# WHISTLEBLOWER POLICY

**Date:** 14 October 2026

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# Contents


**1. Introduction ..... 3**

**2. Scope of the Policy ..... 3**

**3. Policy Intent and Purpose ..... 3**

**4. Key Whistleblower Roles ..... 4**

**5. Is my complaint protected under this Policy? ..... 5**

5.1 Who is an Eligible Whistleblower? ..... 5

5.2 Disclosable Matters - What is a Protected Disclosure? ..... 5

5.3 What is NOT a Protected Disclosure? ..... 6

5.4 Who can receive a disclosure? ..... 6

**6. How to make a disclosure ..... 7**

6.1 Disclosures to Cash Converters Eligible Recipients ..... 7

**7. What is the Investigation Process? ..... 8**

7.1 Key Steps in Managing a Whistleblower Disclosure ..... 8

7.2 How long will the Investigation Process Take? ..... 10

7.3 Fairness ..... 10

7.4 Communication with a Whistleblower ..... 10

**8. Protection and Support for Whistleblowers ..... 11**

8.1 What steps are taken to ensure a Whistleblower's confidentiality? ..... 11

8.2 What steps are taken to protect a whistleblower from detriment? ..... 12

8.3 How are complaints from Whistleblowers dealt with? ..... 13

**9. Duties of Employees ..... 13**

**10. Breaches of this Whistleblower Policy ..... 13**

**11. Reporting ..... 14**

**12. Accessibility ..... 14**

**13. Further Support ..... 14**

**14. Policy Amendment ..... 14**

**15. Document Change History ..... 14**

**Annexure A ..... 15**

**Annexure B ..... 18**

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# 1. Introduction

Cash Converters International Limited (**Cash Converters**) 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.

Cash Converters is required to implement a whistleblower policy in accordance with the *Corporations Act 2001* (Cth) and the *ASX Corporate Governance Principles and Recommendations*.

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 adverse repercussions and detriment including reprisal or intimidation.

This policy provides such a mechanism and encourages individuals to safely raise concerns about misconduct and improper practices.

# 2. Scope of the Policy

The policy applies to any current or former (each a **Relevant Person**) of Cash Converters or a related body corporate as set out below:

1. officers (managers and directors);
2. employees;
3. individuals who supply goods to Cash Converters (on a paid or unpaid basis) or employees of a supplier;
4. associates of Cash Converters;
5. relatives of any of the individuals in 1-4 above; and
6. dependents of any of the individuals in 1-4 above or of their spouse

This policy applies to Cash Converters and any related body corporate of Cash Converters.

# 3. Policy Intent and Purpose

The purpose of this policy is to set out Cash Converters whistleblower protection framework which aims to:

- encourage disclosure of information where the person has reasonable grounds to suspect that there is a contravention, misconduct, or an improper matter or circumstances in relation to Cash Converters or any related company of Cash Converters;
- to help Cash Converters deter wrongdoing;
- provide avenues for disclosure of such information without fear of adverse repercussions or detriment;
- set out the rights and protections that will be available to a Whistleblower, including the right to anonymity; and
- outline how Cash Converters will deal with a Whistleblower's disclosure to ensure it receives, handles and investigates the matter appropriately and on a timely basis.

