

Whistleblower Policy

Endorsed by the Board of Directors 5 December 2025

1. Policy Purpose

Peoplecare promotes a culture of integrity and accountability and an environment that encourages and supports people to feel safe to speak up about misconduct.

The purpose of the Whistleblower Policy is to provide guidance for individuals to disclose potential wrongdoing safely, securely and with assurance that they will be supported and protected and to encourage the reporting of such conduct.

This policy also outlines the processes that will be taken in response to whistleblowing reports and should be read in conjunction with the Whistleblowing Procedure.

This policy provides transparency around Peoplecare's processes for receiving, handling and responding to disclosures and ensures that disclosures are dealt with appropriately and in a timely manner.

Peoplecare encourages disclosure of potential misconduct and has adopted an '*if in doubt report*' approach to reporting potential misconduct.

2. Scope

This policy applies to all Peoplecare employees (both current and former), Contractors, Suppliers, Directors, and relatives, dependents and spouses of the aforementioned. This is further detailed in section 6 Eligibility to Make a Disclosure.

This policy does not apply to members. The Peoplecare Complaint Policy should be followed in instances where members are concerned about potential wrongdoing.

This policy does not apply to personal, work-related grievances, for instance matters that relate to interpersonal conflicts, terms of employment, transfers, promotions, performance, discipline, and where the matter does not have any significant implications for Peoplecare. In instances of work-related grievances employees should refer to the Peoplecare Internal Grievance Process. More detail about the eligibility of work-related grievances under this policy are detailed in section 5.

3. Definitions

Term	Definition
APRA	Australian Prudential Regulation Authority
ASIC	Australian Securities and Investments Commission
Board	Board of Directors of Peoplecare Health Limited
Corporations Act	Corporations Act 2001 (Cth)

Detriment	Detriment includes dismissal, injury in employment, alteration of duties to disadvantage, discrimination, harassment, intimidation, harm or injury, damage to property, damage to reputation, damage to business or financial position, or any other damage to a person.
Eligible Recipient	A person to whom you can make a disclosure to under this policy and detailed further at section 7 of this policy.
Peoplecare	Peoplecare Health Limited and its related entities as defined by the Corporations Act
Qualifying Disclosure	A report made by a Whistleblower, to an Eligible Recipient, that concerns Reportable Conduct and is made on Reasonable Grounds.
Reasonable Grounds	Objectively reasonable grounds. that a reasonable person in your position would also suspect indicates misconduct or an improper state of affairs or circumstances.
Reportable Conduct	Where a person has Reasonable Grounds to suspect misconduct or an improper state of affairs or circumstances in relation to Peoplecare. Further detail and examples provided at Section 5.
Whistleblower	The person who makes the disclosure of Reportable Conduct and offered protection under the Corporations Act. The person must satisfy the eligibility criteria in section 6 to be eligible for whistleblower protections.
Whistleblowing	Whistleblowing is the practice of making a disclosure of information when you have Reasonable Grounds to suspect Reportable Conduct.
Whistleblower Investigation Officer (WIO)	WIO may be a Peoplecare employee or officer, or an external investigator, taking into account the nature and circumstances of the information disclosed.
Whistleblower Protection Officer	Nominated Peoplecare employees who have specific whistleblower responsibilities under this policy including the protection and safeguarding of the interests of the Whistleblower.

4. Reportable Conduct

Peoplecare encourages the disclosure of any instances of Reportable Conduct. Individuals should make a disclosure under this policy if they have Reasonable Grounds to suspect that conduct, or a state of affairs exists, in relation to Peoplecare that is any of the following:

- misconduct, or an improper state of affairs;
- a contravention of any law administered by ASIC or APRA;
- conduct that represents a danger to the public or the financial system (even if this conduct does not involve a breach of a particular law);
- conduct that is an offence against any law of the Commonwealth, where the offence is punishable by imprisonment for a period of 12 months or more.

