

# Whistleblower Policy



## Group Corporate

Review: Annually (next due June 2026 unless required earlier)

Document Owner: Chief Executive Officer

Classification: General Use

Approved:

Praemium Limited (PPS) July 2025

Praemium Australia Limited (PAL) August 2025

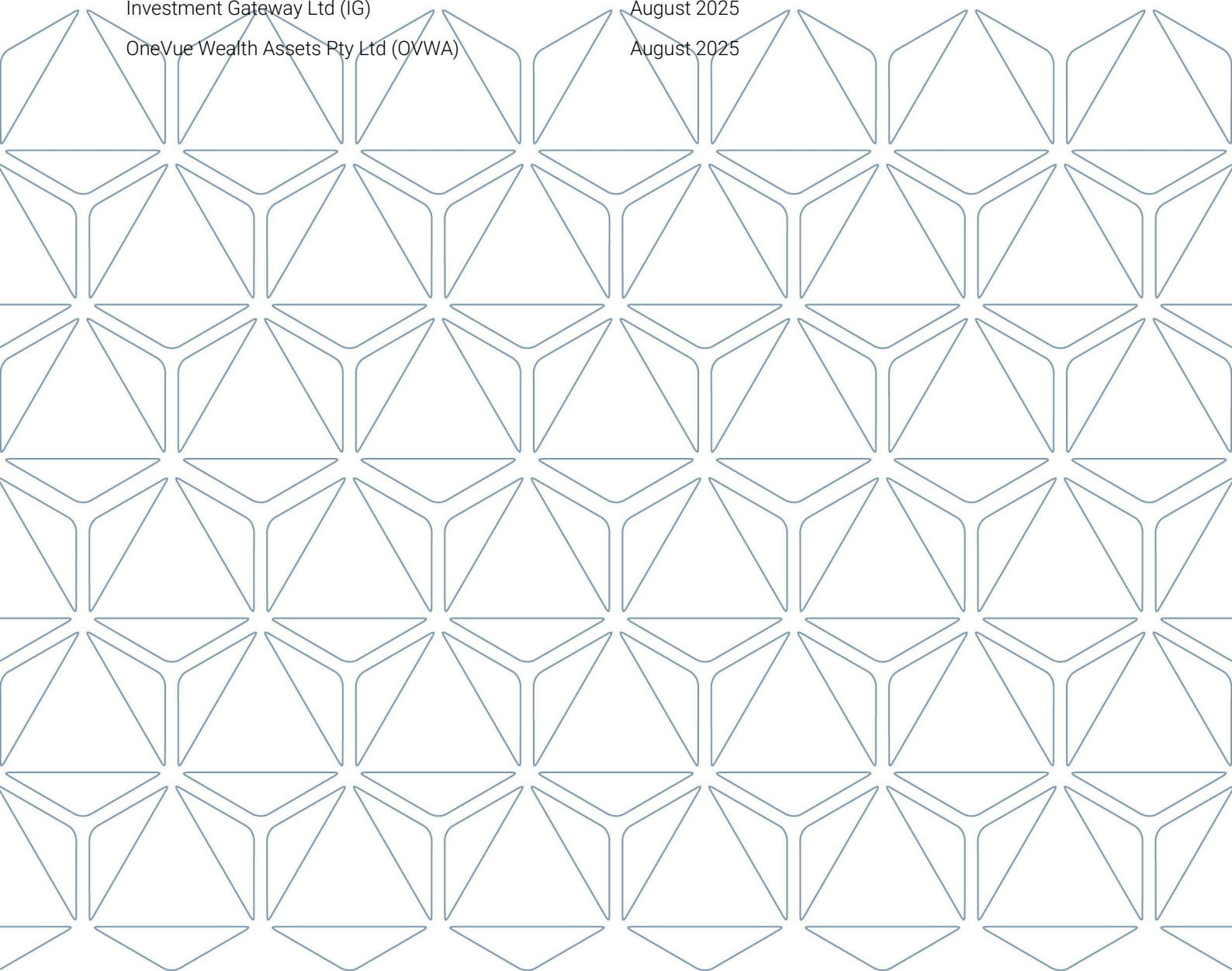
Powerwrap Limited (PWL) August 2025

MWH Capital Pty Ltd (MWH) August 2025

OneVue Wealth Services Pty Ltd (OVWS) August 2025

Investment Gateway Ltd (IG) August 2025

OneVue Wealth Assets Pty Ltd (OVWA) August 2025



# Contents

---

<b>About this document</b>	<b>3</b>
1. Background	3
2. Purpose	3
3. Non-compliance	3
4. Related Policies	4
5. Roles & Responsibilities	4
6. Definitions	5

