to affect significantly the corporation's financial standing; or
 - (iii) in accordance with whose instructions or wishes the directors of the corporation are accustomed to act (excluding advice given by the person in the proper performance of functions attaching to the person's professional capacity or their business relationship with the directors or the Company).

Protected disclosure is where a Whistleblower will be protected under this policy from reprisal or repercussions from the Company arising from the disclosure of alleged unacceptable conduct. This is provided that the disclosure is made in good faith, is based on reasonable grounds and is made in accordance with this policy.

Protected Disclosure Officer is the Company Secretary, General Counsel or the Chair of the Risk and Internal Audit Committee.

Whistleblower is any:

- (a) current or former employee, Officer, contractor;
- (b) Spouse, child or dependent of a current or former employee, Officer, contractor;
- (c) Journalist (in circumstances specified under the Corporations Act),

who, whether anonymously or otherwise discloses or attempts to disclose allegedly unacceptable conduct in accordance with this policy.

Unacceptable conduct is

- (a) conduct representing a danger to the public or the financial system;
- (b) an offence under Commonwealth law with a penalty of more than 12 months' imprisonment for any person within the Company; or
- (c) misconduct or improper state of affairs within the Company.

If proven constitutes an illegal act or omission, a criminal offence or is reasonable grounds for dismissing or terminating the person who engaged in the conduct.

4. Responsibility

4.1 There are two (2) key parties with responsibilities in the area of the Whistleblower Policy.

- a. Employees: To adhere to the guidelines established in this policy.
- b. Leadership Team and Managers: To enforce this policy within their department and to ensure compliance and understanding.

5. Policy

5.1 Disclosure of Information

Current employees who are concerned about misconduct are encouraged to report matters in the first instance to their manager. Where this is not appropriate or the Whistleblower feels uncomfortable or the Whistleblower is not a current employee, then alleged unacceptable conduct should be reported to the Protected Disclosure Officers or by anonymous mail or anonymous online disclosure. The Protected Disclosure Officers shall consider what further action, if any, is to be taken. This may involve engaging external professionals to assist in any investigation process.

5.2 Disclosure details

Disclosures can be:

- (a) send by email to: wb_distribution@eftposaustralia.com.au;
- (b) Sent by anonymously online through:
<http://www.eftposaustralia.com.au/about/whistleblower>; or
- (c) posted to:
The Protected Disclosure Officer
eftpos Australia
Level 11, 45 Clarence St
Sydney NSW 2000.

Disclosures can be anonymous.

6. Protecting the Whistleblower

6.1 eftpos is committed to the protection of Whistleblowers against action taken or threatened in reprisal for making protected disclosures. The Whistleblower needs to have objectively reasonable grounds to suspect unacceptable conduct has occurred.

eftpos will use all reasonable efforts to protect the identity of the Whistleblower. However, eftpos reserves the right to disclose:

- (a) the identity of the Whistleblower;
- (b) the information disclosed by the Whistleblower; and/or
- (c) information that may lead to the identification of the Whistleblower;

where:

- (d) the Whistleblower has given their consent to the disclosure;
- (e) the disclosure is required by law;

- (f) the disclosure is made to the Australian Securities and Investments Commission, the Australian Prudential Regulation Authority and/or the Australian Federal Police.

7. Records

There are no records applicable to this policy except in the event of a breach in which case the records, as outlined in the *eftpos Counselling and Discipline Policy*, apply.

8. Policy owner and administrator

Policy owner Company Secretary
 Reviewed on 1 August 2018

Approval and revision frequency and history

This policy will be reviewed every 36 months and may be updated or reissued by eftpos at any time.

This policy was last approved by the Board on: 4 October 2018.

Revision history

Date	Revision details
1 June 2010	Initial policy
6 August 2013	Formatting and change of titles
29 July 2015	Formatting and change of titles and approval body now the FR&AC
3 February 2016	Added General Counsel to list of Protection Disclosure Officers
24 May 2017	Reviewed – no change
28 June 2017	Put to FR&AC for approval
1 August 2018	Amended for changes in law – put to Board 4 October 2018