



Whistleblowing Policy

▶ Please note that this policy may be reviewed and changed from time to time

Owned & approved by

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Group Head of HR
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Version Control

VERSION	DESCRIPTION	AUTHOR	DATE
1.0	Initial Document	Becky Wei	25/06/2020
1.1	Final Document	Arvinder Grover	20/08/2020
1.3	Updated SFI Health and HR contacts per region	Angelina Go	17/11/2023
1.4	Updated Contacts	Angelina Go	26/06/2024
1.5	Add cyber disclosable matters	Sarkis Bedikian	17/07/2024

Introduction

SFI Health("The Company") seeks to create a strong foundation for good risk management and corporate governance. This type of foundation assists employees in deterring wrongdoing, escalating issues and contributing to our culture of accountability and risk management, including reporting potential issues when they arise (which is commonly referred to as 'whistleblowing').

Purpose

The purpose of this policy is to ensure that concerns can be raised regarding actual or suspected misconduct, non-adherence to applicable laws, or improper state of affairs or circumstances in relation to SFI Health, without fear of reprisal or retaliation. Accordingly, the Company wants to provide the framework for whistleblowing, and ensure that individuals who disclose potential contraventions or wrongdoing can do so safely, securely and with confidence that they will be protected and supported.

SFI Health is committed in supporting its corporate values, code of conduct and its ethics policy, protecting its long term sustainability and reputation, and is also devoted to meeting its legal and regulatory obligations.

If you have reasonable grounds to suspect that someone has engaged in misconduct, contravened the law, or that there is an improper state of affairs or circumstance, you are encouraged to speak up and disclose it. SFI Health takes these matters seriously and will ensure all disclosures are dealt with appropriately and on a timely basis.

The Company is required to comply with the obligations relating to protection of Whistleblowers in the Corporations Act 2001 (Cth) ("Act") and this Policy is prepared to comply with these obligations.

Who the policy applies to

This policy applies to all SFI Health employees, officers, directors, contractors, suppliers and workers (whether paid or unpaid).

As explained below, eligible Whistleblowers can be people internal or external to SFI Health . To the extent that a person external to SFI Health makes a protected whistleblower disclosure under the *Corporations Act 2001 (Cth)* in relation to SFI Health , then this policy also applies to them and to the disclosure they have made.

Who can be a whistleblower

A whistleblower is an individual who is:
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- (a) a current or former employee of SFI Health (whether permanent, part-time, casual, fixed-term, temporary, intern, or a secondee)
- (b) a current or former officer, secretary or director of SFI Health
- (c) a current or former supplier or contractor providing goods or services to SFI Health , and/or their employees (whether paid or unpaid)

- (d) an associate of SFI Health (for example a related body corporate, or a director or secretary of a related body corporate)
- (e) a person who is a relative of an individual mentioned in paragraphs (a), (b), (c), or (d) above
- (f) a person who is a dependant of an individual referred to in paragraphs (a), (b), (c) or (d) above, or of such an individual's spouse.

What is whistleblowing?

Whistleblowing is an action taken to make known a malpractice or wrongdoing that occurs in an organisation. It involves the disclosure of an organisational malpractice or wrongdoing by someone with access to information (such as a current or former employee) to an internal or external entity that has the power to review and address that wrongdoing.

Disclosable Matters

You are encouraged to report any information where you have reasonable grounds to suspect that the information concerns **misconduct**, or **an improper state of affairs or circumstances** in relation to the Company ("Disclosable Matters").

Examples of Disclosable Matters include:

- any conduct that contravenes a provision of: the Corporations Act 2001 (Cth), the Australian Securities and Investments Commission Act 2001 (Cth), the Banking Act 1959 (Cth), the Financial Sector (Collection of Data) Act 2001 (Cth), the Insurance Act 1973 (Cth), the Life Insurance Act 1995 (Cth), the National Consumer Credit Protection Act 2009 (Cth), the Superannuation Industry (Supervision) Act 1993, or any instrument made in relation to these acts;
- any conduct that constitutes an offence against any Commonwealth law that is punishable by imprisonment for more than 12 months;
- any conduct that represents a danger to the public or financial system;
- fraud;
- corruption;
- unethical behaviour;

- a serious breach of SFI Health's policies or code of conduct;
 - a serious and/or substantial waste, mismanagement or misuse of SFI Health's resources;
 - a substantial danger to the health or safety of any worker; and
 - engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made, or may be planning to make, a disclosure.
- Unauthorized access, use, disclosure, modification, or destruction of our information assets
 - Malicious or negligent acts that may compromise our information security.
 - Loss or theft of our information assets or devices
 - Misuse or abuse of our information systems or resources
 - Any other suspicious or unethical behaviour related to information security

Eligible disclosers can still qualify for protection even if their disclosure turns out to be incorrect.