---

<b>Making a Disclosure under this Policy</b>	<b>6</b>
7. Who Can Make a Disclosure under this Policy?	6
8. What Matters can be Disclosed under this Policy?	6
9. What Matters are excluded from being Disclosed under this Policy?	7
10. How to Make a Disclosure under this Policy	7
11. What Information Should be Included in a Disclosure?	7
12. Anonymous Disclosures	8
13. External Disclosures	8
14. Protections after Making a Disclosure	8

---

<b>Investigating a Disclosure under this Policy</b>	<b>9</b>
15. How Praemium Handles & Investigates Disclosures	9
15.1. Receiving a Disclosure	9
15.2. Initial Assessment of Disclosure	9
15.3. Investigating a Disclosure	9
15.4. Reporting	10
16. Support for Praemium Employees	10
17. Policy Accessibility	10

---

<b>Appendix 1 – Legal Protections</b>	<b>11</b>
18. Eligibility for Statutory Protection	11
19. Public Interest Disclosures and Emergency Disclosures	11
20. Identity Protection	12
21. Protection from Detrimental Conduct	13
22. Compensation and Other Remedies	14
23. Civil, Criminal and Administrative Liability Protection	14

---

<b>Appendix 2 – Eligible Recipients</b>	<b>15</b>
---	-----------

# About this document

---

## 1. Background

Praemium Limited (**Praemium**) is an ASX listed public company that has subsidiaries across Australia (collectively, **the Group, the Company**). The Group provides a number of products and services including financial software and technology, investment administration, financial products and investment platform administration.

Praemium encourages openness and transparency and is required to have an appropriate Whistleblower Policy (**this Policy**) under the *Corporations Act 2001* (Cth) (the **Act**), the *Tax Administration Act 1953* (Cth) and as an ASX-listed public company.

## 2. Purpose

Praemium is committed to the highest standards of corporate conduct and ethical behaviour and to promoting and supporting a culture of integrity, respect, compliance and governance.

Praemium recognises the important role whistleblowers play in identifying and reporting wrongdoing, misconduct and other unethical or illegal conduct. This Policy outlines the ways in which Praemium provides a safe, supportive and confidential environment for you to make a Disclosure. The Policy also outlines the process Praemium follows in receiving, handling and addressing wrongdoing which may otherwise go undetected.

The purpose of this Policy includes:

- » Creating a safe and secure environment to encourage you to disclose instances of wrongdoing without fear of reprisal;
- » Outlining how you can make a disclosure;
- » Providing transparent and clear mechanisms for reporting misconduct openly or anonymously;
- » Ensuring individuals who disclose wrongdoing can do so safely, securely and with confidence that their confidentiality will be safeguarded and that they will be protected and supported by Praemium;
- » Ensuring Disclosures are dealt with appropriately and on a timely basis;
- » Providing transparency around Praemium's framework for receiving, handling and investigating Disclosures;
- » Helping to deter wrongdoing; and
- » Demonstrating Praemium's compliance with relevant Australian regulations and laws in relation to whistleblowing including, but not limited to, the *Corporations Act 2001* (Cth),<sup>1</sup> the *Taxation Administration Act 1953* (Cth) and ASIC Regulatory Guide 270 Whistleblower Policies (RG 270).

## 3. Non-compliance

Any non-compliance with or a breach of this Policy will be taken seriously, and all matters will be investigated. In assessing non-compliance, each matter will be considered on a case-by-case basis according to its merits. Considerations may include the level of non-compliance, reasons for non-compliance (e.g., training), frequency and any other circumstances (e.g., other breaches of a reporting entities or professional standards).

Praemium does not provide legal or financial advice. If you are in doubt as to your rights under this Policy, please seek independent legal advice.

---

<sup>1</sup> Section 1317AI (5) of the Act. Whistleblower laws are found in Part 9.4AAA and section 1317AI of the Act.