## 4. Key Whistleblower Roles

| Key Role | Description | Responsible Person(s) |
|---|---|---|
| Whistleblower Protection Officer | The role of a Whistleblower Protection Officer is to:<br>• maintain the confidentiality and anonymity of the Whistleblower;<br>• protect the Whistleblower from adverse repercussions and detriment;<br>• appoint a Whistleblower Investigation Officer;<br>• keep in regular contact with the Whistleblower;<br>• provide updates and any findings of the investigation to the Whistleblower;<br>• review and consider any complaints made by the Whistleblower regarding the investigation or any adverse repercussions or detriment suffered because of their Whistleblower disclosure under this policy; and<br>• escalate any matter the Whistleblower Protection Officer considers appropriate and in accordance with Annexure B. | Cash Converters has appointed each of the following persons as a Whistleblower Protection Officer:<br>• Head of People and Culture<br>• Chair of the Audit and Risk Committee (Alternative Whistleblower Protection Officer)<br>or any other person that may be nominated by the Board from time to time. |
| Whistleblower Investigations Officer | This person may be an employee of Cash Converters or may be an external third party depending on the nature and complexity of the matter set out in the Whistleblower disclosure. | The Whistleblower Protection Officer will appoint a Whistleblower Investigations Officer to investigate the disclosure. This may be the Whistleblower Protection Officer, an internal expert (such as legal) or an external third party. |
| Whistleblower Executive Champion | A Whistleblower Executive Champion's role is to oversee the overall effectiveness of the Whistleblower Protection Framework and ensure it delivers on the objectives outlined in this policy. Through this oversight, Cash Converters seeks to ensure that the effectiveness of the Whistleblower Protection Framework is monitored (including as appropriate by independent assessments) and actions are taken to embed improvements where appropriate. | The Whistleblower Executive Champion is the Chief Risk Officer or their delegate. |

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# 5. Is my complaint protected under this Policy?

## 5.1 Who is an Eligible Whistleblower?

An individual is an Eligible Whistleblower (**Whistleblower**) and can take advantage of the protections set out in this policy, if they are:

- a **Relevant Person** (as defined in section 2 (*Scope*));
- make a **Protected Disclosure** (as defined in section 5.2 (*What is a Protected Disclosure*?)); and
- that disclosure is made to a person who is an **Eligible Recipient** (as defined in section 5.4 (*Who is an Eligible Recipient*?)).

There is no requirement for an individual to identify himself or herself in order for a disclosure to qualify for protection. The disclosure can be anonymous.

## 5.2 Disclosable Matters - What is a Protected Disclosure?

A disclosure is protected under this policy, if the Whistleblower has **reasonable grounds to believe** or suspect that the information disclosed concerns misconduct, an improper matter or circumstances which relate to Cash Converters or a related company of Cash Converters.

It is not the responsibility of a Whistleblower to prove the allegations which are the subject of a disclosure, but it is also important to ensure the information reported is, to the best of the Whistleblower's knowledge, true.

Deliberate false reporting of information which a person knows to be untrue will not be protected under this policy and is likely to amount to a breach of Cash Converters Code of Conduct. Deliberate false reporting could have serious consequences for the reputation of Cash Converters and the person involved in the disclosure.

Reporting false information **does not** include circumstances where a Whistleblower has reported information in good faith and which they believe to be true, but which is later determined to be unfounded as a result of an investigation performed by Cash Converters.

Examples of the types of disclosures which are protected under this policy include information regarding engagement in:

- dishonest behaviour *(for example, falsifying information in a report to management or the Board may be dishonest behaviour);*
- fraudulent, corrupt, or unlawful conduct or practices *(for example, money laundering or misappropriation of funds)*;
- offering or accepting a bribe;
- illegal activity (including theft, illicit drug sale or use, violence or property damage);
- contravention of legislation or an offence under any law;
- conduct that represents a danger to the public or the financial system; or
- engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made or be planning to make a disclosure.

Potential misconduct or an improper state of affairs does not need to involve a breach of law. A disclosable matter includes conduct that, although lawful, may be considered to be unethical, capable of causing harm, prohibited by Cash Converters Code of Conduct or systemic in nature.

## 5.3 What is NOT a Protected Disclosure?

**Personal work-related grievances** of a Relevant Person **generally are not covered by this policy** but are instead managed under the Grievance Policy. Personal work-related grievances include, but are not limited to, interpersonal conflicts, decisions relating to the engagement, transfer or promotion of the Relevant Person, decisions relating to the terms and conditions of engagement of the Relevant Person or a decision to discipline the Relevant Person.

However, a personal work-related grievance may qualify for protection under this policy where:

- the grievance relates to:
    - mixed reports, for instance where a concern regarding corporate misconduct or wrongdoing is accompanied by a personal work-related grievance, or a personal work-related grievance includes information about corporate misconduct or wrongdoing; or
    - a breach of employment or other laws punishable by imprisonment for a period of 12 months or more, relates to conduct that represents a danger to the public or relates to information that suggests misconduct beyond the discloser's own personal circumstances (i.e. the conduct is believed to be a systemic issue relating to Cash Converters culture); or
    - detriment suffered or threatened against a person in connection with a disclosure; or
- the discloser has obtained legal advice or legal representation about the operation of whistleblower protections and has been advised that the matter is a protected disclosure.

