

Whistleblower Policy

1. Purpose

Mortgage Choice Limited and its wholly-owned subsidiary, Mortgage Choice Financial Planning Pty Ltd (collectively referred to in this Policy as Mortgage Choice) are committed to ensuring that its directors, officers and employees are able to work within a corporate culture where openness and accountability is essential. Mortgage Choice's Corporate Code of Conduct expects that they shall observe the highest standards of fairness, honesty, integrity and ethical behaviour in performing their respective duties and in dealing with Mortgage Choice's officers, franchisees, employees, shareholders, customers, and suppliers.

Mortgage Choice takes unacceptable, undesirable, unlawful or unethical conduct seriously. If there is a suspicion that anything is not right, then Mortgage Choice encourages its directors, officers and employees to speak up and voice their concerns by reporting such conduct without fear of intimidation or reprisal.

2. Scope

This Policy applies to all current and former Mortgage Choice directors, company secretaries, employees, and individuals who are suppliers to Mortgage Choice (including supplier's employees) as well as the spouse, relative or dependant of any of the foregoing individuals. Such persons are eligible to make Whistleblower Reports and are encouraged to speak up if they have information about potential misconduct.

This Policy has been prepared in accordance with the Corporations Act and the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations, 4th Edition.

3. Policy Requirements

3.1 Potential Misconduct

Anyone with information about potential misconduct is encouraged to report that information to a Whistleblower Officer (see section 3.2.1 below).

Potential misconduct is any suspected or actual misconduct or improper state of affairs or circumstances in relation to Mortgage Choice. This includes conduct in relation to an employee or officer of Mortgage Choice.

Some examples of potential misconduct include:

- breach of laws or regulations;
- breach of Mortgage Choice's Corporate Code of Conduct or other Mortgage Choice policies, standards or codes;
- criminal activity;
- bribery or corruption;
- conduct endangering health and safety, or causing damage to the environment;
- information that indicates a danger to the public or to the financial system;
- conflicts of interest;
- dishonest or unethical behaviour;
- anti-competitive behaviour;
- victimisation or harassment;
- financial fraud or mismanagement;
- insider trading;
- unauthorised use of Mortgage Choice's confidential information;
- conduct likely to damage Mortgage Choice's financial position or reputation; and
- deliberate concealment of the above.

Potential misconduct does not generally include personal work-related grievances. Personal work-related grievances are grievances relating to your employment that have implications for you personally (such as a

disagreement between you and another employee or a decision about your promotion). Generally, these grievances should be referred to the General Manager, Human Resources to allow those issues to be resolved most effectively. In some cases, these grievances may qualify for legal protection (see Attachment 1).

Customer complaints are also outside the scope of this Whistleblower Policy and should be referred to Lending Operations.

3.2 Making A Whistleblower's Report

If you wish to make a Whistleblower Report, you should have reasonable grounds to believe the information you are disclosing is true, however you will not be penalised if the information turns out to be incorrect.

A person should not make a Whistleblower Report that is knowingly false or misleading. Where it is found that a person has knowingly made a false report, this will be considered a serious matter and will result in disciplinary action.

A Whistleblower Report should include a description of the potential misconduct. You should include as much detail as possible, such as the date, time, location, name of the person(s) involved, names of any witnesses and any other information which may be relevant.

It is not the Whistleblower's job to investigate or prove the information contained in the Whistleblower Report. This will be the responsibility of the relevant investigator.

3.2.1 Whistleblower Officers

Whistleblower Reports can be made either in person, by telephone or in writing with the following Whistleblower Officers who are authorised under this Policy by Mortgage Choice to accept Whistleblower Reports:

- the General Counsel and Company Secretary;
- the General Manager, Human Resources;
- the Chief Financial Officer;
- the Chairman of the Audit and Risk Committee (ARC); or
- the Chief Executive Officer (CEO).

The contact details of the Whistleblower Officers can be found on the Mortgage Choice Google Contacts List or obtained by contacting 13 77 62 and requesting the details for the relevant Whistleblower Officer.

3.2.2 Anonymous reports

You can make an anonymous report if you do not want to reveal your identity. However, Mortgage Choice encourages you to provide your name because it will make it easier to investigate and address your report.

If you do not provide your name, any investigation will be conducted as best as possible in the circumstances. However, an investigation may not be possible unless sufficient information is provided, and it may make it difficult to offer you the same level of practical support if Mortgage Choice does not know your identity.

If you do provide your name, it will only be disclosed if you provide your consent, or in exceptional circumstances where the disclosure is allowed or required by law (e.g. in dealings with a regulator). If you have concerns about this, you can discuss this with the Whistleblower Officer.

