Mortgage Choice
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Whistleblower Policy

Effective July 2026

A statement about the Whistleblower Policy

Mortgage Choice (Mortgage Choice Pty Ltd & Smartline Operations Pty Ltd) and its related bodies corporate (Mortgage Choice) are committed to a culture of respect, integrity and honesty and to acting legally and ethically throughout our operations.

Staying true to our values is a key part of the way we work and we encourage all people involved with Mortgage Choice, including those with a work or supply relationship, to feel comfortable reporting any wrongdoing. Mortgage Choice acknowledges the importance of maintaining confidentiality and protecting anyone who reports wrongdoing from any detrimental action, such as intimidation or harassment.

Under this policy, Mortgage Choice is committed to:

- handling all reports confidentially and securely;
- undertaking necessary actions to safeguard the wellbeing of whistleblowers raising concerns regarding reportable conduct; and
- providing timely feedback to whistleblowers on the outcomes of their reports, where possible.

This policy applies to all of Mortgage Choice's operations in Australia.

This policy is accessible on the Mortgage Choice Help Centre and externally on Mortgage Choice's corporate website.

1. Scope and Purpose

What is the purpose of this policy?

The purpose of this policy is to encourage the reporting of any wrongdoing and ensure that any individual making a report of suspected misconduct can do so without fear of intimidation, reprisal or victimisation and with confidence that they will be protected and supported.

Who does this policy apply to?

An eligible whistleblower – a person who can make a disclosure that qualifies for protection in accordance with this policy - is any individual who is, or has been:

We may use your information for purposes including:

- a Mortgage Choice franchisee and their employees, consultants and contractors;
- a consultant to Mortgage Choice, or an employee of a consultant, that provides goods or services to Mortgage Choice;
- a contractor, or an employee of a contractor, that provides goods or services to Mortgage Choice;
- a sub-contractor, or an employee of any sub-contractor, to Mortgage Choice;
- a supplier, or an employee of any supplier, to Mortgage Choice;

- a business partner of Mortgage Choice, or an employee of a business partner of Mortgage Choice. This policy also applies to all relatives, dependents and spouses of the individuals listed above.
- the Corporations Act 2001 (Cth) (Corporations Act) provides specific protections to whistleblowers who disclose information concerning misconduct or an improper state of affairs or circumstances in relation to Mortgage Choice or a related body corporate. See Appendix 1 for detail about these protections; and
- the Taxation Administration Act 1953 (Cth) (Taxation Administration Act) provides specific protections to whistleblowers on tax related matters. See Appendix 2 for detail about these protections.

What is reportable conduct?

Disclosures which qualify for protection under the Corporations Act involve information that you have reasonable grounds to suspect concerns misconduct, or an improper state of affairs or circumstances in relation to Mortgage Choice. This includes where you have reasonable grounds to suspect that a person connected to Mortgage Choice has engaged in conduct (Reportable Conduct) that is

- illegal, or in breach of regulations;
- fraudulent or corrupt;
- unethical, including acting dishonestly or wilfully breaching Mortgage Choice's Code of Conduct Policy, or any other Mortgage Choice Policy;
- seriously harmful or has the potential to be seriously harmful, including deliberate unsafe work practices or disregard for standard operating procedures;
- a serious mismanagement of Mortgage Choice's resources;
- theft, or misappropriation;
- an abuse of authority;
- inconsistent with Mortgage Choice's values and/or behaviours (e.g. discrimination, bullying, sexual harassment, dishonest conduct, unsafe work practices); and/or
- a danger to the public or the financial system.

Disclosures that are not about Reportable Conduct do not quality for protection under the Corporations Act. However, the Reportable Conduct need not involve contravention of a particular law. For example, conduct that indicates a significant risk to public safety may be Reportable Conduct even though it does not involve a breach of a particular law.

If you are unsure whether the matter is Reportable Conduct, we recommend that you follow the processes in this policy to report the matter, to ensure that you have the whistleblower protections at law available if the matter is in fact Reportable Conduct. Mortgage Choice will treat all disclosures made under this policy in the same way whether they qualify for protection under the whistleblower laws or not. No action will be taken against a whistleblower if investigations show that the concerns have a reasonable basis, even if the matter does not in fact constitute Reportable Conduct. Note also that whistleblower protections may still apply even though a disclosure turns out to be incorrect.

It is important to be aware that reports which are found to be knowingly false, or of a trivial nature, could result in disciplinary action.