Protections are also provided in the tax whistleblower regime under the *Taxation Administration Act 1953*. If a person is unsure whether a particular matter falls within this policy, they can seek further guidance from the Whistleblower Protection Officer or seek their own independent legal advice.

## 5.4 Who can receive a disclosure?

Disclosures can be received by:

- an **Eligible Recipient**; and
- journalists and members of Commonwealth, state or territory parliament, under certain circumstances.

### *(a) Who is an Eligible Recipient?*

An 'Eligible Recipient' is a defined term under the applicable whistleblower protection laws. Disclosures by a Whistleblower will be protected under the law when the disclosures are made to an Eligible Recipient defined to include:

- a person authorised by Cash Converters to receive Whistleblower disclosures;
- a legal practitioner for the purposes of seeking legal advice;
- Cash Converters auditor or a member of Cash Converters audit team or of any related body corporate;
- a director, company secretary, other officer, actuary or senior manager of Cash Converters;
- APRA (refer to APRA Information on whistleblowing); or
- ASIC (refer to ASIC Information Sheet 239).

**Refer to section 6 for guidance on how to make a disclosure to an Eligible Recipient.**

**(b) Disclosures to Journalists or Parliament**

If a Whistleblower has previously made a disclosure to an Eligible Recipient, a further disclosure can be made to a journalist or member of the Parliament (Commonwealth, State or Territory) where:

- a Whistleblower is of the view on reasonable grounds that appropriate action is not being taken to address the matter and it is in the public interest to make a further public interest disclosure to an external party. Refer to **Annexure A** (Making a Public Interest Disclosure).
- a Whistleblower believes on reasonable grounds the matter poses substantial and imminent danger to the health or safety of one or more persons or to the natural environment and it is necessary to make a further emergency disclosure to an external party. Refer to **Annexure A** (Making an Emergency Disclosure).

# 6. How to make a disclosure

## 6.1 Disclosures to Cash Converters Eligible Recipients

Cash Converters encourages all individuals to raise concerns so that it can identify and address wrongdoing as early as possible. If the individual feels comfortable raising concerns within the usual business environment or with their direct manager, they should do so. However, if you wish to have the benefit of the whistleblower protection laws, you should report the information to an 'Eligible Recipient' which includes the reporting channels identified in the table below.

Cash Converters has implemented reporting channels that an individual can use. Usually, the best course of action will be to disclose a Whistleblower matter to the Whistleblower Protection Officer or through the Whistleblower Service.

An individual should choose an option which suits the individual's circumstances and level of comfort. Channels for Cash Converters Eligible Recipients including the Whistleblower Protection Officer and Whistleblower Service are:

| Reporting Channel | Description | Contact Details |
|---|---|---|
| Whistleblower Protection Officer | The Whistleblower Protection Officers are appointed by Cash Converters (refer to section 4 *(Whistleblower Protection Officers)*.<br><br>When submitting a Whistleblower disclosure in writing or by email, please ensure the subject line is marked with '**Confidential – Whistleblower Disclosure**' or advise the Whistleblower Protection Officer this is the purpose if reporting verbally. | **Julie Bostock**<br>Head of People and Culture<br>julie.bostock@cashconverters.com |
| Whistleblower Service | A disclosure to Cash Converters Whistleblowing Service which is currently managed by Employee Relations Strategies (ERS) Whistleblower Service. This is an independent company with experienced whistleblowing staff. | ERS reporting options are:<br>**Phone:** 1800 945 228 (during normal business hours (Sydney/Melbourne/Canberra time)<br>**Secure webform:** |

