

## **WHISTLEBLOWER POLICY**

Issued date: 09 August 2021

### **PURPOSE**

Our Whistleblower Policy has been put in place to ensure employees can raise concerns regarding any serious wrongdoing (including unethical, illegal, corrupt or other inappropriate conduct) without being subject to victimisation, harassment or discriminatory treatment.

This Policy aims to:

- encourage employees to report an issue if they genuinely believe someone has engaged in serious wrongdoing;
- outline how Pureprofile will deal with all reports of serious wrongdoing; and
- set out the avenues available to employees to report serious wrongdoing.

### **WHO MUST COMPLY WITH THIS POLICY**

This Policy applies to Pureprofile Ltd and all its subsidiaries including all directors, officers and employees (including temporary or contract staff). Pureprofile expects that those who perform services for or on behalf of Pureprofile will comply with the law and apply the same or materially similar standards detailed in this Policy. This includes agents, contractors, consultants and advisors.

## **MATTERS THAT SHOULD BE REPORTED**

Any matter that an employee genuinely believes is in breach of Pureprofile's policies or the law should be reported in accordance with this Policy. Issues related to human resources and industrial relations are harassment, demotion, dismissal or prejudice, because they have made a report. However, this Policy will not protect the Whistleblower if they are also involved in or connected to the improper conduct or illegal activities that are being reported.

Reportable matters include any conduct that involves:

- dishonest behaviour;
- fraudulent activity;
- unlawful, corrupt or irregular use of company funds or practices;
- illegal activities (including theft, dealing in or use of illicit drugs, violence or threatened violence and criminal damage against property);
- unethical behaviour, including anything that would breach the Pureprofile Code of Conduct;
- improper or misleading accounting or financial reporting practices;
- a breach of any legislation relating to Pureprofile's operations or activities;
- behaviour that is oppressive, discriminatory or grossly negligent;
- an unsafe work-practice;
- any behaviour that poses a serious risk to the health and safety of any person at the workplace;
- a serious risk to public health, public safety or the environment; or
- any other conduct which may cause loss to Pureprofile or be otherwise detrimental to the interests of Pureprofile.

## **RESPONSIBILITY TO REPORT**

Pureprofile relies on its employees to help maintain and grow its culture of honest and ethical behavior. Pureprofile will not tolerate conduct that should be reported under this Policy. It is therefore expected that any employee who becomes aware of such conduct will make a report.

## **PROTECTION OF WHISTLEBLOWERS**

An employee making a report in good faith in accordance with this Policy (a “Whistleblower”) will not be discriminated against or disadvantaged in their employment or engagement with Pureprofile, even if the report is subsequently determined to be incorrect or not substantiated. All reasonable steps will be taken to ensure that a Whistleblower will not be subject to any form of victimisation, discrimination.

## **ANONYMOUS REPORTING**

A report can be made anonymously. However, it may be difficult for Pureprofile to properly investigate anonymous reports. If authorities take further legal action on the reported matter, it may become necessary for a Whistleblower to identify themselves.

If the Whistleblower wishes to benefit from statutory protections provided to whistleblowers (for example, under the Corporations Act 2001), they may also have to disclose their name. In these instances, Pureprofile will continue to ensure that the Whistleblower is protected from retaliation. Reporting in good faith a report may have serious consequences, including potential damage to the career prospects and reputation of people who are the subject of allegations of wrongdoing.

Therefore, it is very important that those who make a report under this Policy do so in good faith, with reasonable grounds for believing that the information is correct or likely to be correct. Pureprofile takes very seriously all reports made under this Policy and it looks particularly unfavorably on any false reports or claims.

Disciplinary action may be taken against any employee who makes a report that is not in good faith. A report will not be considered to be made in good faith if it is frivolous, raised for a malicious reason or ulterior motive, or if it is not based on facts and/or circumstances that provide a reasonable basis for the report. Repeated reports about trivial matters may also be considered not to be made in good faith.

## **RESOURCES**

The Board of Pureprofile Limited, through the Audit & Risk Committee, governs and is responsible for the ultimate decision-making power regarding reports and investigations

under this Policy.

Pureprofile has appointed a Whistleblower Protection Officer (WPO) who will safeguard the interests of employees making reports under this Policy and will ensure the integrity of the reporting mechanism. Reports under this Policy should be directed to the WPO, who will review the report, and refer any reports that require further investigation to the Whistleblower Investigation Officer. The WPO reports directly to the Chief Executive Officer (“CEO”) and the Audit & Risk Committee. The current WPO is the Company Secretary.

Pureprofile has also appointed a Whistleblower Investigations Officer who will carry out or supervise the investigation of reports made under this Policy. The current WIO is the Pureprofile Chief Operating Officer. The WPO and WIO act independently of each other and the responsibilities of these roles do not reside with one person.

## **MAKING A REPORT**

Employees may wish to first discuss the matter informally with their direct line manager or Talent and Culture manager in order to determine whether serious misconduct has occurred. This is an opportunity to clarify the incident, ask questions and determine whether the matter comes under this Policy. At all times, these discussions will remain confidential.

## **REPORTS CONCERNING THE CEO, WPO AND WIO**

If the report involves all three of the CEO, the WPO and the WIO, this will be directed to the Chairman of the Board.

## **INVESTIGATING A REPORT**

Where a report is made in good faith about a matter that comes under this Policy, the WIO will investigate the report. Where the WIO deems necessary, the WIO may use an external investigator to conduct an investigation, either in conjunction with the WIO or independently.

Where the WIO deems necessary, the WIO may also use an external expert to assist with

an investigation. All investigations will be conducted in a fair and independent manner and all reasonable efforts will be made to preserve confidentiality of an investigation. To avoid jeopardising an investigation, an employee who has made a report under this Policy is required to keep confidential the fact that a report has been made (subject to any legal requirements).

## **INVESTIGATION FEEDBACK**

Wherever possible, and assuming that the identity of the person making the report is known, the Whistleblower will be kept informed of the progress and outcomes of the investigation, subject to privacy and confidentiality considerations.

## **REPORTING TO OTHER BODIES**

In certain circumstances an employee may have a legal obligation to make a report to a statutory body or government department. Employees should ensure that they comply with all such reporting requirements. The WPO can advise employees on these reporting obligations.

## **BREACH OF THIS POLICY**

Any breach of this Policy will be taken seriously and may result in counselling and/or disciplinary action, up to and including summary dismissal.

## **GENERAL**

It is a condition of any employment or engagement by Pureprofile that all employees must comply at all times with this Policy. However, this Policy does not form part of any agreement between any person and any Pureprofile company, nor does it constitute terms and conditions of any person's employment or engagement with a Pureprofile company

## **AMENDMENT AND REVIEW**

This Policy will be reviewed every two years to ensure it remains consistent with all relevant legislative requirements, as well as the changing nature of the organisation. This Policy may be amended, withdrawn or replaced from time to time at the sole discretion of Pureprofile.