



Making a whistleblower report

This guide is to assist you when you wish to make a report about misconduct. For further information, please refer to the Group Whistleblower Policy.

What is a whistleblower report?

It is a report about a 'disclosable matter'. Only disclosure of information regarding a 'disclosable matter' qualifies for important legislative protections under the Corporations Act 2001.

What is a disclosable matter?

A disclosable matter is where a person has reasonable grounds to suspect that a situation involves misconduct, or an improper state of affairs, in relation to Insignia Financial. Reasonable grounds to suspect means that your motive for making the disclosure, or your personal opinion of the person(s) involved, does not prevent the legislative protections being applied to you.

What is misconduct?

Misconduct is an act or behaviour that is illegal or dishonest, or the concealment of an act or behaviour, of Insignia Financial, its officers or employees.

What is an improper state of affairs?

An improper state of affairs may not necessarily involve unlawful conduct but may indicate a systemic issue that may cause consumer harm, a significant risk to public safety or stability in the financial system.

How am I protected as an eligible whistleblower?

If you make a whistleblower report to an eligible recipient, you can access the whistleblower rights and protections. On receiving your report, the eligible recipient must ensure they:

- do not disclose your identity or information likely to lead to your identification without your consent, unless that disclosure is authorised by law, and
- do not cause or threaten to cause detriment or victimise you for making your report.

How can I make a report?

You can submit a whistleblower report in person, by telephone, online or in writing (including email). Your report must be made to an eligible recipient, who is a person to whom an eligible whistleblower may disclose their concerns.

In addition to our internal eligible recipients, you can also make your disclosure to Your Call, our external whistleblower service.

You are an eligible whistleblower if you are a current or former employee (permanent, part-time, fixed-term or temporary), intern, associate, director or officer of an Insignia Financial entity. Eligible whistleblowers also include a current or former:

- supplier of services or goods to Insignia Financial (whether paid or unpaid), or employee of a supplier or goods or services, such as a contractor, consultant, service provider, business partner or volunteer;
- officer, employee or supplier (or their employee) of a trustee, custodian or investment manager of an Insignia Financial superannuation entity; or
- spouse, relative or dependant of any of the individuals identified above.

Key eligible recipients

- Refer to the Group Whistleblower Policy for a complete list of eligible recipients.
- The Whistleblower Protection Officer (WPO), arranges or provides support and protection for the whistleblower, to support wellbeing and prevent or manage confidentiality breaches and victimisation.

Our current WPO is Mel Walls, Chief People Officer

 The Whistleblower Investigation Officer (WIO), investigates the whistleblower report and produces a report of investigation findings.

Our current WIO is Anvij Saxena, Chief Risk Officer

• The external whistleblower service, Your Call

Our external whistleblower service

You can make your report using our external whistleblowing service, which is independently managed by Your Call.

You can:

- make your report anonymously, or you can consent to sharing your identity
- securely upload relevant documents or material that you wish to provide
- remain in contact with Insignia Financial and receive updates about the handling of your report via the Your Call online message board, which allows you to remain anonymous if desired.

With your consent, your report will be provided by Your Call to Insignia Financial's nominated whistleblower officers to be managed consistently with the legislative requirements. If you choose to remain anonymous, Your Call will not provide your identity to Insignia Financial without your express consent.

Your Call will not investigate your matter; your matter will be investigated by Insignia Financial if you wish for it to be investigated.

Contact details



Online: 24/7

www.yourcall.com.au/insigniafinancial



Telephone: 1300 790 228

7am – midnight AEST, Business Days

What information do I need to make a whistleblower report?

We encourage whistleblowers to provide as much information as possible in their report, noting whistleblowers are not required to undertake their own investigation into the matter. Information that allows a report to be investigated efficiently includes:

- information about the person suspected of the matter
- · the nature of the suspected matter
- when the suspected matter was identified and how long it has been going on
- any evidence of the suspected matter and where other relevant evidence might be found
- · details of any witnesses to the suspected matter, and
- any concerns the whistleblower might have about reprisals.

What happens after I make a report?

If you choose to remain in contact with Insignia Financial and receive updates about the handling of your report (either directly or via the Your Call online message board), you will receive support and updates throughout the process from the nominated whistleblower officer handling your report.

Making and investigating whistleblower reports

Communicate Make a report Investigate Action outcomes Whistleblower WPO & WIO WPO/WIO notifies Refer actions makes a report to: (where relevant) to: assess if investigation the report outcome to: accountable • internal eligible qualifies as a Whistleblower executive recipient whistleblower report and Compliance team • Chair of the external determine Whistleblower **Group Audit** • People & if further Committee Officer Culture team investigation other external is required by relevant eligible recipient WIO or another external agencies investigator

WPO – Whistleblower Protection Officer

WIO - Whistleblower Investigation Officer