| | | |
|---|---|---|
| | | Cash Converters Whistleblower Online Disclosure Form - ER Strategies |
| Alternate Whistleblower Protection Officer | An Alternate Whistleblower Protection Officer has been appointed as specified in this Policy e.g. where the disclosure involves or relates to the Whistleblower Protection Officer or the Whistleblower Protection Officer is not independent or otherwise conflicted.<br><br>In circumstances where an Alternate Whistleblower Protection Officer has been appointed, references to Whistleblower Protection Officer in the Policy in relation to managing and investigating the particular disclosure will apply to the Alternate Whistleblower Protection Officer. | **Robert Hines**<br>Chair of Audit and Risk Committee<br>**Email:** Robert.Hines@cashconverters.com<br><br>When submitting a Whistleblower disclosure via the Company Secretary, ensure the disclosure is marked **"Confidential – Whistleblower Disclosure - to the attention of <Chair of the Audit and Risk Committee>"** |
| A director, company secretary, other officer, actuary, or senior manager of Cash Converters; and Cash Converters auditor or a member of Cash Converters' audit team or of any related body corporate | When submitting a Whistleblower disclosure in writing or by email, please ensure the subject line is marked with '**Confidential – Whistleblower Disclosure**' or advise the Whistleblower Protection Officer this is the purpose if reporting verbally. | Via Company Secretary<br>**Email:** companysecretary@cashconverters.com<br><br>When submitting a Whistleblower disclosure via the Company Secretary, ensure the disclosure is marked **"Confidential – Whistleblower Disclosure - to the attention of <the name of the *Director you are disclosing to*>"** |

See **Annexure A** for details on making a public interest and emergency disclosures.

# 7. What is the Investigation Process?

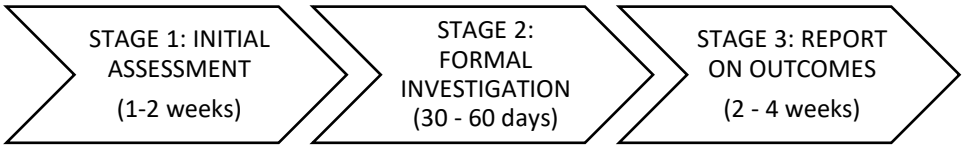
## 7.1 Key Steps in Managing a Whistleblower Disclosure

Generally, the Whistleblower Protection Officer is the primary person who manages assessment, investigation and reporting outcomes in a whistleblower disclosure matter. Sometimes, the disclosure will need to be escalated to a more senior person or an independent person. Escalation processes for Whistleblower disclosures are set out in **Annexure B (Independence and Escalations)**.

When a disclosure is received by an Eligible Recipient (including the Whistleblower Protection Officer), they will initially review the disclosure to determine the most appropriate course of action. As part of

this process the Eligible Recipient will also consider any immediate actions which might need to be taken to protect the Whistleblower, including confidentiality and any potential conflicts. If the person who receives the disclosure is not the Whistleblower Protection Officer, they will ask the Whistleblower for consent to refer the matter to the Whistleblower Protection Officer or, if applicable, escalate to a person nominated in Annexure B.

Investigation of a disclosure will consist of the following 3 key stages:




In summary:

**Stage 1 Initial Assessment**:

The Whistleblower Protection Officer is responsible for performing or arranging an Initial Assessment.

The Initial Assessment involves a preliminary assessment of the nature of the disclosure, issues raised and whether a formal investigation is needed. Some preliminary actions may be taken as part of the Initial Assessment to verify the matters raised or clarify the disclosure with the Whistleblower. In some instances, it may be assessed that an investigation is not required. In these instances, the Whistleblower Protection Officer may take actions to address the concerns raised or report back to the Whistleblower on the outcome of their Initial Assessment (refer to Stage 3).

**Stage 2 Formal Investigation**:

In circumstances where it is assessed by the Whistleblower Protection Officer that an investigation is necessary, the Whistleblower Protection Officer is responsible for performing or arranging for performance of the investigation. The investigation may involve seeking further information from the Whistleblower, reviewing the information provided, reviewing documentation and conducting interviews. The extent of the investigation will depend on the nature and complexity of matters raised. If the Whistleblower has made the disclosure on an anonymous basis it may not be possible to contact the Whistleblower for further information and so it is important to take this into account when making a disclosure.