Reportable Conduct may include:

- criminal activity;
- failure to comply with, or breach of legal or regulatory requirements;
- fraud, bribery or corruption;
- serious breaches of Peoplecare's Employee Code of Conduct;
- dishonest or unethical behaviour;
- serious or undisclosed conflicts of interest, including those relating to outside business interests, relationships, and improper payments;
- irregular use of company funds or practices (including misleading accounting or financial reporting practices);
- non compliance with the criteria required as a Fit and Proper person;
- conduct seriously endangering health and safety or causing serious damage to the environment;
- unauthorised use of Peoplecare's confidential information or intellectual property;
- conduct likely to damage the financial position or reputation of Peoplecare;
- deliberate concealment of any of the above.

A disclosure that is solely about a personal work-related grievance is not considered a Qualifying Disclosure and is generally not covered by this policy or the *Corporations Act*. However, a disclosure of a personal work-related grievance may still fall under the whistleblower provisions if:

- the person suffers, or is threatened with, detriment for making the disclosure, as detailed in section 9 of this policy;
- the disclosure includes information about misconduct, an improper state of affairs or circumstances, a breach of the law, or danger to the public or the financial system, in addition to the personal work-related grievance; or
- the disclosure suggests misconduct that has significant implications for Peoplecare beyond the discloser's personal circumstances.

Disclosures that don't relate to Reportable Conduct are not considered whistleblowing and do not qualify for protection under the *Corporations Act*. These disclosures will instead be handled in accordance with the relevant Peoplecare policies and procedures.

5. Eligibility to Make a Disclosure

An individual is eligible to make a disclosure of Reportable Conduct as a Whistleblower if they are:

- a. a current or former employee, including employees who are permanent, part-time, fixed term or temporary, interns, secondees and managers;
- b. a current or former officer or associate of Peoplecare, for example a director or company secretary;
- c. a service provider or contractor who is providing, or has provided goods or services to Peoplecare, whether paid or unpaid, including their employees; and
- d. a relative, dependent, or spouse of an individual identified in (a) to (c) above.

Disclosures of Reportable Conduct must be made to an Eligible Recipient to be entitled to whistleblower protection under the *Corporations Act*. Disclosures made to someone who is not

identified as an Eligible Recipient identified in section 7 of this policy will not qualify for whistleblower protection.

6. Eligible Recipients

Peoplecare has two appointed Whistleblower Protection Officers (WPO). WPO's are responsible to safeguard the interests of Whistleblowers who make disclosures under this policy and to ensure the integrity of reporting. The WPO can also be contacted to obtain more information prior to making a disclosure.

Brett Wright – Chief Risk Officer
Email: Brett.Wright@peoplecare.com.au
Phone: 02 4224 4826

Holly Allen – Governance Manager
Email: Holly.Allen@peoplecare.com.au
Phone: 02 4224 4360

Your Call has been appointed by Peoplecare to provide a confidential and external process for reporting wrongdoing. Your Call provides secure online reporting across all devices and telephone hotline reporting avenues. Your Call acts as the conduit between the Whistleblower and Peoplecare. Reports can be made via the phone or online.

Phone: 1 300 790 228

Web: yourcall.com.au/peoplecare

The Your Call service operates 24 hours a day, seven days a week.

Disclosures of Reportable Conduct can also be made to any of the following Eligible Recipients.

1. Peoplecare Officials:
 - Director
 - Company Secretary
 - Chief Executive Officer
 - Members of the Executive Team
2. Auditors and Actuaries:
 - Auditor or a member of the appointed auditors for Peoplecare
 - Actuary of Peoplecare
3. External Independent Whistleblower Service
 - Your Call (details provided above)

Peoplecare encourages internal reporting in the first instance. Internal reporting channels provide an early warning system that may allow Peoplecare to address misconduct before issues escalate to more serious regulatory or reputational issues. Where a Whistleblower doesn't feel comfortable making an internal report or has made a report and no action has been taken within a reasonable timeframe, external reporting and follow up are available through the independent contracted whistleblower service, Your Call.

Disclosures can also be made to a legal practitioner for the purposes of obtaining legal advice or legal representation about the whistleblower requirements.

Disclosures can be made directly to regulatory bodies ASIC and APRA.