Exclusion of personal work-related grievances

Disclosures of personal work-related grievances are generally excluded from the scope of this policy and do not qualify for protection under the Corporations Act. These are grievances which relate to a current or former employee's employment or engagement that have implications for only that person and do not have broader implications for Mortgage Choice. For example:

- a conflict between you and a colleague or other Franchisee;
- a decision relating to a promotion application; or
- a decision to suspend or terminate your employment.

A personal work-related grievance may still qualify for protection under the whistleblower protections if:

- it 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 a personal work-related grievance (mixed report);
- you suffer from or are threatened with detriment for making a disclosure; or
- the disclosure suggests misconduct

2. See Something? Say Something

Who can you make a report to?

Mortgage Choice has several channels for making a report that qualifies for whistleblower protections if you become aware of any issue or behaviour which you consider to be Reportable Conduct:

Preferred channels	Contact methods
Anthony Waldron, CEO Financial Services & Mortgage Choice	anthony.waldron@mortgagechoice.com.au or face-to-face meeting
Lisa Connelly – REA Group Chief Risk Officer	lisa.connelly@rea-group.com or face-to-face meeting
Tamara Kayser – REA Group Chief Legal Officer and Company Secretary	tamara.kayser@rea-group.com or face-to-face meeting
Jennifer Lambert – REA Group Audit, Risk & Compliance Committee Chair	Via Deloitte Whistleblower Service* www.REAGroup.deloitte.com.au
Deloitte Whistleblower Service Australia* Phone Hotline	Australia: 1800 854 496 REA Group Whistleblower Service Reply paid 12628 A'Beckett Street Victoria 8006

*Mortgage Choice has engaged a third party, Deloitte Whistleblower Service Australia to host its whistleblower service. Deloitte Whistleblower Service Australia is not a related party to Mortgage Choice and will gather information independently and confidentially. Deloitte Whistleblower Service Australia will gather as much information as it can from you and will then provide a report to the REA Group Chief Risk Officer and Audit, Risk & Compliance Committee Chair (each an REA Officer). Reports may be made to Deloitte Whistleblower Service Australia anonymously, but if you elect to provide your contact details to Deloitte Whistleblower Service Australia, those contact details will only be provided to an REA Officer if you consent.

Can I make a report to anyone else?

Under the Corporations Act (or the Taxation Administration Act, as applicable) disclosures to the following people will also enable you to qualify for whistleblower protection:

- a director or company secretary of REA Group or a related body corporate;
- legal practitioners, where the disclosure is made for the purpose of obtaining legal advice or representation in relation to the whistleblower protection provisions. Please note that REA's in-house lawyers act for REA/Mortgage Choice and will not be in a position to provide independent legal advice to an individual reporting Reportable Conduct pursuant to this policy;
- an internal or external auditor (including a member of an audit team conducting an audit) or actuary of REA;
- if the report relates to tax matters, any employee or officer of REA who has functions or duties that relate to the tax affairs of REA;
- regulatory bodies and other external parties (such as ASIC or the ATO in the context of the Taxation Administration Act); and
- journalists and members of Commonwealth, state or territory parliaments (in very specific circumstances, see Appendix 1 for more information).

Is it OK to let my Franchisee, my Franchise Development Manager, State Manager or a colleague know?

It is important to be aware that disclosure to any third party may result in you losing the protections available to you as a whistleblower under the legislation. To ensure that you retain the relevant protections, a whistleblower report must be reported to one of the parties identified above.

Can I make a report anonymously?

You may choose to make a whistleblower report anonymously and you will still be protected by the Corporations Act. Information disclosed by you that may lead to your identification will only be disclosed if it is reasonably necessary for us to investigate the disclosure.

If you report anonymously:

- we are required to take all reasonable steps to reduce the risk that you will be identified;
- you can refuse to answer any questions that you feel may reveal your identity. We suggest that if you want to report anonymously that you keep a two-way conversation open with us so that we can ask any follow up questions and provide feedback, otherwise anonymity may affect our ability to investigate the matter effectively and communicate with you about outcomes of the investigation; and
- we will communicate with you through anonymous telephone hotlines or anonymised email addresses, or you may wish to use a pseudonym for the purpose of your disclosure.

Who can I contact to obtain additional information before deciding whether to make a formal disclosure?

If you would like additional information about the whistleblowing process before making a formal disclosure, you can contact REA's Chief Risk Officer, Chief Legal Officer or an independent legal adviser.

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3. We have your back

Mortgage Choice will protect you

Identity protection (confidentiality)

Keeping things confidential and protecting whistleblowers is important to us. Mortgage Choice will take all reasonable and legal steps to protect the identity of a whistleblower.

