



Whistleblower Protection Policy

**COG Financial Services Limited (ACN 100 854 788) (the
“Company”) and its controlled entities (together, the “Group”)**

The purpose of this Policy is to set out how employees can report suspected instances of misconduct or serious wrongdoing and how those reports will be dealt with by COG Financial Services Limited (“COG”).

This Policy has been issued by the COG Board and applies to all staff.

This Policy is underpinned by the Company’s values.

1. COG COMMITMENT

COG is committed to the highest standards of conduct and ethical behaviour in all of its business activities and to promoting and supporting a culture of honest and ethical behaviour, corporate compliance and good corporate governance.

COG encourages the reporting of any instances of suspected unethical, illegal, fraudulent or undesirable conduct involving COG's businesses and provides protections and measures so that those persons who make a report may do so confidentially and without fear of intimidation, disadvantage or reprisal.

This Policy will be made available to officers and staff of the businesses with the COG corporate group (collectively referred to as “**the Business**” and each entity within the group as “**COG Entity**”) where “staff” includes employees, contractors and consultants. This Policy will apply across the Business and each COG Entity will adopt the Policy and make it available to officers and staff and any person wishing to read or use it.

Any person found in breach of the provisions in this Policy will be subject to disciplinary procedures, up to and including the termination of your employment or engagement with the Business.

2. WHAT IS REPORTABLE CONDUCT?

You may make a report under this Policy if you have reasonable grounds to suspect that a COG Entity director, officer, employee, contractor, supplier, tenderer or other person who has business dealings with the Business has engaged in conduct (“**Reportable Conduct**”) which:

- is dishonest, fraudulent or corrupt;
- is illegal activity (such as theft, violence, harassment or intimidation, criminal damage to property or other breaches of the law);
- is unethical or in breach of COG’s policies (such as dishonestly altering company records or data, adopting questionable accounting practices or wilfully breaching COG’s Code of Conduct or other policies or procedures of the Business);
- is potentially damaging to COG, a COG Entity employee or a third party, such as unsafe work practices, environmental damage, health risks or abuse of any COG Entity’s property or resources;
- amounts to an abuse of authority;
- may cause financial loss to COG or damage its reputation or be otherwise detrimental to COG’s interests;
- involves harassment, discrimination, victimisation or bullying, other than personal work-related grievances as defined in the *Corporations Act 2001* (Cth) (“**Corporations Act**”); or
- involves any other kind of misconduct or an improper state of affairs or circumstances.

This Policy does not apply to conduct that is not Reportable Conduct or conduct concerning a person’s current or former employment which does not have any significant implications for the Company although it may have personal implications for the person. Such conduct should be reported and handled in accordance with the Company’s usual procedures and policies regarding such matters.

3. WHO CAN I MAKE A REPORT TO?

COG has several channels for making a report if you become aware of any issue or behaviour which you consider to be Reportable Conduct:

For the purposes of this Policy to ensure appropriate escalation and timely investigation, we request that reports are made to COG's Compliance Officer in the first instance and Group Legal Counsel or the Chairperson of the Audit and Risk Committee if the Compliance Officer is not available for any reason (in each case, "**Protected Disclosure Officer**"). Email contact can be initiated by sending an email to compliance@coglimited.com.au. You may also raise the matter with an "officer" or "senior manager" of the Business.

4. YOU CAN REMAIN ANONYMOUS

COG respects and protects your identity if you choose to make an anonymous report. You can choose to remain anonymous while making a report, interacting with case managers during an investigation of your report, as well as after your case is closed. At any given time you can identify yourself, but this is your choice and at no point do you need to do this nor will you be forced to provide your identity. Any anonymous report should be in writing and addressed to the COG Compliance Officer, marked private and confidential and sent to COG's address at Level 1, 72 Archer Street, Chatswood NSW 2067.

5. COG'S INVESTIGATION OF REPORTABLE CONDUCT

COG will investigate all matters reported under this Policy as soon as practicable after the matter has been reported. A Protected Disclosure Officer may, with your consent, appoint a person to assist in the investigation of a report. Where appropriate, COG will provide feedback to you 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.

