



Policy Number G.90

Version 1.8

# Whistleblower Policy

Effective Date: 11 November 2020

Policy Owner: Chief Risk Officer

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# 1. Policy Intent

Cash Converters International Limited (the company) is committed to the highest standards of conduct and ethical behaviour in all our business activities, and to promoting and supporting a culture of honest and ethical behaviour, corporate compliance and good corporate governance.

The Board of Directors and Leadership Team recognises that any genuine commitment to detecting and preventing illegal and other undesirable conduct must include a mechanism whereby employees and others can report their concerns freely and without fear of reprisal or intimidation.

The Whistleblower Policy provides such a mechanism and encourages the reporting of such conduct. Unethical, unlawful or undesirable conduct is referred to in this Policy as “**Reportable Conduct**”.

# 2. Scope of the Policy

The policy applies to Cash Converters International Limited and Wholly owned operating subsidiaries officer, employee, contractor, supplier, tenderer, or any other person who has business dealing with the company.

# 3. Definitions

For the purposes of this Policy, the definitions are as listed below:

**Investigation:** A search of evidence connecting or tending to connect a person (either a natural person or a body corporate) with conduct that infringes the criminal law, or the policies and standards set by the company.

**Whistleblower:** Any company employee, director, contractor or consultant who, whether anonymously or not, makes, attempts to make or wishes to make a report in connection with Misconduct and where the whistleblower wishes to avail themselves of protection against reprisal for having made the report.

**Whistleblower Protection Officer (WPO):** A designated company representative tasked with the responsibility of protecting and safeguarding the interests of whistleblowers within the meaning of this Policy. The WPO will have access to independent financial, legal and operational advisers as required. The WPOs are Julie Bostock (Head of People and Culture) and Robert Hines (Chair of the Audit and Risk Committee).

**Whistleblower Investigations Officer (WIO):** A designated company representative tasked with the responsibility of conducting preliminary investigations into reports received from a whistleblower. The role of the WIO is to investigate the substance of the complaint to determine whether there is evidence in support of the matters raised or, alternatively, to refute the report made.

The WIO will be appointed by the WPO on a case by case basis, depending on the nature of the report. The WIO will be an independent party who is not associated with the area under investigation.

The WIO may be a manager as long as they are not implicated in the report. Other resources within the group or externally in need can be engaged including People & Culture, Loss Prevention or Internal Audit.

## 4. What is Reportable Conduct?

You make a report under this policy, if you believe (whether actual or suspected) that a company director, officer, employee, contractor, supplier, tenderer or any other person who has business dealing with the company has engaged in conduct ("**Reportable Conduct**") which:

- is dishonest, fraudulent, corrupt, or unlawful conduct or practices;
- is illegal activity (such as theft, drug sale or use, violence, harassment or intimidation, criminal damage to property or other breaches of state or federal law);
- is unethical or in breach of the company's policies (such as dishonestly altering company records or data, adopting questionable accounting practices or wilfully breaching the company's Code of Conduct or other policies or procedures);
- is potentially damaging to the company, company's employee or a third party, such as unsafe work practices, environmental damage, health risks or abuse of the company's property or resources;
- amounts to an abuse of authority;
- may cause financial loss to the Company or damage its reputation or be otherwise detrimental to the company's interests;
- involves harassment, discrimination, victimisation, or bullying; or
- involves any other kind of serious impropriety.

## 5. Who can I Report to?

Whistleblowers may wish to discuss the Reportable Conduct informally with their direct Line Manager or the responsible People and Performance Partner. A Manager or People and Performance Partner in receipt of the Reportable Conduct must report the matter to a WPO in accordance with the protocols regarding confidentiality set out in Section 7 below.

Where the Whistleblower does not feel comfortable reporting to their Manager or People and Performance Partner, where the Whistleblower has previously done so and believes no action has been taken, or the Whistleblower would prefer to avail themselves or an external reporting service, the Whistleblower may contact the PwC Whistleblower Service.

The PwC Whistleblower Service which is a free external hotline and reporting service independently monitored by PwC.

PwC reporting options are:

- by phone: 1800 945 228
- by email: [professional.standards@au.pwc.com](mailto:professional.standards@au.pwc.com)
- web-based portal access: <https://app.whispli.com/CCV>
- by post: Professional Standards Manager, GPO Box D198, Perth WA 6840

After receiving a disclosure, the external operator will provide the details of the disclosure to an appropriate WPO. Where a discloser provides their contact details to the external operator, those contact details will not be provided to the WPO without the discloser's consent.

A report may be submitted anonymously and remain protected under the Corporations Act if you do not wish to disclose your identity to a WPO or PwC.