Subject to compliance with legal requirements, upon receiving a report under this policy, Mortgage Choice will only share your identity as a whistleblower or information likely to reveal your identity if:

- you have consented to the disclosure; or
- the disclosure is reported to a regulator such as ASIC, the Australian Federal Police or to further a criminal investigation; or
- the disclosure is referred to an external lawyer for the purpose of obtaining legal advice or representation about the whistleblower provisions in the Corporations Act.

Mortgage Choice can disclose the information contained in a disclosure with or without your consent if:

- the information does not include your identity;
- Mortgage Choice has taken all reasonable steps to reduce the risk that you will be identified from the information; and
- it is reasonably necessary for investigating the issues raised in the disclosure.

It is illegal for a person to identify you or disclose information that is likely to lead to your identification, except in the circumstances outlined above. If you believe there has been a breach of confidentiality, you may lodge a complaint through any of the authorised channels identified above or lodge a complaint with a regulator, such as ASIC or the ATO, for investigation.

Protection from detrimental acts or omissions

Mortgage Choice is committed to protecting you from any detriment arising from the filing of a report under this policy. The actions taken to protect you will depend on the circumstances surrounding your report. Detrimental conduct includes dismissal, demotion, harassment or intimidation, discrimination, harm or injury, including psychological harm, disciplinary action, bias, threats or other unfavourable treatment connected with making a report.

Detrimental conduct does not include administrative action that is reasonable for the purpose of protecting you from detriment or managing your unsatisfactory conduct in line with Mortgage Choice's policies.

If you believe you have experienced detriment following the filing of a report under this policy you should first raise this matter with the CEO, Financial Services and Mortgage Choice or REA's Chief Risk Officer. If you do not believe the issue has been resolved in a satisfactory manner, you may wish to speak with the Chair of the REA Group Audit, Risk & Compliance Committee. You may also seek independent legal advice or contact regulatory bodies, such as ASIC, or the ATO if you believe you have suffered detriment.

Any detriment suffered by you in reprisal for the filing of a whistleblower report or for the content of a whistleblower report will be treated extremely seriously, investigated and may result in disciplinary action or dismissal of the individual perpetrating the detrimental conduct.

For information regarding the legal protections under the Corporations Act that are available to disclosers who qualify for protection as a whistleblower, please refer to Appendix 1.

How will we investigate a whistleblower report?

The action and the time taken by Mortgage Choice in response to a report of concern under this policy will depend on the nature of the concern. Mortgage Choice will consider reports in a timely, thorough, confidential, objective and fair manner and as is reasonable and appropriate having regard to the law, the nature of the Reportable Conduct and all of the circumstances.

Mortgage Choice will consider all whistleblower reports and determine whether:

- the matter qualifies for protection under the whistleblower laws; and
- if a formal, in-depth investigation is warranted and the form it should take.

Where Mortgage Choice considers that a formal investigation is warranted, to the extent it is able to, Mortgage Choice will keep you regularly informed of the outcomes of the investigation, subject to considerations of law, privacy and confidentiality (including for those who are the subject of the report). Illegal or criminal activities may result in police involvement.

Prior to the commencement of an investigation, the REA Group Chief Risk Officer or the REA Group Audit, Risk and Compliance Committee Chair may seek legal advice from a member of the REA legal team or REA's external lawyers. The legal team will determine the applicable process where the investigation is to be undertaken for the sole or dominant purpose of providing legal advice to REA.

The investigator may be internal or external to REA and will be appointed by the REA Group Chief Risk Officer, the Chief Legal Officer or the REA Group Audit, Risk and Compliance Committee Chair. The Investigator will have appropriate experience to carry out the role, at the discretion of the appointing officer.

An internal investigator will be independent of line management in the area of the whistleblowing report and whistleblower. The method for documenting and reporting the findings of an investigation will depend on the nature of the disclosure. There may also be circumstances where it may not be appropriate to provide details of the outcome to the discloser.

The investigator's role is to examine the substance of the report:

- fairly and objectively;
- in line with any applicable established investigation protocols; and
- independently of the whistleblower, the applicable area of Mortgage Choice operations and the subject of the report.