What is not whistleblowing? (Personal work-related grievances)

Whistleblowing is not the same as making a complaint or raising a grievance, because the objective of blowing the whistle is to correct a wrongdoing or malpractice that affects the public interest and not to report a personal issue.

This Policy does not apply to personal work-related grievances. These are generally grievances in relation to an individual's current or former employment that have implications for that individual personally but do not:

- have any other significant implications for the Company; or
- relate to conduct about the matters covered in the definition of Disclosable Matters above.

Examples of personal work-related grievances include:

- an interpersonal conflict between employees;
- a decision that does not involve a breach of workplace laws;
- a decision about your engagement, transfer or promotion;
- a decision about your terms and conditions of engagement; or
- a decision to suspend or terminate your engagement, or otherwise to discipline you.

Employees are encouraged to resolve their personal work-related grievances and raise these grievances with a supervisor, a manager or a member of the Human Resources team.

A personal work-related grievance may still qualify for Whistleblower protection if, for example, the information also has significant implications for SFI Health or if the information also concerns a Disclosable Matter (this can be a “mixed report”).

A personal work-related grievance may also still qualify for Whistleblower protection if:

- SFI Health has breached employment or other laws punishable by imprisonment for 12 months or more, engaged in conduct that represents a danger to the public, or the disclosure relates to information that suggests misconduct beyond your personal circumstances;
- An employee suffers from or is threatened with detriment for making a disclosure; or
- An employee seeks legal advice or legal representation about the operation of the Whistleblower protections under the Act.

Intentionally or maliciously making false accusations motivated by self-interest is not whistleblowing.

Who can receive a disclosure?

A Whistleblower can make a report to any of the people listed below who are ‘eligible recipients’ in SFI Health , including certain eligible recipients who are based overseas:

- Any member in the Senior Executive Team of SFI Health
- Any current officer of SFI Health (being a current Director SFI Health);
- The Head of HR in the region;
- SFI Health external auditor
- The mentioned eligible recipients constitute the “Whistleblowing Review Group” (the “Group”) in SFI Health .

Once a whistleblowing report is made, SFI Health will deal with that report in the manner described below in this policy under the heading “**Handling and investigating a disclosure**”.

This will assist the Company in identifying and addressing wrongdoing as early as possible.

Whilst it is recommended to report matters internally at first instance, the Whistleblower will also be afforded protection where they have made a complaint:

- To ASIC or APRA (see “More Information” below);

- To a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the whistleblowing provisions of the Act; or
- Under the strict guidelines of an Emergency Disclosure or Public Interest Disclosure.

If you wish to seek additional information before making a disclosure, you may contact Group Head HR or an independent legal advisor.

How to make a disclosure

A Whistleblower can disclose the matter to one of the “eligible recipients” either in person, by telephone or in writing (in hard copy or electronic form).

A Whistleblower who is making a protected disclosure can do so anonymously, or they can identify themselves.

Depending on the circumstances, it might be appropriate for a Whistleblower to adopt a pseudonym for the purpose of making their disclosure.

Assessment of a disclosure (Review of the disclosure)

If you have identified yourself as part of your whistleblowing disclosure, you will receive an acknowledgement of your disclosure where the eligible recipient (and if appropriate, other members of The Whistleblowing Review Group) are able to contact you. The eligible recipient (and if appropriate, other members of the Group) will assess whether a disclosure falls within the intended scope of this policy. Members of the Group have the discretion to determine that a disclosure will not be dealt with under this policy, provided that the disclosure does not fall within the scope of applicable Whistleblower legislation.

If you wish to remain anonymous as part of your whistleblowing disclosure, you may do so, and SFI Health asks that you consider providing us with an anonymised email address (or another anonymised means of contacting you) that we can utilise to liaise with you and provide an acknowledgment of your disclosure.

All qualifying Whistleblower disclosures will be referred to a Whistleblower Investigation Officer.

The Whistleblower Investigation Officer is the SFI Health Group Company Secretary- George Tan.

Legal protections for Whistleblowers

It is important to state that any Whistleblower will not be discriminated against or disadvantaged in their employment with SFI Health for making a report or disclosure in accordance with this Policy, nor will they experience reprisals due to the actions in making

a report. SFI Health will take all reasonable steps to ensure that adequate and appropriate protection is being provided to anyone who makes a report. This protection applies if the concern is proven or not, regardless of whether it is reported to an external authority.

