



Whistleblower Policy

Financial Hub Financial Services Pty Ltd
("Finhub Financial Services")

Company:	Financial Hub Financial Services Pty Ltd
ABN:	30 081 992 172
AFSL:	480851
Date Updated:	15 April 2024

Glossary

Term	Definition
Finhub Financial Services	Means Financial Hub Financial Services Pty Ltd (ABN 30 081 992 172)
APRA	Means the Australian Prudential Regulation Authority.
ASIC	Means the Australian Securities and Investments Commission.
The Board	Means the Finhub Financial Services Board of directors.
Bribery	is the offering, promising, giving, accepting, or soliciting of an advantage as an inducement for action which is illegal, unethical or a breach of trust. A bribe is an inducement or reward offered, promised, or provided in gain any commercial, contractual, regulatory, or personal advantage and can take the form of gifts, loans, fees, rewards, secret commissions or other advantages.
Business Day	Means any day that is not a public holiday or weekend in the State of Queensland.
Corporations Act	Means the <i>Corporations Act 2001</i> (Cth)
Corruption	Dishonest activities in which a director, officer, employee, authorised representative or contractor of Finhub Financial Services acts contrary to the interests of Finhub Financial Services and abuses his/her position of trust in order to achieve some personal gain or advantage for himself, herself, or for another person or entity. Commonly this includes bribery or blackmail through the withholding or providing of services in return for personal gain.
Eligible Recipient	Means any person that is: an officer or senior manager within Finhub Financial Services; an auditor, or member of an audit team conducting an audit within Finhub Financial Services; or a risk manager within Finhub Financial Services (for example, a member of the RACC).
Eligible Whistleblower	Means any person that makes a disclosure in accordance with this Policy and wishes to avail themselves of the protections set out in this policy, and who is, or has been, any of the following: an officer of Finhub Financial Services; an employee of Finhub Financial Services; an individual who supplies goods or services to Finhub Financial Services (whether paid or unpaid); an employee of a person that supplies goods or services to Finhub Financial Services (whether paid or unpaid); an individual who is an associate of Finhub Financial Services; or a relative or dependent of an individual referred to above, or a dependent of the individual's spouse.

RACC	<p>Means the Finhub Financial Services Risk, Audit and Compliance Committee.</p> <p>The RACC is responsible (among other things) for establishing and maintaining risk management to ensure Finhub Financial Services complies with the applicable laws, statutory obligations, and corporate policies (excluding those which are separately managed by another committee, e.g. financial services laws).</p>
Executive team	<p>Means a team of senior executives within Finhub Financial Services, as nominated from time to time.</p>
Fraud	<p>Means dishonestly obtaining a benefit, or causing a loss, by deception or other means. This may include theft of funds from Finhub Financial Services or its clients.</p>
Improper Conduct	<p>Means misconduct, or an improper state of affairs or circumstances in relation to Finhub Financial Services. This includes, but is not limited to, Fraud, dishonesty, Corruption and illegal acts or omissions.</p>
Protected Disclosure	<p>Means the disclosure of information by an Eligible Whistleblower to Finhub Financial Services (in accordance with this Policy), ASIC, APRA, an Eligible Recipient, or a legal practitioner if the discloser has reasonable grounds to suspect that the information: concerns Improper Conduct in relation to any member of Finhub Financial Services; or indicates that a member of Finhub Financial Services, or an officer or employee of a member of Finhub Financial Services, has engaged in conduct that constitutes an offence against, or a contravention of, a provision of any of the following:</p> <ul style="list-style-type: none"> the Corporations Act; the <i>Australian Securities and Investments Commission Act 2001</i> (Cth); the <i>Banking Act 1959</i> (Cth); the <i>Financial Sector (Collection of Data) Act 2001</i> (Cth); the <i>Insurance Act 1973</i> (Cth); the <i>Life Insurance Act 1995</i> (Cth); the <i>National Consumer Credit Protection Act 2009</i> (Cth); the <i>Superannuation Industry (Supervision) Act 1993</i> (Cth); an instrument made under any Act referred to above; <p>any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more; or represents a danger to the public or the financial system.</p>
Whistleblower Protection Officer (WPO)	<p>Means the Finhub Financial Services Chief Executive Officer (or equivalent position).</p> <p>The WPO is responsible for ensuring that Eligible Whistleblowers are afforded protection in accordance with this Policy and the Corporations Act.</p>
Whistleblower Investigation Committee (WIC)	<p>Means a committee comprising at all times of three members including: the WPO; the chair of the RACC; and one additional member selected by the two standing members on an investigation- by-investigation basis having regard to the nature of the disclosure. This member may or may not be an officer of Finhub Financial Services.</p>