## 6. Investigation of Reportable Conduct

The company will investigate all matters reported under this Policy as soon as possible after the matter has been reported. A WPO may appoint Whistleblower Investigation Officer (WIO), to assist in the investigation of a matter raised in a report. Where appropriate, the company will provide feedback to the whistleblower regarding the investigation's progress and/or outcome (subject to considerations of the privacy of those against whom allegations are made).

The investigation will be conducted in an objective and fair manner, and otherwise as is reasonable and appropriate having regard to the nature of the Reportable Conduct and the circumstances.

## 7. Protection of Whistleblowers

The Company is committed to ensuring confidentiality in respect of all matters raised under this policy, and that those who make a report in good faith are treated fairly and do not suffer any disadvantage.

### *(a) Protection of your identity and confidentiality*

Subject to compliance with legal requirements, upon receiving a report under this Policy, the company will not, nor will any supervisor, manager WPO or WIO, disclose any particulars that would suggest or reveal your identity as a whistleblower, without first obtaining your consent.

Any disclosure that you consent to will be disclosed on a strictly confidential basis. However, the WPO is able to disclose the complaint without your consent to ASIC or the Australian Federal Police.

### *(b) Protection of files and records*

All files and records created from an investigation will be retained under strict security and unauthorised release of information to someone not involved in the investigation (other than senior managers or directors who need to know to take appropriate action, or for corporate governance purposes) without your consent as a whistleblower will be a breach of this policy.

Whistleblowers are assured that a release of information in breach of this policy will be regarded as a serious matter and will be dealt with under the company's disciplinary procedures.

### *(c) Fairness*

An employee or contractor within the company's team who is subjected to detrimental treatment as a result of making a report in good faith under this policy should inform a senior supervisor within their division/business unit immediately. If the matter is not remedied, it should be raised in accordance with Section 5 of this policy.

Detrimental treatment includes dismissal, demotion, harassment, discrimination, disciplinary action, bias, threats or other unfavourable treatment connected with making a report.

The *Corporations Act 2001 (Cth)* also gives special protection to disclosures about breaches of that Act, as long as certain conditions are met – refer to **Annexure A** for further details.

## 8. Duties of Employees

It is expected that employees of the company who become aware of known, suspected, or potential cases of Reportable Conduct will make a report under this policy or under other applicable policies.

## 9. Reporting Procedures

WPOs will report to the Operational Risk and Compliance Committee on the number of and type of whistleblower incident report quarterly to enable the committee to address any issue at a divisional/business unit and or Group Level.

These reports will be made on a 'no names' basis, maintaining the confidentiality of matters raised under this policy.

The Audit and Risk Committee will receive copies of all divisional/business unit whistleblower reports, and whistleblower reports from WPO (as appropriate). In addition, serious and/or material Reportable Conduct will be considered by the WPO for immediate referral to the Chair of the Audit and Risk Committee.

## 10. Further Support

For policy queries contact your line Manager or the Chief Risk Officer.

For training and colleague support, contact your People and Performance Partner.

## 11. Policy Amendment

This policy cannot be amended without approval from the Audit and Risk Committee (ARC).

## 12. Document Change History

Effective 11 November 2020

## Annexure A – Special protections under the Corporations Act

The Corporations Act gives special protection to disclosures about potential breaches of the Corporations Act where the following conditions are satisfied:

- 1 the whistleblower is an officer or employee of the company, or a person or company who has a contract for the supply of goods and services with the company (a 'contractor') or an employee of such a contractor; and
- 2 the report is made to:
  - a Whistleblower Protection Officer;
  - a director, officer or senior manager of a Cash Converters International Limited company concerned;
  - Company's' external auditor (or a member of that audit team); or
  - the Australian Securities and Investments Commission (**ASIC**);
- 3 the whistleblower gives their name before making the report (i.e. the report is not anonymous); and
- 4 the report is made in good faith, and the whistleblower has reasonable grounds to suspect that there has, or may have, been a breach of the Corporations Act by a Group company or any of its officers or employees.

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

- the whistleblower cannot be subject to legal liability for making the report;
- anyone who victimises or threatens the whistleblower is guilty of an offence and may be liable for damages; and
- 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.

*\*Examples of conduct which may amount to a breach of the Corporations Act include:*

- *insider trading;*
- *insolvent trading;*
- *breach of the continuous disclosure rules;*
- *failure to keep accurate financial records;*
- *falsification of accounts;*
- *failure of a director or other officer of the company to act with the care and diligence that a reasonable person would exercise, or to act in good faith in the best interests of the corporation;*
- *failure of a director to give notice of any material personal interest in a matter relating to the affairs of the company.*