## 4. Related Policies

This Policy should be read in conjunction with the following Company policies:

- » Our Ways of Working (Praemium's Code of Conduct)
- » Complaint Handling Policy
- » Grievance Procedure
- » Acceptable Workplace Behaviour Policy
- » Incident & Breach Management Policy

## 5. Roles & Responsibilities

Role	Responsibility
Board	<ul style="list-style-type: none"><li>» Approve the Policy.</li><li>» Ensure implementation of the Policy.</li><li>» Receive and discuss themes arising from Disclosures to ensure continuous improvement.</li></ul>
Audit, Risk and Compliance Committee (ARCC)	<ul style="list-style-type: none"><li>» Review and endorse the Policy to the Board for approval.</li><li>» Review final investigation reports and ensure that appropriate action has been taken and this Policy has been followed during the investigation.</li><li>» Monitor Praemium's compliance with its legal and regulatory obligations under this Policy.</li></ul>
Eligible Recipient	<ul style="list-style-type: none"><li>» Receive the Disclosable Matter in accordance with this Policy and confirm whether the Discloser consents to disclose their identity or not.</li><li>» Provide details of the Disclosable Matter to the Whistleblower Investigation Officer for investigation.</li><li>» Ensure key information surrounding the Disclosable Matter is documented and any supporting evidence is collated, referenced and stored securely.</li><li>» Maintain complete confidentiality at all times</li></ul>
Whistleblower Investigation Officer	<ul style="list-style-type: none"><li>» Determine whether there is enough evidence to substantiate the Disclosable Matter and/or warrant an investigation, where appropriate.</li><li>» Carries out, or supervises, the investigation of the Disclosable Matter where appropriate.</li><li>» Ensure due process is followed and Disclosable Matters are handled efficiently, confidentially and in line with the relevant circumstances.</li><li>» Remain independent of the Eligible Whistleblower and/or person(s) being investigated. Where they cannot, ensure that the investigation is completed by someone independent and recuse themselves formally to the ARCC.</li><li>» Provide updates to the Eligible Whistleblower on the progress and expected timeframes of the investigation, including notification of when an investigation has concluded.</li><li>» Ensure key information surrounding the investigation of the Disclosable Matters is documented and any supporting evidence is collated, referenced and stored securely.</li></ul>
Whistleblower Protection Officer	<ul style="list-style-type: none"><li>» Support the health and wellbeing of the parties involved in the Disclosable Matter and its investigation (where undertaken).</li><li>» Provide or organise care and protection.</li></ul>

Role	Responsibility
	<ul style="list-style-type: none"> <li>» Maintain strict confidentiality and protects, as far as possible, the identities of the Discloser and the person(s) being investigated.</li> <li>» Remain independent of the Discloser and the person(s) being investigated.</li> </ul>
Risk and Governance Team	<ul style="list-style-type: none"> <li>» Provide and/or oversee regular training to the Board, the Executive Team, Eligible Recipients and employees on their responsibilities and obligations under the Policy.</li> <li>» Assess breaches in accordance with the Incident &amp; Breach Handling Policy.</li> </ul>
HR Team	<ul style="list-style-type: none"> <li>» Manage any disciplinary action associated with breaches of the Policy.</li> </ul>
Praemium Executive	<ul style="list-style-type: none"> <li>» Take reasonable steps to ensure Praemium Personnel are aware of their responsibilities under this Policy;</li> </ul>

## 6. Definitions

Term	Definition
Discloser	A person who makes a Disclosure under this Policy.
Disclosure/ Disclosable Matter	The reporting of information by a Discloser under this Policy.
Eligible Recipient	An Eligible Recipient is an individual or organisation authorised by Praemium to receive a Disclosure. See Appendix 1 for a list of Eligible Recipients.
Employees	All directors, officers and staff members of the Company or the Group, as well as consultants and contractors who have access to sensitive information.
Whistleblower Investigation Officer	The Chief Risk Officer or, where they are unable to oversee the investigation due to a conflict or another matter, the Chief Executive Officer, who carries out and/or supervises the investigation process.
Whistleblower Protection Officer	<p>The individual who is nominated by Praemium to safeguard the interest of, and provide support to:</p> <ul style="list-style-type: none"> <li>» A Discloser</li> <li>» Any parties subject to detrimental conduct</li> <li>» Any person(s) being investigated or supporting the investigation.</li> </ul> <p>This responsibility usually lies with the Chief People &amp; Culture Officer but can be another individual nominated by Praemium where it is considered inappropriate for the Chief People &amp; Culture Officer to assume this position.</p>