Objectives

Finhub Financial Services is committed to a culture of corporate compliance and ethical behaviour. We have developed this Whistleblower Protection Policy (Policy) in accordance with section 1317AI of the Corporations Act.

This Policy details the type of protections that are afforded to Eligible Whistleblowers, as well as the steps that Finhub Financial Services will take to ensure that Eligible Whistleblowers do not suffer any detriment following a Protected Disclosure.

Throughout this Policy, Finhub Financial Services is referred to as 'we', 'us', 'our' or any variations.

Who Does This Policy Apply To?

This Policy applies to all Eligible Whistleblowers.

In addition to the protection for Eligible Whistleblowers under this Policy, we will also consider (on a case-by-case basis) disclosures that otherwise satisfy the definition of 'Protected Disclosure' in accordance with this Policy where those disclosures are made by members of the following groups that are not otherwise Eligible Whistleblowers:

- organisations external to Finhub Financial Services; and
- members of the public.

Laws, Regulations, and Industry Standards Relevant to this Policy

This Policy incorporates elements of the following laws, regulations, and industry standards, which include:

- Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 (Cth);
- The Corporations Act 2001 (Cth) & the Corporations Regulations;
- AS 8000 -2003 –Corporate governance – good governance principles; and
- AS 8004 -2003 –Whistleblower protection programs for entities.

Protections Available to Eligible Whistleblowers

We undertake to ensure that an Eligible Whistleblower under this Policy shall not be penalised, personally disadvantaged or suffer detriment because they have made a Protected Disclosure.

We will not subject an Eligible Whistleblower to any civil, criminal, or administrative liability in relation to a Protected Disclosure, nor will we enforce a contractual obligation in relation to the Protected Disclosure (for example, the confidentiality clause in an employment agreement).

In addition, the WPO shall liaise with relevant managers, employees, or officers of Finhub Financial Services to ensure that the Eligible Whistleblower is not subject to any of the following:

- dismissal;
- injury;
- alteration of the Eligible Whistleblower's position or duties to their disadvantage;
- discrimination between an employee (if relevant) and other employees of Finhub Financial Services;
- harassment or intimidation;
- harm, including psychological harm or bullying; and
- damage to the Eligible Whistleblower's property.

If an Eligible Whistleblower subsequently reports being disadvantaged for making a Protected Disclosure (as described above), that information will be assessed as a new disclosure and will be investigated as set out in this Policy.

Personal Work-Related Grievances

The WPO and chair of the RACC may determine that a disclosure made by an Eligible Whistleblower is not a Protected Disclosure, but a personal work-related grievance. In this instance, a WIC will not be convened, and the individual will not be entitled to the protections set out in this Policy. The disclosure will be passed to the Finhub Financial Services Head of Human Resources. The Finhub Financial Services Chief Executive Officer will handle the disclosure in accordance with relevant policies.

A disclosure will constitute a personal work-related grievance if it concerns a grievance about any matter in relation to the discloser's employment with Finhub Financial Services, or former employment, having implications for the discloser personally and does not have significant implications for Finhub Financial Services and does not otherwise fit the definition of a Protected Disclosure.

Before making a disclosure by email, through our online form, or to an Eligible Recipient, you should consider whether your disclosure is a personal work-related grievance.

How to Make a Protected Disclosure

An Eligible Whistleblower makes a disclosure by doing one of the following:

- sending an email to admin@finhubfs.com; or
- making a report to an Eligible Recipient.