In certain circumstances, public interest disclosures or emergency disclosures can be made to a journalist or parliamentarian. There are explicit criteria for making public interest disclosures or emergency disclosures and it is strongly recommended that Whistleblowers obtain independent legal advice in the first instance, to ensure complete understanding of the criteria for making a public interest or emergency disclosure that qualifies for whistleblower protection under law.

7. Making a Disclosure

To be eligible for the protection offered to whistleblowers under the *Corporations Act* the disclosure needs to be considered a Qualifying Disclosure.

A Qualifying Disclosure is a disclosure of information from a Whistleblower, as per section 6 of this policy, who has Reasonable Grounds to suspect that the information pertains to Reportable Conduct.

When making a disclosure of Reportable Conduct the Whistleblower should have Reasonable Grounds to suspect the information, they are disclosing is true and accurate. Deliberate false reporting will not be covered by this policy and will not be a Qualifying Disclosure.

Reports should provide sufficient detail to enable a thorough assessment of the situation. Sufficient detail includes, but is not limited to:

- Full names of persons against whom the allegation is made;
- Dates, times and locations;
- Factual description of the alleged inappropriate behaviour; and
- Documented evidence, where available.

It is not the role of the Whistleblower to investigate or prove the Reportable Conduct has occurred.

Disclosures are treated confidentially to the extent possible and when a report is made under this policy, either directly to an Eligible Recipient or through the whistleblower hotline, Whistleblowers will be asked how they would prefer their identity to be handled.

Anonymity and use of a pseudonym is allowed; however, this can impact on the efficiency and effectiveness of investigation into any Reportable Conduct. Disclosers who wish to remain anonymous are encouraged to make a disclosure via the Your Call service, which has systems in place to facilitate on-going communication whilst remaining anonymous.

In the event a disclosure of Reportable Conduct involves a member of the Executive Team or a WPO, the disclosure will be escalated to the Chair of Risk Committee or in their absence the Chair of the Board for assessment and further action.

8. Protection for Whistleblowers

Under the *Corporations Act*, whistleblowers (including those who made reports on an anonymous basis) who meet the eligibility criteria are entitled to specific legal protections. These include the right to have their identity and the information they provide kept confidential, protection from legal action (such as civil or criminal proceedings), and safeguards against any form of detriment such as dismissal, disciplinary action, or other unfair treatment which occurs as a direct result of making a disclosure.

These protections are an essential element to create an environment in which Whistleblowers feel safe to raise Reportable Conduct.

8.1 Protection of Information and Confidentiality

The identity, or information that may lead to the identification of a Whistleblower will be treated in accordance with the *Corporations Act* ensuring that it is held in the strictest confidence and not disclosed to parties unrelated to the investigation.

All information, documents, records and reports relating to the investigation of a disclosure of Reportable Conduct will be confidentially stored and retained in an appropriate and secure manner.

A Whistleblower's identity will not be disclosed without consent unless it is required or authorised by law (for example, where it is reasonably necessary for investigating the issues raised in the disclosure).

In some instances, Peoplecare may be obliged to share the identity of a Whistleblower to APRA, ASIC or the Australian Federal Police, for example in connection with an investigation into the disclosure or to a legal practitioner for the purpose of obtaining legal advice or representation in relation to the matter of Reportable Conduct.

It is illegal to disclose the identity or information that is likely to lead to the identification of the Whistleblower, except in the circumstances required or authorised by law. Complaints about a breach of confidentiality can be made to the Chief Risk Officer, Your Call or a regulator such as ASIC or APRA.

8.2 Protection Against Legal Action

The *Corporations Act* provides protection for Whistleblowers, including protection from a range of negative consequences that might otherwise arise from making a disclosure. These protections mean that a Whistleblower cannot be subject to criminal charges, and the information they disclose cannot be used against them in a criminal case, unless it turns out the disclosure was deliberately false. Whistleblowers are also protected from civil legal action, such as being sued for breaching an employment contract, confidentiality agreement, or other legal obligations.