3.3 Whistleblower Report Investigation

A Whistleblower Officer who receives a Whistleblower Report must promptly notify the CEO upon the receipt of a Whistleblower Report, unless the Whistleblower Report relates to the CEO (or a member of the Executive Leadership Team), in which case the Chairman of the ARC must be promptly informed.

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Unless the CEO or Chairman of the ARC (as appropriate) determines otherwise, the Whistleblower Report will be referred to the General Counsel and Company Secretary to manage the investigation process. In appropriate circumstances, the ARC Chairman may decide to appoint external investigators.

Mortgage Choice's response to a Whistleblower Report will vary depending on the nature of the report and the amount of information provided. All Whistleblower Reports will be assessed and considered by Mortgage Choice to determine whether the report should be formally investigated. A Whistleblower Report may be dealt with informally (for example, by assisting employees to change their behaviour) or through formal investigation.

Investigations will follow a fair process, be conducted in a timely manner and will be independent of any person(s) about whom allegations have been made. An investigator may only investigate a matter if the investigator can do so in an impartial manner (eg, the investigator will not investigate any Whistleblower Report which relates to their own Business Unit).

All employees and contractors must cooperate fully with any investigations.

Where considered appropriate, persons against whom an allegation has been made will be provided with details of the report (to the extent permitted by law) and be afforded an opportunity to respond.

At the end of the investigation, the investigator must report their findings to:

- the Chairman of the ARC; and
- if the CEO (and other members of the Executive Leadership Team) is/are not implicated, to the CEO, who will determine the appropriate response.

Responses to investigations may include appropriate disciplinary action, rectifying any conduct that was the subject of the Whistleblower Report and implementing any remedial action necessary to prevent any future occurrences of the same or similar conduct.

If practicable and appropriate, investigators will provide a Whistleblower with feedback on the progress and expected turnaround times for the conduct of the investigation. Once the investigation is completed, a verbal update will be provided to the Whistleblower (where the Whistleblower has disclosed their name) to the extent possible within commercial, legal and confidentiality constraints.

3.4 Protections For Whistleblowers

3.4.1 Protection of Whistleblower's Identity

Mortgage Choice will look to protect the identity of a Whistleblower.

Your identity (and any information Mortgage Choice has because of your Whistleblower Report that someone could likely use to work out your identity) will only be disclosed if you give your consent to Mortgage Choice to disclose that information or in exceptional circumstances where the disclosure is allowed or required by law.

3.4.2 General Protection of a Whistleblower

Mortgage Choice is committed to ensure that any Whistleblower who makes a Whistleblower Report is protected and is not subjected to any detriment.

The protections offered will depend on things such as the potential misconduct and people involved. Protections may include the following:

- monitoring and managing the behaviour of other employees;
- relocating employees (which may include the people alleged to have been involved in the potential misconduct) to a different division or office;
- offering you a leave of absence or flexible workplace arrangements while a matter is investigated;
- access to Mortgage Choice's Employee Assistance Program: <https://sites.google.com/a/mortgagechoice.com.au/hr-online/policies-and-procedures/employee-assistance-program> (if you are a current employee) and additional support from Mortgage Choice (such as counselling or other support services)]; and/or
- rectifying any detriment that you have suffered.

No person may cause detriment to someone else (or threaten to do so) because of a belief that person has or will make a Whistleblower Report. Examples of detriment include discrimination, harassment, causing physical or psychological harm, damaging property, and varying an employee's role or duties.

Any person involved in causing detrimental conduct will be subject to disciplinary action. In some circumstances, this may also be a criminal offence punishable by imprisonment.

If a Whistleblower believes that they have been subjected to detrimental conduct as a result of making a Whistleblower Report they should discuss this with the General Manager, Human Resources who will be responsible for undertaking an immediate investigation of the grievance.

Mortgage Choice will look for ways to support all people who make a Whistleblower Report, but it will not be able to provide non-employees with the same type and level of support that it provides to employees. In all cases, Mortgage Choice will seek to offer as much support as practicable.

Further information regarding the protections afforded under Australian law to persons who speak up is available at Attachment 1 to this Policy.

3.5 Reporting of Whistleblower Reports

The ARC will receive a summary of reports made under the Policy on a quarterly basis. The ARC will be provided additional information about any material incidents raised.

4. Breach Of This Policy

Breach of this Policy may be regarded as misconduct, which may lead to disciplinary action (including termination of employment or engagement). In addition, an individual may also be exposed to criminal or civil liability for a breach of the Corporations Act.