This policy establishes the protections that apply to disclosers who qualify for protection, including identity protection, protection from detrimental acts or omissions, compensation and other remedies, and protection from civil, criminal and administrative liability.

Identity protection

Confidentiality

SFI treats eligible disclosures confidentially and can protect any Whistleblower by limiting how their identity and information about them is shared, including maintaining their anonymity where requested and wherever possible. The identity of any Whistleblower will be kept confidential to the fullest extent possible and only shared as permitted by the Whistleblower or by law.

Access to all information relating to a disclosure will be limited to those directly involved in managing and investigating the disclosure. All paper and electronic documents relating to disclosures will be stored securely.

Anonymity

When making a disclosure, you may do so anonymously. Any Whistleblower can continue to remain anonymous over the course of any investigation and after the investigation has been finalised. Whilst you are encouraged to share your identity when making a disclosure if you can, as it may make it easier for SFI Health to address your disclosure, you are not required to do so.

It is illegal for a person to disclose the identity of a whistleblower (or information that is likely to lead to the identification of the whistleblower), unless:

- the identity of the whistleblower is being disclosed to ASIC, APRA or a member of the Australian Federal Police;
- the identity of the whistleblower is being disclosed to a legal practitioner for the purposes of obtaining legal advice or legal representation about the whistleblower provisions in the Act; or
- the identity of the whistleblower is being disclosed with the prior consent of the whistleblower.

In certain circumstances, it may be permissible for a person to disclose information that may lead to the identification of the whistleblower, if that information is necessary for the

purposes of investigating the matter, and provided that the person making the disclosure takes all reasonable steps to reduce the risk that the whistleblower will be identified.

Examples of measures that SFI Health may use from time to time to reduce the risk that a whistleblower's identity is revealed include:

- redacting the name of the whistleblower from relevant documents; and □
referring to the whistleblower in a gender-neutral context.

Protection from detrimental acts or omissions

SFI cannot engage in conduct that causes detriment to any eligible discloser (or another person) in relation to a protected disclosure, or in relation to a potential or proposed protected disclosure.

Examples of detrimental conduct are:

- dismissal or demotion 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;
- harm or injury, including psychological harm; and
- damage to a person's property, reputation or financial position.

Examples of actions that are not detrimental conduct:

- administrative action that is reasonable for the purpose of protecting a Whistleblower from detriment (e.g. moving a Whistleblower who has made a disclosure about their immediate work area to another office for protection purposes); and
- managing a Whistleblower's unsatisfactory work performance, if the action is in line with SFI Health's performance management framework.

Measures in place to protect against detrimental acts or omissions

SFI adopts a risk-based approach to assessing and controlling the risk of detriment. Depending on the circumstances the Company may take certain measures to protect the eligible discloser against detrimental acts or omissions which may include making modifications to their workplace, employing strategies to help them minimise and manage stress, providing with extended leave, or intervention if detriment has already occurred.

Civil, criminal and administrative liability protection

If qualified for protection under the Act, a Whistleblower is protected from civil, criminal or administrative legal action being taken against them in relation to the disclosure. This means legal or disciplinary action cannot be taken against you for reasons including a breach of your employment contract, breaching confidentiality or unlawfully releasing information because you made a report. The protections do not grant immunity for any misconduct the Whistleblower may have engaged in if that is revealed through the disclosure.

Compensation and other remedies

If qualified for protection under the Act, a Whistleblower can seek compensation and other remedies through the courts if:

- They suffer loss, damage or injury due to a disclosure; and
- SFI failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

Whistleblowers should seek independent legal advice and/or guidance from entities such as the ASIC or ATO, in these circumstances.

Handling and investigating a disclosure

Handling a disclosure

All whistleblowing reports are received and treated sensitively and seriously, and will be dealt with as promptly, fairly and objectively as is possible in the circumstances.

If a whistleblowing report was made within SFI Health to an eligible recipient, he/she will notify the Head of HR in the region and/or the Whistleblowing Investigations Officer, to assess the disclosure and determine whether:

- to seek guidance from one or more members of the Whistleblowing Review Group;
- it qualifies for protection under the Act; and
- an investigation is required, and if so;
- what steps should be taken to manage any risk of detriment.