This protection does not grant immunity for any misconduct that the Whistleblower may have been involved in that is revealed in the disclosure, although voluntary self-reporting may be considered by the regulator in event of any legal proceedings.

8.3 Protection Against Detriment

A Whistleblower must not be subjected to Detriment because they have disclosed a matter. Peoplecare encourages the reporting of Reportable Conduct and has safeguards in place to protect Whistleblowers from Detriment arising from the making of a disclosure.

It is unlawful to cause Detriment to any person on the belief or suspicion that a disclosure of Reportable Conduct has been, or will be, made, regardless of whether the disclosure was made.

Reasonable administrative or management action such as managing unsatisfactory work performance does not constitute a detriment if the action taken is consistent with Peoplecare's performance management process. Any restructure or redundancy due to genuine business needs is also not considered detrimental conduct where the process is consistent with Peoplecare policies and procedures.

An administrative action that is reasonable for the purpose for protecting the Whistleblower from risk of detriment is not detrimental conduct. For example, asking to perform duties from another location, reassigning to another role at the same level, making other modifications in the workplace or the performance of work duties.

Any concerns of detrimental conduct should be immediately reported to the WPO or Your Call.

8.4 Compensation and other Remedies.

In line with the protections under the *Corporations Act*, if a Whistleblower believes that they have suffered loss, damage or injury as a result of disclosing Reportable Conduct they may be entitled to seek compensation or other remedies through the courts. Whistleblowers are encouraged to obtain independent legal advice about their rights and the remedies that may be available to them in such circumstances.

9. Investigating a Disclosure

All disclosures of Reportable Conduct will be dealt with promptly, fairly and objectively. Peoplecare's response to a disclosure will vary depending on the nature of the information provided. All disclosures will be assessed to determine if they can be addressed and resolved informally or if a formal investigation is required.

Upon receipt of a disclosure, the WPO or delegate in case of escalation, will conduct a preliminary assessment to determine whether the disclosure:

- is or may be a legitimate disclosable matter,
- was made by an eligible Whistleblower, and
- can be resolved informally or if a formal investigation is required.

Where reasonably possible and having regard to any confidentiality obligations, the WPO will notify the CEO, where the disclosure does not involve them, within 24 hours of receiving the disclosure and complete the preliminary assessment within 5 business days of receipt of the disclosure.

All disclosures will be acknowledged by the WPO, or delegate in case of escalation, will be a point of contact for the Whistleblower and keep them informed throughout the process.

9.1 Where there is Insufficient Evidence of Reportable Conduct

If it is determined by the WPO that the disclosure does not identify Reportable Conduct or that the discloser is not an eligible Whistleblower, or there is insufficient information or evidence to warrant further investigation, the Whistleblower will be informed at the earliest possible opportunity.

In that event, no further action will be taken under this policy and the Whistleblower will be advised accordingly by the WPO.

If the disclosure indicates other inappropriate conduct, for example, harassment, discrimination or bullying, the WPO may, where appropriate, refer the matter for consideration in line with Peoplecare's relevant policies and procedures.

9.2 Where Further Investigation may be Warranted

Where the assessment establishes that the discloser qualifies as an eligible Whistleblower and there is evidence, or a reasonable suspicion of evidence, of Reportable Conduct, the WPO will commence an investigation and notify the Whistleblower, the CEO, the Chair of the Board and Chair of the Risk Committee.

The WPO will appoint a Whistleblower Investigation Officer (WIO). The WIO may be a Peoplecare employee or officer, or an external investigator, taking into account the nature and circumstances of the information disclosed.

Any investigation will depend on factors including the nature of the disclosure and may involve:

- interviewing relevant witnesses;
- collecting and considering any relevant documentary evidence;
- making a determination based on sound, objective evidence;
- documenting the findings.

At the conclusion of the investigation and subject to confidentiality requirements, and the need to protect the whistleblower's identity, the investigator will report their findings to WPO.