# Making a Disclosure under this Policy

---

## 7. Who Can Make a Disclosure under this Policy?

You can make a Disclosure under this Policy if you are, or have been, any of the following in relation to Praemium:

- » An employee of Praemium;
- » A supplier of services or goods to Praemium, including their employees and subcontractors;
- » Officer or an associate of Praemium e.g. a Director;
- » A relative, dependent or spouse of any of the above;
- » An employee of a third-party intermediary, including brokers and financial advisers who provide services to Praemium clients.

You can also make a report if you:

- » Previously held any of the above positions or functions; or
- » Are a relative, dependant or spouse of any of the individual referred to above.

If you are a current employee of Praemium, please consider whether you would prefer to raise concerns using other available channels in the first instance, such as through discussion with your manager or under the Grievance Procedure.

Under this Policy Praemium clients, customers or shareholders cannot make a Disclosure. However, we encourage clients, customers or shareholders to report any instances of wrongdoing or misconduct relating to Praemium they have identified via our website <https://www.praemium.com/contact-us/>. Any disclosures made by a client, customer or shareholder will be handled in accordance with Praemium's internal policies.

## 8. What Matters can be Disclosed under this Policy?

To make a Disclosure under this Policy, you must have a reasonable and genuine concern about actual or suspected misconduct or an improper state of affairs in relation to Praemium, its related entities or anyone at, or connected with, Praemium. A Disclosable Matter could include, but is not limited to:

- » Illegal conduct including theft, criminal damage against property, negligence, dealing in or use of illicit drugs, violence or threatened violence, breach of trust or breach of duty;
- » Fraud, bribery, corruption, financial irregularities, money laundering or misappropriation of funds;
- » Information indicating a systemic issue that impacts upon Praemium's ability to perform its functions;
- » Business behaviour and practices that may cause consumer harm;
- » Engaging in or threatening to engage in detrimental conduct against a Discloser;
- » Information that Praemium has engaged in conduct that:
  - » constitutes an offence against, or contravention of, a provision of legislation including the Corporations Act, the Australian Securities and Investments Commission Act 2001(Cth), the Financial Sector (Collection of Data) Act 2001 (Cth)
  - » Constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more;
  - » represents a significant danger to the public or the financial system; or
  - » is prescribed by regulation.

A Disclosable Matter does not need to involve a breach of a particular law or regulation to be disclosed under this Policy.

## 9. What Matters are excluded from being Disclosed under this Policy?

Whilst Praemium encourages openness and transparency, personal work-related grievances are excluded from being disclosed under this Policy.

If you are a current or former Employee of Praemium and wish to report a personal work-related grievance that relates to your employment only, please refer to the Grievance Procedure. Examples of personal work-related grievances include, but are not limited to:

- » An interpersonal conflict between the discloser and another employee;
- » A decision that does not involve a breach of workplace laws;
- » A decision about the engagement, transfer or promotion of the discloser;
- » A decision about the terms and conditions of engagement of the discloser; or
- » A decision to suspend or terminate the engagement of the discloser, or otherwise to discipline the discloser.

However, if a personal work-related grievance also relates to misconduct concerning Praemium (see section 9) then it may be disclosed under this Policy.

## 10. How to Make a Disclosure under this Policy

Praemium's priority is to identify and address wrongdoing and misconduct as early as possible. Praemium encourages you to make a Disclosure directly to Praemium in the first instance and is committed to ensuring the safety and protection of individuals in doing so.

When making a Disclosure, you can choose to identify yourself or remain anonymous.

