

# Whistleblower Policy



## **PIONEER CREDIT LIMITED ACN 103 003 505 (COMPANY)**

### **1. Purpose**

This Whistleblower Policy applies to the Company and its subsidiaries (Group).

Directors, employees, contractors, suppliers and consultants (Personnel) of the Group are expected to observe high standards of business and personal ethics in the conduct of their duties and responsibilities as set out in the Company's Code of Conduct. All Personnel of the Group must conduct themselves with integrity, honesty and fairness in all business practices and observe the rule and spirit of the social, legal and regulatory environment in which the Group operates.

The purpose of this Whistleblower Policy is to create awareness of the policy, inform Personnel of the process and encourage the reporting of contraventions (or suspected contraventions) of the Group's Code of Conduct and provide effective protection from victimisation or dismissal to those reporting by implementing systems for confidentiality and report handling.

### **2. Reporting responsibility**

It is the responsibility of all Personnel to comply with the Group's Code of Conduct and report contraventions or suspected contraventions in accordance with this policy.

### **3. No retaliation**

No Personnel who in good faith reports a contravention under this policy shall suffer detriment, either actual or threatened, harassment, retaliation or adverse employment or engagement consequence. If any Personnel retaliates against someone who has reported a contravention in good faith they will be subject to disciplinary action, which may include termination of employment or engagement with the Group.

### **4. Reporting contraventions**

This policy is intended to encourage and enable Personnel and others to raise serious concerns by the Group or Personnel about a possible contravention of the law or Code of Conduct including but not limited to:

- (a) fraud or other illegal activity or criminal offence;
- (b) failure by the Company or a representative of the Company to comply with any legal or statutory obligation;
- (c) breach of internal policy or procedure;
- (d) corrupt conduct;
- (e) unethical conduct;
- (f) socially irresponsible behaviour; or
- (g) any deliberate concealment relating to the above.

In most cases, you should approach your supervisor first as they may be in the best position to address a concern.

If you are not comfortable speaking to your supervisor or not satisfied with your supervisor's response, you are encouraged to speak with or make contact with the Report & Investigation Officer or the Chair of the Audit and Risk Management Committee.

Supervisors and managers are required to report suspected contraventions of the Group's Code of Conduct to the Report & Investigation Officer, who has specific and exclusive responsibility to investigate all reported contraventions. The Report & Investigation Officer can be contacted as follows:-

#### Report & Investigation Officer

*In person or by mail*

Level 6, 108 St. Georges Terrace, Perth WA

*By email*

[report&investigationofficer@pioneercredit.com.au](mailto:report&investigationofficer@pioneercredit.com.au)

#### Chair of the Audit and Risk Management Committee

*By email*

[auditchair@pioneercredit.com.au](mailto:auditchair@pioneercredit.com.au)

The Group would prefer that Personnel make any complaint or allegation openly and disclose their identity. However, Personnel can make a Report anonymously. Personnel should be aware that it will be more difficult to investigate a Report that is made anonymously and maintaining anonymity of the Personnel's identity may be difficult where the nature of the complaint or allegation points to one particular individual having made it or due to the inherent nature of any investigation process.

### **5. Report & Investigation Officer**

The Report & Investigation Officer is responsible for investigating and resolving all reported complaints and allegations concerning contraventions of the Group's Code of Conduct. The Report & Investigation Officer will advise the Managing Director.

The Report & Investigation Officer has direct access to the Audit and Risk Management Committee and, is required to report all complaints and allegations to the Chair of the Audit and Risk Management Committee and report to the Committee as a whole at least bi-annually on compliance activity with management comment. Any complaints and allegations raised will remain outstanding items with the Committee until satisfactory resolution has been reached.

### **6. Acting in good faith**

Anyone filing a complaint concerning a contravention or suspected contravention of the Group's Code of Conduct must act in good faith and have reasonable grounds for believing the information disclosed indicates a contravention of the Group's Code of Conduct. It is a serious matter to make allegations that prove to be unsubstantiated, or are made maliciously or known to be false and any person doing so may be subject to disciplinary action including termination.

## **7. Confidentiality**

Reports of contraventions or suspected contraventions will be kept confidential and may only be disclosed to ASX, ASIC, APRA, a member of the Australian Federal Police or to someone else with the consent of the discloser to the extent possible, consistent with the need to conduct an adequate investigation.

## **8. Handling of reported violations**

The Report & Investigation Officer will notify the person who reported the alleged contravention and acknowledge receipt of the report within 5 business days. All reports will be promptly investigated and, if warranted, appropriate corrective action will be taken. In conducting investigations, the Report & Investigation Officer must ensure they observe the confidentiality obligations and in particular must not disclose the information reported, the identity of the person making the disclosure or any information that is likely to lead to the identification of the person making the disclosure.

## **9. Communication of Whistleblower Policy**

The Report & Investigation Officer will ensure that the Whistleblower Policy is communicated to all Personnel. Employees are to receive training about the Whistleblower Policy and their rights and obligations under it at their induction into the Company with refresher communication annually. Managers are to receive training on how to deal with and respond to whistleblower reports with refresher communication annually.

## **10. Review of Whistleblower Policy**

The Company will monitor compliance with this Whistleblower Policy periodically by liaising with Personnel.

The Board will review this Whistleblower Policy at least annually and the policy will be subject to Board approval if any updates are made. Following such review, the Policy will be circulated to all Personnel.

## **10. Whistleblower Policy history**

Adopted: 25 February 2014

Last Reviewed: 21 August 2018