In each instance, the disclosure will be shared with the WPO who together with the chair of the RACC will determine whether the disclosure is a Protected Disclosure. If the disclosure involves the chair of the RACC the disclosure will be referred to the Chairman of the Board of Directors. If the disclosure involves the WPO, the disclosure will be referred to the Corporate Counsel. If this is the case, subsequent references to the chair of the GARCC and the WPO should be read accordingly.

If the WPO and the chair of the GARCC determine that a disclosure is not a Protected Disclosure, they may determine that the disclosure is a personal work-related grievance. In this instance, the disclosure will be shared with the Finhub Financial Services Head of Human Resources.

The Human Resources department of Finhub Financial Services has existing procedures in place designed to deal with employee grievances.

How Finhub Financial Services Investigates Protected Disclosures

Once the WPO and chair of the RACC determine that a disclosure is a Protected Disclosure, a WIC will be convened to investigate the matter. The investigation shall be managed exclusively by the WIC.

The composition of the WIC will vary depending on the nature of the conduct to be investigated.

For each WIC convened, the WPO and the chair of the RACC shall select a third member, having regard to the particular disclosure. This may include a member of the Executive Team, head of a Finhub Financial Services business unit, their delegates, or someone external to Finhub Financial Services if that is determined appropriate in the circumstances.

Three (3) members of the WIC will be required to investigate any given matter.

The WIC will endeavour to notify the Eligible Whistleblower within 10 Business Days of being convened to update the Eligible Whistleblower of the proposed action.

WIC recommendations in any given matter must be based on a two-thirds majority vote by the appointed WIC members.

In certain cases, the WIC may decide there is a need to refer the relevant report to an appropriate external investigator. Such external investigator may include external lawyers and/or accountants or other specialist third parties as appropriate.

A matter will not be investigated by any person who is either implicated in the subject matter of the Whistleblower's report or who is known to have a direct influence over the person investigated.

Key Functions of the Whistleblower Investigation Committee

The key functions of a WIC investigation are to:

- collate information relating to the allegation as quickly as possible;
- consider the information collected;
- make a recommendation based on the evidence in a manner that is fair, objective and affords procedural fairness to all parties involved;
- make contemporaneous notes of all discussions, phone calls and tapes of all interviews with witnesses when conducting an investigation;
- use its best endeavours to ensure confidentiality, including, but not limited to, establishing a confidential filing system for storing all information it has received, conducting interviews in private and taking all reasonable steps to protect the identity of the Eligible Whistleblower; and
- warn the Eligible Whistleblower where disclosure of the identity of the Eligible Whistleblower cannot be avoided due to the nature of the allegations.

If the WIC exercises its discretion in favour of allowing a witness to have legal representation all associated costs will be the responsibility of the party engaging that representation.

At the conclusion of the investigation by the WIC, the WPO will prepare a report of the WIC's findings/recommendations. These findings/recommendations will be presented to the Board via the GARCC.

Where an investigation shows that wrongdoing has occurred within Finhub Financial Services, Finhub Financial Services is committed to changing its processes and taking action in relation to those Finhub Financial Services members who have behaved incorrectly.

Where illegal conduct may have occurred, this may involve reporting the matter to relevant authorities and, in some cases, to the police.