Disclosure Method	Details
In Person	<ul style="list-style-type: none"><li>» Current Employees are encouraged to make a Disclosure directly to an Eligible Recipient outlined in Appendix 1 or any Director, secretary or senior manager of Praemium.</li><li>» Disclosures can be made in person, or you can use the contact details outlined in Appendix 1.</li></ul>
Post	<p>Praemium Limited</p> <p>In confidence: Whistleblower Disclosure</p> <p>Attn: Chief Executive Officer/Chief Risk Officer</p> <p>PO Box 322, Collins Street West, VIC 8007</p>

## 11. What Information Should be Included in a Disclosure?

Useful details to be provided as part of a Disclosure include:

- » Dates, times and locations;
- » Names of person(s)/party(ies) involved, including their position and department if known;
- » Relationship with those involved;
- » The nature of the Disclosure;
- » Possible witnesses;
- » Corroborating evidence;
- » Any other information that supports the Disclosure;
- » Your personal details, if you are comfortable to provide them, and whether you consent for your identity to be shared, as appropriate for the purpose of assessing and/or investigating the Disclosure and for supporting you through the process.

## 12. Anonymous Disclosures

You can choose to make an anonymous Disclosure. Praemium will adopt the following measures and mechanisms for protecting anonymity:

- » Where requested, your identity will be kept anonymous (e.g., through use of a pseudonym);
- » Your identity and the report made by you will be kept confidential and secure; and
- » You can refuse to answer questions you feel could reveal your identity at any time.

Praemium respects your right to anonymity but if you choose to remain anonymous then you must be aware that it in some instances it could make it difficult for Praemium to properly investigate or take action to address the Disclosable Matter.

## 13. External Disclosures

Where you do not feel comfortable making your Disclosure to an Eligible Recipient or via the methods outlined in section 10, you are also able to make a Disclosure to the following external bodies:

Disclosure Method	Details
Independent Whistleblower Hotline	Disclosures can also be made to PKF, an independent audit firm engaged by Praemium to handle disclosures on our behalf, through the following methods: <ul style="list-style-type: none"><li>» Call: 1800 962 042</li><li>» Online: <a href="http://www.pkftalkintegrity.com/?psp">www.pkftalkintegrity.com/?psp</a></li><li>» Email: <a href="mailto:praemiumwhistleblowing@pkf.com.au">praemiumwhistleblowing@pkf.com.au</a></li></ul>
Grant Thornton, Praemium's External Auditor	Post: Grant Thornton Collins Square Tower 5 727 Collins Street, Melbourne VIC 3008  Telephone: +61 (3) 8320 2222
External Bodies	Disclosures can also be made to the following external bodies: <ul style="list-style-type: none"><li>» ASIC</li><li>» ATO (for tax related matters)</li><li>» Another Commonwealth body prescribed by regulation</li><li>» A journalist of parliamentarian in the case of an emergency or where the Disclosure is considered to be of public interest (refer section 17).</li></ul>
Legal Practitioner	Disclosures made to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions in the Corporations Act are protected (even in the event the legal practitioner concludes that a Disclosure does not relate to a Disclosable Matter).

## 14. Protections after Making a Disclosure

When you make a Disclosure, you may qualify for certain protections under the law. This includes identity protection, protection from detrimental conduct and civil, criminal and administrative liability protection. Please refer to Appendix 1 for more information.

# Investigating a Disclosure under this Policy

---

## 15. How Praemium Handles & Investigates Disclosures

### 15.1. Receiving a Disclosure

Once a Disclosure has been received, the recipient of the Disclosure must:

- » Where possible, acknowledge receipt of the Disclosure to you as soon as practicable;
- » Confirm with you whether you consent to your identity being disclosed or not;
- » Provide details of the Disclosure to the Whistleblower Investigation Officer for investigation; and
- » Ensure key information surrounding the Disclosure is documented and any supporting evidence is collated, referenced and stored securely.

### 15.2. Initial Assessment of Disclosure

An initial assessment of the Disclosure will be made by the Whistleblower Investigation Officer (refer Section 7 for further information) and will determine whether:

- » Your Disclosure qualifies for legal protection under this Policy (refer Appendix 1 for more details); and
- » A formal, in-depth investigation is required.

Praemium will ensure the process followed is fair, timely and independent of any person/s involved in the Disclosure. Where a Disclosed matter relates to the conduct of an individual that could be an Eligible Recipient, the matter must be investigated with sufficient independence.

The Whistleblower Investigation Officer may appoint a Whistleblower Protection Officer to assist you through the investigation process (refer Section 7 for further information).