**Stage 3 Report on Outcomes**:

Involves communicating to the Whistleblower the outcome of the disclosure. Communications with the Whistleblower will be approached applying principles of transparency and keeping the Whistleblower informed. There may be limitations in the level of detail which can be provided to a Whistleblower regarding specific actions taken for example, due to a duty of confidentiality owed to the company or another employee.

## 7.2 How long will the Investigation Process Take?

Timeframes provided in the diagram above are only intended as a guide. The stages and timeframes may vary depending on the nature of the disclosure. For example, if the disclosure involves a complex matter or a large number of people, the process may be conducted over a longer period of time. The Whistleblower Protection Officer will communicate anticipated timeframes with the Whistleblower throughout the investigation process (see section 7.4 (Communications with a Whistleblower)).

## 7.3 Fairness

Assessment of disclosures and, if applicable, investigation of a disclosure will be treated in a thorough, objective, fair and impartial manner by Cash Converters and the persons involved in the investigation. In particular, some of the actions taken to ensure this occurs include:

- ensuring that any persons involved in the initial assessment and investigation of the disclosure are **independent and impartial**, this includes the Whistleblower Protection Officer and any Eligible Recipient;
- as far as practicable, **confidential handling** of the disclosure and the identity of the Whistleblower and any persons involved in or related to the disclosure;
- all disclosures made under this Policy will at a minimum be subject to an **initial assessment**;
- the primary objective of an investigation will be to determine whether there is enough **evidence to confirm matters reported**; and
- an employee/employees involved in a disclosure will be informed about the subject matter of the disclosure, treated in accordance with applicable employment laws and principles of **natural justice and procedural fairness**. They will also be informed of the outcome in due course.

## 7.4 Communication with a Whistleblower

The Whistleblower Protection Officer (or where the matter has been escalated, the relevant person) will keep the Whistleblower informed of matters such as:

- the process that will be followed dealing with the disclosure;
- the appointment of a Whistleblower Investigation Officer;
- all relevant information relating to the investigation (subject to confidentiality obligations which apply to the affairs of Cash Converters or other individuals involved in the disclosure);
- protections available to the Whistleblower;
- expected timeframes; and

- to the extent it is possible, outcomes and any actions taken.

# 8. Protection and Support for Whistleblowers

Cash Converters will take steps to ensure fair treatment for all Whistleblowers that qualify for protection including:

- maintenance of the Whistleblower's confidentiality; and
- protection from suffering detriment.

It is the role of the Whistleblower Protection Officer to ensure that the Whistleblower is offered these protections. The Whistleblower will be contacted by the Whistleblower Protection Officer, as soon as practicable after making a disclosure, to discuss their welfare and any actions required to protect the Whistleblower.

A Whistleblower can seek compensation and other remedies through the courts for loss, damage or injury suffered by a Whistleblower. For example, a Whistleblower may be entitled to compensation or other remedies as a result of a breach of confidentiality or where Cash Converters has failed to prevent a person from causing detriment to the Whistleblower.

In addition to protections which must be implemented by Cash Converters to prevent loss, damage or injury suffered by a Whistleblower, a Whistleblower is also protected under the law from the following action being taken against them in relation to their disclosure:

- civil action (e.g. action taken against the Whistleblower for breach of employment contract, breach of confidentiality or breach other contractual obligations);
- criminal actions (e.g. action taken against the Whistleblower for unlawfully releasing information); and
- administrative liability protection (e.g. disciplinary action taken against the Whistleblower for making the disclosure such as performance management or dismissal).

The above protections at law do not grant immunity for any misconduct a Whistleblower themselves has engaged in which may be revealed in their disclosure or any fraudulent or false disclosure. A Whistleblower should seek independent legal advice if they require further advice or guidance on the protections available to them.

## 8.1 What steps are taken to ensure a Whistleblower's confidentiality?

Cash Converters is required under applicable Whistleblower laws to protect the confidentiality of a Whistleblower's identity. It is illegal to disclose the identity of a Whistleblower or information that is likely to lead to the identification of such a person.