Mortgage Choice is committed to ensuring the fair treatment of its employees and franchisees who are mentioned in a disclosure that qualifies for protection, including those who are the subject of a disclosure. If you are the subject of a disclosure, Mortgage Choice will ensure fair treatment by:

- advising you about the subject matter of the disclosure as and when required by principles of natural justice and procedural fairness and prior to any action being taken, giving you notice of relevant matters and a chance to respond;

- maintaining, as far as possible, the confidentiality of the report; and
- making available REA Group's Employee Assistance Program via The Hub

Where an investigation verifies any wrongdoing, Mortgage Choice is committed to rectifying this, including taking disciplinary action as necessary.

How will the investigation findings be handled?

Findings from an investigation and details of the actions taken shall be provided to the REA Group Audit, Risk & Compliance Committee, while preserving confidentiality. Feedback on the outcomes or progress of the investigation will also be provided to the whistleblower if and where appropriate, depending on the nature of the disclosure. There may be circumstances where it may not be appropriate to provide details of the outcome to the discloser.

Document Administration

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2.0	July 2025	Bernice Chan	Annual Policy Review and Refresh
3.0	July 2026	Bernice Chan	Annual Policy Review and Refresh

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Appendix 1 – Confidentiality and legal protections for disclosers under the Corporations Act

Whistleblowers should be aware that when a report is investigated it may become necessary to disclose details of the report to other personnel involved in the investigation and that through the investigation, elements of the reported conduct may become obvious to the subject(s) of the report. Throughout the process, Mortgage Choice will work closely with the whistleblower to protect their identity, however in a case where the subject may be able to determine who has provided information, immediate action will be taken to protect the whistleblower from any detrimental actions.

We will protect the confidentiality of a whistleblower's identity. This may include redacting personal information, referring to the whistleblower in a gender-neutral context and restricting the number of people who will know the discloser's identity.

The Corporations Act gives special protection to disclosures about any misconduct or improper state of affairs relating to Mortgage Choice if certain conditions are met:

- the whistleblower falls within the scope defined in section 1 of the policy;
- the report is made to an 'eligible recipient', which includes:
    - to the Deloitte Whistleblower Service Australia hotline;
    - an officer or senior manager of the group company concerned, namely the CEO, Financial Services;
    - the Audit, Risk and Compliance Committee Chair;
    - REA's external auditor;
    - a person authorised by REA to receive disclosures (for example the REA Group Chief Risk Officer or the external whistleblowing hotline);
    - ASIC; or
    - legal practitioners, where the disclosure is made for the purpose of obtaining legal advice or representation in relation to the whistleblower provisions in the Corporations Act even if the advice is to the effect that the disclosure does not relate to a 'disclosable matter'.
- the whistleblower has reasonable grounds to suspect that there has been misconduct, or an improper state of affairs in relation to Mortgage Choice or an REA Group company.

There are also some limited circumstances where a whistleblower is entitled to make a "public interest disclosure" or "emergency disclosure" to a journalist or member of State or Federal Parliament and qualify for protection. It is important for a discloser to understand the criteria for making a public interest or emergency disclosure. A disclosure must have previously been made to ASIC and written notice provided to the body to which the disclosure was made. In the case of a public interest disclosure, at least 90 days must have passed since the previous disclosure. A discloser should seek independent legal advice before making a public interest disclosure or an emergency disclosure.

The protections given by the Corporations Act when these conditions are met are:

- the whistleblower cannot be subject to civil, criminal and administrative liability for making the report (although a whistleblower can be subject to civil or criminal action if the whistleblower's report contains admissions of their own conduct);
- anyone who victimises or threatens the whistleblower is guilty of an offence and may be liable for damages;

- the whistleblower's identity will be kept confidential, and not disclosed to any other person without the whistleblower's consent (except any disclosures required to obtain legal advice or for the purpose of escalating or investigating the whistleblower's report (e.g. disclosures to ASIC or the Australian Federal Police);
- the person receiving the report commits an offence if they disclose the substance of the report or the whistleblower's identity, without the whistleblower's consent, to anyone except ASIC, the Australian Federal Police, or as otherwise specifically authorised by law; and
- a whistleblower may seek compensation or other remedies through the courts if they suffer loss, damage or injury because of a disclosure and the entity failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct. Disclosers should seek independent legal advice in relation to such matters.

It is important to note that these protections do not grant you immunity in respect of any misconduct by you which you reveal as part of your disclosure.

Mortgage Choice is committed to full compliance with these protective provisions.

Appendix 2 Special Protections under the Taxation Administration Act

For information about the protections provided in the tax whistleblower regime under the Taxation Administration Act, please refer to the webpage of the Australian Taxation Office (ATO) on tax whistleblowers:

https://www.ato.gov.au/general/gen/whistleblowers/.