If the Disclosure relates to the conduct of an employee, the Whistleblower Investigation Officer may then discuss with the CEO and Whistleblower Protections Officer.

### 15.3. Investigating a Disclosure

Where it is deemed that your Disclosure requires a formal investigation, the Whistleblower Investigation Officer is responsible for ensuring the Disclosure is investigated thoroughly, completely, objectively, and fairly.

At a minimum, the Whistleblower Investigation Officer is responsible for:

- » Determining the nature and scope of the investigation;
- » Ensuring the investigation is conducted in a timely, fair and objective manner;
- » Determining the nature of any technical, financial or legal advice that may be required to support the investigation;
- » Determining whether there is enough evidence to substantiate or refute the matters put forward in the Disclosure;
- » Determining the timeframe for the investigation; and
- » Ensuring the Disclosure is handled confidentially.

Detailed records of the Disclosure must be maintained in a secure and confidential manner, including the Disclosure itself, investigations undertaken, actions taken to address the Disclosure and any further correspondence with you in relation to the progress of the matter.

Where a Praemium Employee is the subject of a Disclosure, the Whistleblower Investigation Officer must inform them of the investigation as required and advise of the appropriate support services available to them (e.g. counselling).

#### **15.4. Reporting**

At the conclusion of the investigation, the Whistleblower Investigation Officer will present a report to the Audit, Risk and Compliance Committee and, where appropriate, the Board. This report will include:

- » A summary of the investigation process and the evidence collected;
- » Conclusions drawn about the disclosed matter, including identification of any systemic issues and emerging risks;
- » Any recommendations on required remedial measures to prevent reoccurrence of the disclosed matter; and
- » Any action taken or required to be taken including whether there is a requirement to lodge a report with an external regulatory authority or enforcement agency.

The Audit, Risk and Compliance Committee will oversee any actions required to be taken to mitigate the recurrence of the disclosed matter.

### **16. Support for Praemium Employees**

Where a Praemium Employee is the subject of a Disclosure, they will be informed of the fact there is a Disclosure as required and given the opportunity to respond and provide supporting information. Disciplinary action will only be taken after an investigation is completed, findings disclosed to the ARCC and confirmed that allegations are substantiated.

Where appropriate, Praemium Employees being investigated will be contacted by the Whistleblower Protection Officer who will advise them of the appropriate support services available to them, such as third-party support providers or the appointment of an independent support person.

### **17. Policy Accessibility**

A copy of this Policy is made available to all relevant stakeholders through both Praemium's public website and the internal intranet page. Regular training sessions on the contents of this Policy are held at induction and on an ongoing basis. Praemium Employees are updated when any significant changes to this Policy occur.

# Appendix 1 – Legal Protections

---

If you choose to make a Disclosure under this Policy, you may be eligible for certain protections under Australian law. Praemium does not provide legal or financial advice and if you are in doubt as to your rights under this Policy, please seek independent legal advice.

## 18. Eligibility for Statutory Protection

You will qualify for protection under the *Corporations Act 2001* (Cth) and the *Taxation Administration Act 1953* (Cth) if you meet the following requirements:

- » You are one of the following:
  - » An employee of Praemium;
  - » A supplier of services or goods to Praemium, including their employees and subcontractors;
  - » Officer or an associate of Praemium e.g. a Director;
  - » A relative, dependent or spouse of any of the above;
  - » An employee of a third-party intermediary, including brokers and financial advisers who provide services to Praemium clients.
  - » You previously held any of the above positions or functions; or
  - » Are a relative, dependant or spouse of any of the individual referred to above.
- » You have reported your Disclosure to:
  - » An Eligible Recipient outlined in Appendix 2;
  - » Directors, secretaries and senior managers of Praemium;
  - » ASIC or another Commonwealth body prescribed by regulation;
  - » An external auditor of Praemium; or
  - » A legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the whistleblower provisions in the Corporations Act. You have reasonable grounds to suspect that the matter you have reported relates to actual or suspected misconduct or an improper state of affairs in relation to Praemium, its related entities or anyone at, or connected with, Praemium (refer section 9).
- » You have not knowingly or deliberately submitted a false report and you have information or materials to support your concern.

If you meet the above criteria, you will be afforded statutory protection even if you choose to remain anonymous. You can still qualify for statutory protection even if the Disclosure you make turns out to be incorrect or unsubstantiated.