Cash Converters will take all reasonable steps to protect the confidentiality of a Whistleblower. In particular, the identity and information that can lead to the identification of a Whistleblower will be safeguarded so that they can remain anonymous (if preferred) or strictly confidential.

A Whistleblower Protection Officer will only disclose the identity of the Whistleblower to other officers or employees of Cash Converters on a "needs to know" basis or where necessary to investigate the issues raised in the disclosure. Any disclosure of the identity of a Whistleblower is subject to strict confidentiality requirements. The Whistleblower's identity will also not be disclosed in Court or Tribunal proceedings, unless compelled or required by law.

Cash Converters protects a Whistleblower's confidentiality by:

- securely storing paper, electronic documents and other materials relating to the disclosure;
- restricting access to information relating to disclosure to only those persons necessary to undertake or assist with an investigation of the disclosure;
- ensuring communications (including emails) with the Whistleblower or relating to a disclosure are sent to authorised addresses and/or staff;
- limiting printing of documents relating to the disclosure to only where it is strictly required and ensuring that printed documentation can only be accessed by persons authorised under this policy; and
- ensuring that all parties involved in a disclosure are regularly reminded that they should keep the identity of the Whistleblower and the disclosure confidential.

## 8.2 What steps are taken to protect a whistleblower from detriment?

It is an offence under the whistleblower legislation for a person to cause detriment, or threaten to cause detriment, to a person who has made a disclosure as a Whistleblower or someone whom they suspect may make a disclosure. A threat can be express or implied, conditional or unconditional. The types of detriment which are covered by this prohibition include.

- termination of employment;
- performance management or disadvantageous alteration of duties;
- discrimination between the Whistleblower and other employees of Cash Converters;
- any harm or injury, including any psychological harm;
- damage to property or reputation;
- damage to a business or financial position;
- harassment or intimidation; or
- any other damage to a person.

A person who takes such action will be subject to potential civil and criminal liability in addition to Cash Converters internal disciplinary process. Cash Converters takes very seriously any adverse actions against, or threats to, Whistleblowers. However, actions taken by Cash Converters (such as administrative action or management) which are reasonable to protect the Whistleblower or other persons, is not detrimental conduct. Where action is taken to protect the Whistleblower, the Whistleblower Protection Officer will explain to the Whistleblower the reasons why such action has been taken.

Cash Converters takes reasonable precautions and steps to protect people who have or intend to make a disclosure under this policy from detriment by:

- making this policy easily accessible;
- appointing independent and impartial persons to perform duties in connection with this policy including the Whistleblower Protection Officer, the Whistleblower Investigations Officer and the Whistleblower Executive Champion;
- taking appropriate action to protect the Whistleblower from the risk of detriment in accordance with any assessed risks (for example, re-location of the Whistleblower to another office or role at the same level, reassigning or relocating other staff involved in the disclosure or other modifications to the Whistleblower's workplace or the way they perform their duties);

- maintaining the confidentiality of the Whistleblower's identity and information that could lead to the identification of the Whistleblower;
- implementing a secure record keeping system to hold information, documentation and communications relating to a Whistleblower Disclosure; and
- conducting training and awareness communications outlining (i) the importance of whistleblowing, (ii) Cash Converters support of those individuals who decide to make a Whistleblower disclosure and (iii) the consequences for breaching this policy to all staff but in particular management;

If a Whistleblower has suffered any detriment, they should report this to the Whistleblower Protection Officer as soon as possible. The Whistleblower Protection Officer will arrange for Cash Converters to provide all reasonable assistance and protection to prevent the Whistleblower from suffering any further detriment. Some of the actions which may be considered appropriate include but are not limited to:

- allowing the Whistleblower to take extended leave;
- developing an alternative career development plan; or
- offering other support or remedies such as counselling, advice or financial support.

### 8.3 How are complaints from Whistleblowers dealt with?

If a Whistleblower has any complaints or concerns about the manner in which an investigation is being handled, they can raise their concerns with the Whistleblower Protection Officer. The Whistleblower Protection Officer may escalate the complaint or concern with the investigation process to the Whistleblower Executive Champion.

Where the complaint or concern is about the Whistleblower Protection Officer or the manner in which the investigation process is being handled, the Whistleblower may address their complaints or concerns directly to the Whistleblower Executive Champion.