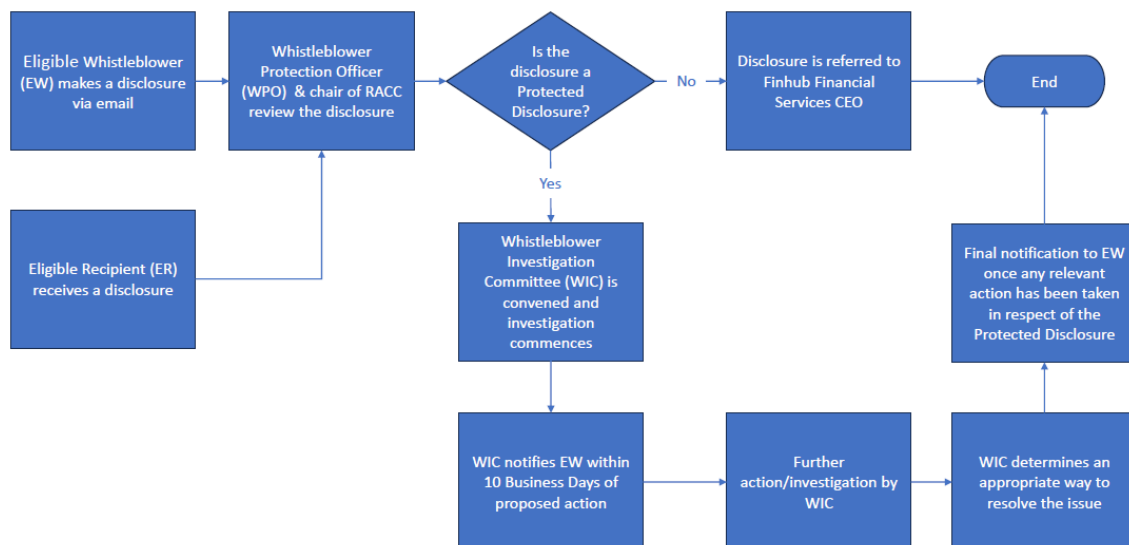
In some circumstances Finhub Financial Services may also be required to report instances of Improper Conduct to the relevant regulatory authorities, such as ASIC.

In addition, the WPO:

- Will examine the immediate welfare and protection needs of the relevant Eligible Whistleblower, if identified.
- Will also examine the immediate welfare of any Finhub Financial Services employees, officers or authorised representatives that are mentioned in a Protected Disclosure and take all necessary steps to ensure they are appropriately supported during and after an investigation.

Investigation Process

The below flow chart details, at a high level, the process that will be followed by the WIC during the investigation.



Whistleblowers Rights and Responsibilities

Eligible Whistleblowers must in all cases:

- when making a disclosure, not make a false disclosure knowing it to be false or being reckless about whether it is false; and
- assist with the investigation of the disclosure to the extent reasonably required.

The intentional making of a false disclosure is itself considered Improper Conduct which Finhub Financial Services has the right to act on. The making of any deliberately false or malicious allegations against Finhub Financial Services may result in disciplinary action up to and including dismissal.

Eligible Whistleblowers must not attempt to obtain evidence they have no right to access. Such improper access may itself be considered Improper Conduct. Eligible Whistleblowers are essentially 'reporting parties' and for this reason should not attempt to conduct their own investigative activities.

Whistleblowers making a Protected Disclosure should be prepared to set out all known information regarding any reported allegations and provide evidence in support of any such allegations. We may require Eligible Whistleblowers to complete forms from time to time during the initial report and subsequent investigation.

Where possible, and assuming the identity of the Eligible Whistleblower is known, the Eligible Whistleblower will be kept informed of the outcome of the investigation of their report, subject to privacy and confidentiality considerations.

Protection of an Eligible Whistleblower's identity will be maintained to the extent possible within the law.

The Corporations Act allows Finhub Financial Services to pass on the identity and information provided by an Eligible Whistleblower to ASIC, the Australian Prudential Regulation Authority, the Australian Federal Police, and legal practitioners without asking for permission from the Whistleblower.

The Corporations Act does not allow further disclosure of an Eligible Whistleblower's identity to be made without their consent.

The Eligible Whistleblower may, at any time during an investigation, contact Finhub Financial Services for a status update. Finhub Financial Services will use its best endeavours to provide the Eligible Whistleblower with a status update as soon as reasonably practicable.

Reporting

The RACC must report all material incidents under this policy or breaches of the policy to the Board.

Availability of policy

For officers and employees of Finhub Financial Services, this Policy is published on the secure staff portal. This Policy is also available on the Corporate Governance section of

the Finhub Financial Services website.

For More Information

If you would like more information on this Policy, please contact the Whistleblower Protection Officer by calling 1800 346 482 or emailing admin@finhubfs.com.