The WPO refers report to the Board Chair and the Risk Committee, except where this would create an actual or perceived conflict of interest. In those circumstances, those with a potential or actual conflict of interest will not be involved in the investigation and the matter will instead be referred to an alternate internal independent party. If due to the nature of the disclosure an internal party is unable to be independent the matter will be referred to the Board who will appoint an independent officer. Any person with a potential conflict of interest that may have been implicated in the disclosure, will not participate in the reporting, review or decision making process.

The Risk Committee, in collaboration with the Board Chair (or alternate Officer if applicable), will review the investigation report and findings, determine an appropriate course of action and make recommendations to the Board.

In the event the Board as whole are mentioned in a disclosure, an assessment will determine if any existing directors are excluded from the disclosure or whether an alternate Director is required to be delegated in line with section 8 – Delegating Powers of the Peoplecare Constitution.

Once a determination has been made, the Whistleblower will be informed that the investigation has concluded and, where appropriate in the determination of the Risk Committee, provided with a summary of the outcome. The level of detail provided may be limited to preserve confidentiality, protect the privacy and legal rights of individuals, and to ensure compliance with the whistleblower protections under the Corporations Act.

10. Fair Treatment

All Peoplecarers involved in the disclosure will be provided with the contact details for Peoplecare's EAP and, where appropriate, will be offered the support of an independent support person from the People and Culture team.

Although Peoplecare will endeavour to support all Whistleblowers, it will not be able to provide the same practical support to non-employees that it provides to Peoplecarers. Consequently, the support provided will be adapted and applied to the extent reasonably necessary.

Any person mentioned in the disclosure or to whom the disclosure relates will be afforded fair treatment and procedural fairness in any investigation, including by being provided with an opportunity to respond to allegations, to the extent possible as determined by Peoplecare, of Reportable Conduct made against them.

An employee or officer who is implicated may be temporarily stood down on full pay whilst an investigation is in process or may be temporarily transferred to another office or department, if appropriate in the circumstances. Any such stand-down or temporary transfer may only continue for the duration of the investigation. If the investigation determines that the allegations are not substantiated, the employee or officer must be immediately reinstated to full duties.

11. Training and Awareness

This policy is made available to all officers and employees of Peoplecare via internal channels, with Peoplecare employees receiving training on the policy. This policy is also available on the Peoplecare website.

All Eligible Recipients are provided with training about the policy and their obligations as an Eligible Recipient.

The Risk Committee will be regularly provided with updates on any disclosures. The Risk Committee is responsible for the review of the Whistleblowing Policy and recommending it to the Board.

12. Roles and Responsibilities

Role	Responsibility
Eligible Recipient	Receives the disclosure of Reportable Conduct and refers to the WPO or delegate.
Your Call	Independent Whistleblower service provider. Receive reports of Reportable Conduct and refers them to WPO or delegate. This service also allows discloser to make a disclosure to Peoplecare anonymously.
Whistleblower Protection Officers	Safeguards the interests of the whistleblower making reports under the Whistleblower Policy and ensures the integrity of the reporting mechanism. Their role is to assess the matter and determine the recommended next steps. If an investigation is required, they will assign an appropriate person to investigate it.
Whistleblower Investigation Officer	The person responsible for conducting the investigation, nominated by the Executive Team or Whistleblower Protection Officer. May be internal or external. Responsible for gathering evidence and preparing a report on findings.
Chief Executive Officer (CEO)	Sets the tone of the organisation to encourage integrity, transparency and a culture of reporting. Oversight of the policy and process to ensure resources and protections are in place.
Chief Risk Officer (CRO)	Responsible for maintaining independent oversight over the Whistleblower Procedure. In the event the disclosure is about the CRO this responsibility is delegated to the Chair of the Risk Committee.
Chair of Risk Committee	Oversight of the assessment and investigation process in the event the disclosure of Reportable Conduct involves a member of the Executive Team or a WPO.
Risk Committee	Critically review the investigation report and findings to form their view in relation to appropriate action and will refer their recommendations to the Board for approval.

Board of Directors	Provides oversight of whistleblowing within Peoplecare. Ensures the policy supports ethical governance, monitors reporting trends and outcomes. Responsible for making a final determination taking into consideration the recommendations proposed by the Risk Committee.
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