## 9. Duties of Employees

It is expected that employees of Cash Converters who become aware of known, suspected, or potential cases of reportable conduct will make a report under this policy or under other applicable policies.

## 10. Breaches of this Whistleblower Policy

Cash Converters is committed to:

a) ensuring the identity of a whistleblower remains confidential;
b) investigating disclosures made under this whistleblower policy; and
c) ensuring a whistleblower, or other person, is not subject to, or threatened with, detrimental conduct because a person believes a disclosure under this whistleblower policy has been made or could be made.

Any employee who breaches this whistleblower policy, including breaching an obligation to keep a whistleblower's identity confidential, refusing to participate or cooperate with an investigation into a

whistleblower disclosure, or engaging in detrimental conduct against a whistleblower or another person, may face disciplinary action.

## 11. Reporting

Cash Converters is committed to monitoring the effectiveness of this Whistleblower Policy and ensuring compliance with its legal obligations. The effectiveness of this policy and compliance with legal obligations will be monitored through periodic reporting to the Audit and Risk Committee on:

- the receipt, ongoing investigation and final outcome of whistleblower investigations (while maintaining the Whistleblower's confidentiality); and
- performance of the whistleblower protection framework

## 12. Accessibility

Cash Converters is committed to ensuring that all Relevant Persons have access to this policy and understand the types of reportable conduct, the whistleblowing process adopted by Cash Converters and the protections afforded under this policy.

In order to facilitate this goal:

- a copy of this policy and any supporting materials will be made available on CCLearn and publicly on Cash Converters website; and
- training will be provided at induction for new employees and officers and in an ongoing manner as part of refresher training for existing employees.

## 13. 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.

## 14. Policy Amendment

This policy will be reviewed at least every 2 years or more frequently as required due to the internal and external environment within which Cash Converters operates (including changes to regulatory requirements). All mandatory stakeholders will be consulted as part of the policy review process.

Changes arising from reviews and all other material changes to this policy must be reviewed by the Audit and Risk Committee and approved by the Board. Non-material changes to this policy may be approved by the Policy Owner when updating is required outside of any review cycle.

## 15. Document Change History

Update effective 14 October 2026.

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# Annexure A

## Making a Public Interest Disclosure

While Cash Converters encourages internal disclosure and investigation of issues at all times, a Whistleblower may be of the view that appropriate action is not being taken to address the matter. In these circumstances, a public interest disclosure may be made to an external third party but the view must be formed on reasonable grounds.

Protection under the law for a public interest disclosure will be available where:

a) the Whistleblower has previously made a disclosure through one of Cash Converters's reporting channels (**original disclosure**);

b) 90 days have passed since the original disclosure was made;

c) the Whistleblower does not reasonably believe that action is being, or has been, taken to address the matter set out in the original disclosure; and

d) the Whistleblower has reasonable grounds to believe that making a further disclosure of the information would be in the public interest;

e) after the 90 day period, the Whistleblower gave Cash Converters or other body to which the original disclosure was made, written notification that included sufficient information to identify the original disclosure together with the Whistleblower's stated intention to make a public interest disclosure;

f) the public interest disclosure is made to either a member of the Parliament of the Commonwealth, State or Territory or a journalist; and

g) the extent of the information disclosed in the public interest disclosure is no greater than is necessary to inform the recipient of the misconduct or improper state of affairs or circumstances referred to in the original disclosure.

Whistleblowers can also contact the Whistleblower Protection Officer or an independent legal adviser for further guidance on making a public interest disclosure if needed.

### Making an Emergency Disclosure

While Cash Converters encourages internal disclosure and investigation of issues at all times, a Whistleblower may be of the view appropriate action is not being taken by Cash Converters to address the matter and the matter poses **substantial and imminent danger to the health or safety of one or more persons or to the natural environment**. In these situations, an emergency disclosure may be made to an external third party.