While the particular investigation process and enquiries adopted will be determined by the nature and substance of the report, in general, as soon as practicable upon receipt of the report, if the report is not anonymous, a Protected Disclosure Officer or investigator will contact you to discuss the investigation process including who may be contacted and such other matters as are relevant to the investigation.

Where a report is submitted anonymously, COG will conduct the investigation and its enquiries based on the information provided to it. The incident may, if necessary and at COG's discretion, be reported to the police or other relevant authorities. COG may pursue a prosecution against the relevant employee.

6. PROTECTION OF WHISTLEBLOWERS

COG is committed to ensuring confidentiality in respect of all matters raised under this Policy, and that those who make a report are treated fairly and do not suffer detriment.

(a) Protection against detrimental treatment

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

If you are subjected to detrimental treatment as a result of making a report under this Policy you should inform a Protected Disclosure Officer, officer or senior manager within your relevant COG Entity immediately.

(b) Protection of your identity and confidentiality

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

- (i) you consent;
- (ii) the concern is reported to the Australian Securities and Investments Commission ("**ASIC**"), the Australian Consumer and Competition Commission ("**ACCC**"), the Tax Commissioner or the Australian Federal Police ("**AFP**"); or

- (iii) the concern is raised with a lawyer for the purpose of obtaining legal advice or representation.

If COG needs to investigate a report, it may disclose information that could lead to your identification, but it will take reasonable steps to reduce this risk. Any disclosures of your identity or information likely to reveal your identity will be made on a strictly confidential basis.

(c) Protection of files and records

All files and records created from an investigation will be retained securely. 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 COG's disciplinary procedures.

The Corporations Act gives special protection to disclosures about breaches of that Act, provided certain conditions are met.

The *Taxation Administration Act 1953 (Cth)* ("**Taxation Administration Act**") also gives special protection to disclosures about breaches of any Australian tax law, provided certain conditions are met.

COG will ensure these special protections are respected as applicable.

(d) Post investigation

Following the investigation, the investigators will inform you of the results of the investigation and any corrective steps to be taken (unless complete anonymity has been requested).

You should write to the Chairperson of the Audit & Risk Management Committee if you believe:

- (i) You are being penalised in any way for reporting a suspected instance of misconduct or serious wrongdoing;
- (ii) There has been cover up of the suspected misconduct or serious wrongdoing; or
- (iii) You do not consider you have had a satisfactory response to your report.

This contact can be initiated by sending an email to armc.chair@coglimited.com.au

7. DUTIES IN RELATION TO REPORTABLE CONDUCT

It is expected that officers and staff of any COG Entity who become aware of actual, or suspect on reasonable grounds, potential cases of Reportable Conduct will make a report under this Policy or under other applicable policies of the Business.

All officers and staff of COG Entities:

- (a) are expected to demonstrate the highest standards of honesty at all times;
- (b) have a responsibility to protect the assets and reputation of the Business; and
- (c) are expected to be alert to the potential for misconduct and serious wrongdoing.

8. GROUP REPORTING PROCEDURES

Protected Disclosure Officers (as appropriate) will report to the COG Board on the number and type of whistleblower incident reports annually, to enable COG to address any issues at a COG Entity and/or Group level as appropriate.

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 whistleblower reports from Protected Disclosure Officers. In addition, serious and/or material Reportable Conduct will be considered by the Protected Disclosure Officers for immediate referral to the Chairman of the Audit and Risk Committee.

9. TRAINING

The Company will provide training to:

- (a) all staff about this policy and their rights and obligations under it; and
- (b) the Protected Disclosure Officers and manager who may receive whistleblower reports about how to respond to them.

10. AMENDMENT OF THIS POLICY

This Policy cannot be amended without approval of the COG Board. It will be reviewed from time to time to ensure that it remains effective and meets best practice standards and the needs of COG and the Business.

Policy History

Last review: 30 June 2021 (effective)

Review frequency As required