Disclosures that do not meet the above criteria do not qualify for protection under the *Corporations Act 2001* (Cth) and the *Taxation Administration Act 1953* (Cth) but may be protected under other legislation e.g. *Fair Work Act 2009* (Cth).

## 19. Public Interest Disclosures and Emergency Disclosures

In certain circumstances, you can make a Disclosure directly to a journalist or parliamentarian and still qualify for statutory protection. You must either:

- » Have reasonable grounds to believe that disclosing the information is in the public interest (public interest disclosure); or
- » Have reasonable grounds to believe that the information concerns a substantial and imminent danger to the health and safety of one or more persons or not the natural environment (emergency disclosure).

It is important to understand the criteria for making a public interest or emergency disclosure and Praemium recommends that you seek independent legal advice before doing so. To qualify for statutory protection, you must meet the following criteria:

Public Interest Disclosure	Emergency Disclosure
A previous report has been made to ASIC or another prescribed Commonwealth body and at least 90 days have passed since	A previous report has been made to ASIC or another prescribed Commonwealth body (no wait period)
<p>You have reasonable grounds to believe:</p> <ul style="list-style-type: none"> <li>» Action is not being taken, or has not been taken, in relation to your Disclosure;</li> <li>» Making a further Disclosure is in the public interest</li> </ul>	The information concerns a substantial and imminent danger to the health or safety or one or more persons or to the natural environment
Before making the Disclosure, you have given written notice to the body to which the previous Disclosure was made that includes sufficient information to identify the previous disclosure and that you intend to make a public interest or emergency disclosure	
A Disclosure is made to a journalist, a member of the Parliament of the Commonwealth, the Parliament of a State, or the legislature of a Territory.	
The extent of the information disclosed is no greater than is necessary to inform the recipient of the misconduct or an improper state of affairs.	The extent of the information disclosed is no greater than is necessary to inform the recipient of the substantial and imminent danger.

## 20. Identity Protection

Where a Disclosure is protected under Australian law, Praemium has a legal obligation to protect the confidentiality of your identity. Praemium cannot disclose your identity or information that is likely to lead to your identification. Your identity will not be shared unless:

- » Praemium is permitted or required by law to share the identity with ASIC, APRA, a member of the Australian Federal Police or to another person or body prescribed by regulations;
- » Praemium is required to share your identity with a legal practitioner for the purposes of obtaining legal advice or legal representation;
- » The disclosure of details likely to lead to your identification is reasonable necessary for the effective investigation of the matter and all reasonable steps are taken to reduce the risk of your identification; or
- » You have provided your express consent for your identity to be shared.

Praemium will take practical steps to protect the confidentiality of your identity, including:

- » All personal information or reference to you witnessing an event will be changed (i.e., pseudonym);
- » You will be referred to in a gender-neutral context;
- » Where possible, you will be contacted to help identify certain aspects of your Disclosure that could inadvertently identify you;
- » Disclosures will be handled and investigated by qualified staff;
- » All paper and electronic documents and other materials relating to Disclosures will be stored securely;
- » Access to all information relating to a Disclosure will be limited to those directly managing and investigating the Disclosure;
- » Ensuring only a restricted number of people who are directly handling or investigating a Disclosure are made aware of your identity (subject to your consent);
- » Ensuring communications and documents relating to the investigation of a Disclosure are not sent to an email address or to a printer that can be accessed by other employees; and

- » Reminding each person who is involved in handling and investigating a Disclosure about the confidentiality requirements.

The contents of a Disclosure can be disclosed, with or without your consent, only if:

- » Praemium has taken all reasonable steps to reduce the risk that you will be identified from the information (e.g. de-identifying and redacting personal information);
- » The information in the Disclosure does not include your identity; or
- » It is reasonably necessary to allow Praemium to conduct their investigation into the issues raised in the Disclosure.

It is illegal to identify you or disclose information that is likely to lead to your identification, outside the above exceptions. Should this occur, you can lodge a complaint with Praemium or a regulator such as ASIC.

You can choose to remain anonymous while making a Disclosure, over the course of the investigation and after the investigation is finalised. You can refuse to answer questions that you feel could reveal your identity. However, if you wish to remain anonymous you should still maintain ongoing two-way communication with Praemium.