Protection under the law for emergency disclosures will be available where:

a) the Whistleblower has previously made a disclosure through one of Cash Converters's reporting channels (**original disclosure**);

b) the Whistleblower has reasonable grounds to believe that the information concerns substantial and imminent danger to the health or safety of one or more persons or to the natural environment;

c) the Whistleblower gave Cash Converters or other body to which the original disclosure was made, written notification that included sufficient information to identify the

original disclosure together with the Whistleblower's stated intention to make an emergency disclosure;

d) the public interest disclosure is made to either a member of the Parliament of the Commonwealth, State or Territory or a journalist; and
e) the extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the recipient of the substantial and imminent danger.

Whistleblowers can also contact the Whistleblower Protection Officer or an independent legal adviser for further guidance on making an emergency disclosure if needed.

**Eligible Recipients - Public Interest Disclosure/Emergency Disclosure**

In addition, the following disclosures are also protected under the whistleblower legislation:

| Reporting Channel | Description | Contact Details |
|---|---|---|
| ASIC, APRA or a prescribed body | Whistleblowing legislation currently permits disclosures by an Eligible Whistleblower to ASIC and APRA.[1] | ASIC - https://asic.gov.au<br><br>See also ASIC Information Sheet 239<br><br>APRA - https://www.apra.gov.au/<br><br>See also APRA Information on whistleblowing |
| Other Eligible Recipients | If a Whistleblower makes a Public Interest Disclosure/Emergency Disclosure (whether for the purpose of reporting the issue or seeking advice) to any of the other Eligible Recipients listed in section 6.2 or 6.3, the disclosure will be protected. | Contact details will depend on the third party Eligible Recipient however, depending on the nature of the Eligible Recipient, may be available through internal contact information or publicly available information. Formal channels which been implemented by Cash Converters and relevant contact details are provided above. |

As noted above, all disclosures made under this policy are confidential and protected. If an individual would like to report the matter anonymously, they should choose the appropriate channel which best suits their circumstances in order to protect their identity. [*For instance, if the individual works in an open plan environment, they may submit a report by phone after hours or by sending anonymous correspondence to the mailing address provided above*.]

A Whistleblower can choose a pseudonym for the purposes of a disclosure and not use their actual name. A Whistleblower may also refuse to answer questions, if they feel that by answering the questions their true identity could be revealed. However, a Whistleblower is encouraged to continue

[1] No other bodies are currently prescribed.

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to maintain communications with Cash Converters as far as possible so follow up questions and feedback can be provided.

**Making Reports to Other Bodies**

There are some circumstances in which a Whistleblower may have an additional legal obligation to report the information disclosed to a statutory body or government department as well. In these circumstances, the Whistleblower Protection Officer will advise the Whistleblower of such obligations, and the Whistleblower should make sure that these obligations are complied with.

[1] No other bodies are currently prescribed.

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# Annexure B

This section is designed to assist a Whistleblower Protection Officer/Alternate Whistleblower Protection Officer in assessing independence and escalating a disclosure where appropriate.

**Independence and Escalation**

In circumstances where the disclosure has been made to an Eligible Recipient other than the Whistleblower Protection Officer (such as the CEO or a director), with consent of the Whistleblower, the matter should be referred to the Whistleblower Protection Officer/Alternate Whistleblower Protection Officer, as appropriate.

Upon receipt of a disclosure, the Whistleblower Protection Officer or any Eligible Recipient must:

a) immediately assess whether they themselves are sufficiently independent and not conflicted from managing the disclosure and consider any other potential conflicts which may arise in the investigations process; and

b) consider whether the disclosure should be escalated according to the escalation process set out in the Table below.

| Disclosure Concerning | Escalation |
|---|---|
| *Where the disclosure relates to employees (other than an Executive Manager, director or officer)* | Whistleblower Protection Officer |
| *Where the Whistleblower Protection Officer is not independent or otherwise conflicted (eg the matter involves or relates to the Whistleblower Protection Officer or member of their team)* | Alternate Whistleblower Protection Officer (Chair of the Audit and Risk Committee) |
| *Where the matter relates to an Executive Manager, director or officer* | Alternate Whistleblower Protection Officer (Chair of the Audit and Risk Committee) |
| *Where the Alternate Whistleblower Protection Officer is not independent or is conflicted* | Chair of the Board |