5. Implementation of the Whistleblower Policy

This Policy was approved by the Board on 20 November 2019 and will commence operative effect from 1 January 2020.

A copy of this Policy will be published externally on Mortgage Choice's website and internally on its intranet. Copies of this Policy will be provided to each Mortgage Choice employee immediately prior to the Policy commencing operative effect and to future directors, company secretaries and employees of Mortgage Choice at the time of their commencement with Mortgage Choice.

This Policy will be reviewed by the ARC on an annual basis. The ARC will, as appropriate, make any recommendations for amendment of this Policy to the Mortgage Choice Board for approval.

This Policy does not form part of terms of employment and may be amended from time to time.

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ATTACHMENT 1

Information On Protections Provided By Law

1. Additional Legislative Protections

Mortgage Choice encourages speaking up under this Policy. However, the law offers protections in other cases (for example, you can report potential misconduct to people other than the Whistleblower Officers).

If you make a “protected disclosure” under the law that does not comply with this Policy, you will still be entitled to the legal protections outlined in this Attachment.

Please contact the General Counsel and Company Secretary if you would like more information about legal protections.

2. Protected Disclosures

Certain information that is disclosed to certain people or organisations is protected by law. Examples of this information and recipients are outlined in the following table.

Information reported or disclosed	Recipient of disclosed information
<ul style="list-style-type: none"> Information about actual or suspected misconduct, or an improper state of affairs or circumstances in relation to Mortgage Choice or a related body corporate This includes information that Mortgage Choice or any officer or employee of Mortgage Choice or a related body corporate has engaged in conduct that: <ul style="list-style-type: none"> contravenes or constitutes an offence against certain legislation (e.g. the Corporations Act); represents a danger to the public or the financial system; or constitutes an offence against any law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more Information about misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of Mortgage Choice or an associate, which the employee considers may assist the recipient to perform functions or duties in relation to the tax affairs of Mortgage Choice or an associate Information that may assist the Commissioner of Taxation to perform his or her functions or duties under a taxation law in relation to Mortgage Choice 	<ul style="list-style-type: none"> A person authorised by Mortgage Choice to receive protected disclosures – i.e. Whistleblower Officers under this Policy An officer or senior manager An auditor, or a member of an audit team conducting an audit, of Mortgage Choice or a related body corporate An actuary of Mortgage Choice or a related body corporate ASIC or APRA A legal practitioner for the purpose of obtaining legal advice or legal representation An auditor, or a member of an audit team conducting an audit, of Mortgage Choice or a related body corporate A registered tax agent or BAS agent who provides tax services or BAS services to Mortgage Choice or related body corporate A director, secretary or senior manager An employee or officer of Mortgage Choice or related body corporate who has functions or duties that relate to the tax affairs of Mortgage Choice or related body corporate Commissioner of Taxation

The law also protects certain disclosures made in “emergency” and “public interest” situations, in which case disclosures can be made to additional recipients following a special process under the law (including members of parliament and professional journalists).

Please contact the General Counsel and Company Secretary if you would like more information about emergency and public interest disclosures.

Personal work-related grievances

Legal protection for disclosures about solely personal employment related matters are only available under the law in limited circumstances. A disclosure of a personal work-related grievance will remain protected if, in summary:

- it concerns detriment to you because you have or may be considering making a Whistleblower Report; or
- it is made to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the law about whistleblowers.

Under the law, a grievance is not a ‘personal work related grievance’ if it:

- has significant implications for an entity regulated under the law that do not relate to the discloser;

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- concerns conduct, or alleged conduct, in contravention of specified corporate and financial services laws, or that constitutes an offence punishable by 12 months or more imprisonment under any other Commonwealth laws;
- concerns conduct that represents a danger to the public or financial system; or
- concerns conduct prescribed by the regulations.

3. Specific Protections And Remedies

Additional legislative protections may also be available, including but not limited to:

- compensation for loss, damage or injury suffered as a result of detrimental conduct;
- an injunction to prevent, stop or remedy the effects of the detrimental conduct;
- an order requiring an apology for engaging in the detrimental conduct;
- if the detrimental conduct wholly or partly resulted in the termination of an employee's employment, reinstatement of their position; and
- any other order the court thinks appropriate.

The law also states that a person who makes a protected disclosure:

- in some circumstances (e.g. if the disclosure has been made to a regulator) the information provided is not admissible in evidence against the person in criminal proceedings or in proceedings for the imposition of a penalty, other than proceedings in respect of the falsity of the information;
- will not be not subject to any civil, criminal or administrative liability for making the disclosure; and
- will have any contractual or other remedy enforced or exercised against on them the basis of the disclosure.