People may be able to guess your identity where:

- » You have previously mentioned to other people that you are considering making a Disclosure;
- » They are a very small number of people with access to the information; or
- » The Disclosure relates to information that you have previously been told privately.

## 21. Protection from Detrimental Conduct

Where a Disclosure is protected under Australian law, Praemium has a legal obligation to protect you, or any other person, from detrimental conduct in relation to the contents of the Disclosure. Detrimental conduct includes, but is not limited to:

- » Dismissal of an employee;
- » Injury of an employee in his or her employment;
- » Alteration of an employee's position or duties to his or her disadvantage;
- » Discrimination between an employee and other employees of the same employer;
- » Harassment or intimidation of a person;
- » Harm or injury to a person, including psychological harm;
- » Damage to a person's property;
- » Damage to a person's reputation;
- » Damage to a person's business or financial position; or
- » Any other damage to a person.

To ensure protection from detrimental conduct, Praemium will implement measures including:

- » Processes for assessing the risk of detriment against you and other persons, which will commence as soon as possible after receiving a Disclosure (including risk identification, analysis, evaluation, control and monitoring);
- » Support services, including the appointment of a Whistleblower Protection Officer;
- » Strategies to help you minimise and manage stress, time or performance impacts, or other challenges resulting from the Disclosure or its investigation;
- » Processes for ensuring anyone involved in the investigation are aware of their responsibilities to maintain your confidentiality;
- » Procedures on how you can lodge a complaint if you have suffered detriment; and
- » Interventions for protecting you if detriment has already occurred.

Detrimental conduct does not include administrative action that is reasonable to protect you from detriment (e.g., when the Disclosure relates to wrongdoing in the discloser's immediate work area). Protecting you from detrimental conduct also does not prevent the management of unsatisfactory work performance.

Where you believe you have suffered as a result of detrimental conduct you may seek independent legal advice or contact regulatory bodies such as ASIC, APRA or the ATO.

## 22. Compensation and Other Remedies

You may be able to seek compensation and other remedies through the courts if you suffer loss, damage, or injury because of detrimental conduct and Praemium failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct. Where necessary you should seek independent legal advice.

## 23. Civil, Criminal and Administrative Liability Protection

Where a Disclosure is protected under Australian law, you are protected from:

- » Civil liability (e.g. legal action against the Discloser for breach of contract, duty of confidentiality or another contractual obligation);
- » Criminal liability (e.g. attempted prosecution for Discloser for unlawfully releasing information); and
- » Administrative liability (e.g. disciplinary action for making the Disclosure).

These protections do not grant immunity for any misconduct you have engaged in that is revealed in your Disclosure.

## Appendix 2 – Eligible Recipients

---

Name	Barry Lewin
Title	Praemium Limited Chairman
Email	<a href="mailto:barry.lewin@slmcorporate.com">barry.lewin@slmcorporate.com</a>
Address	Level 19, 367 Collins Street, Melbourne VIC 3000

Name	Stuart Roberston
Title	Chair of the Audit, Risk & Compliance Committee, Non-Executive Director of Praemium Limited
Email	<a href="mailto:s.robertson@ellerstoncapital.com">s.robertson@ellerstoncapital.com</a>
Address	Level 19, 367 Collins Street, Melbourne VIC 3000

Name	Anthony Wamsteker
Title	Chief Executive Officer
Email	<a href="mailto:anthony.wamsteker@praemium.com">anthony.wamsteker@praemium.com</a>
Address	Level 19, 367 Collins Street, Melbourne VIC 3000

Name	Lorna Stewart
Title	Chief Risk and Corporate Operations Officer
Email	<a href="mailto:Lorna.stewart@praemium.com">Lorna.stewart@praemium.com</a>
Address	Level 19, 367 Collins Street, Melbourne VIC 3000

Name	PKF (Audit Firm)
Title	Independent Whistleblower Hotline
Phone	1800 962 042
Email	<a href="mailto:praemiumwhistleblowing@pkf.com.au">praemiumwhistleblowing@pkf.com.au</a>
Web Portal	<a href="http://www.pkftalkintegrity.com/?psp">www.pkftalkintegrity.com/?psp</a>