Investigating a disclosure

Review of the Whistleblower Disclosures

The Whistleblower Investigation Officer and/or the Head of HR (as appropriate) will carry out a preliminary review of the Whistleblower Disclosure and will decide whether the allegations raised should be investigated. Whilst not all Whistleblower Disclosures will necessarily lead to an investigation, they will be assessed and a decision made as to

whether they should be investigated. For example, the Whistleblower Investigation Officer and/or the Head of HR may decide that the allegations were investigated previously and that a new investigation will not be undertaken. SFI Health's response to a Whistleblower Disclosure will vary depending on its nature (including the amount of information provided).

In some cases SFI Health may not be able to undertake an investigation if it is not able to contact the whistleblower (for example to obtain further information). In other cases SFI Health may be able to investigate a disclosure based on the information they have been provided, without the need to contact the whistleblower for more. In other cases, SFI Health may contact a whistleblower to ask for consent to a limited disclosure to facilitate the process. In each case, an assessment will need to be made based on the circumstances of that disclosure.

The Whistleblower Investigation Officer and/or the Head of HR will advise you of the decision whether to investigate, unless they have no means to contact you. If the Whistleblower Investigation Officer and/or the Head of HR decides that the matter will be investigated, the Whistleblower Investigation Officer and/or the Head of HR will conduct or commission an investigation.

Investigation process

Investigations will follow an objective and fair process, be conducted in as timely a manner as the circumstances allow and be independent of the person(s) about whom a whistleblowing report has been made. The Whistleblower Investigation Officer and/or the Head of HR will, as appropriate, and where possible, provide you with feedback on the progress throughout the investigation and expected timeframes of the investigation. Investigation timeframes will vary on a case by case basis. Provided there are no restrictions or other reasonable bases for doing so, persons against whom an allegation has been made will be informed of the allegation and will have an opportunity to respond to any allegation.

All employees must cooperate fully with any investigations.

Investigation findings

The investigation may conclude with a report from the Whistleblower Investigation Officer or other investigator. The report will include findings on the allegations and a summary of the evidence on which the findings are based. Any such report will remain the property of SFI Health and will not be shared with you or any person against whom allegations have been made. If appropriate and depending on the circumstances, SFI Health will endeavour to inform you when the investigation has concluded and SFI Health will also endeavour to inform you about whether or not the allegations were substantiated. There may be circumstances where it may not be appropriate to provide the Whistleblower with details of the outcome of the investigation.

Further action

How the findings of the investigation are documented and reported, and what steps are taken, will depend on the nature of the whistleblowing report.

Generally, an investigation report will be considered by the Whistleblower Review Group and other appropriate stakeholders to determine what, if any, actions are to be taken.

Where an investigation identifies a breach of our Code of Conduct and/or other internal policies and procedures, appropriate action will be taken. This may include but is not limited to terminating or suspending the employment or engagement of persons involved. Any outcome will be determined at SFI Health's absolute and sole discretion.

Reasonable basis for making the disclosure

When making a disclosure, you will be expected to have reasonable grounds to suspect the information you are disclosing is true. You will not be penalised and can still qualify for protections even if the information turns out to be incorrect. However, you must not make a report you know is not true, or is misleading. Where it is found that you knowingly made a false report, this may be a breach of the Code of Conduct and will be considered a serious matter that may result in disciplinary action. There may also be legal consequences if you make a knowingly false report.

Ensuring fair treatment of individuals mentioned in a disclosure

SFI has the following measures in place to ensure the fair treatment of individuals mentioned in a disclosure:

- disclosures will be handled as confidentially as is possible;
- each disclosure will be assessed and may be the subject of an investigation;
- the objective of an investigation is to determine whether there is enough evidence to substantiate or refute the matters reported;
- when an investigation needs to be undertaken, the process will be objective, fair and independent;
- an employee who is the subject of a disclosure will be advised about the subject matter of the disclosure as and when required by principles of natural justice and procedural fairness and prior to any actions being taken e.g. if the disclosure will be the subject of an investigation.

How to access the Policy

Within the Company

This Policy will be available to all SFI Health employees as follows:

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- Employee induction training;
- SFI Health – UKG Pro Learning and
- SFI Health compliance training and communications in all communities

SFI Health Health also provides periodic training, including training at induction, to:

- Employees about this policy and their rights and obligations under it;
- Eligible recipients and those involved in dealing with reports about how to handle and respond to reports.

Outside the Company

This policy is available on the Company's external websites.

Reviewing and updating the policy

This Policy will be reviewed regularly to determine its appropriateness.

More Information

For more information, please contact a member of the HR team.

- [Treasury Laws Amendment \(Enhancing Whistleblower Protections\) Act 2019](#)
- [Whistleblowing by ASIC](#)
- [How ASIC handles Whistleblower reports \(INFO 239\)](#).

Appendix 1 'Eligible Recipients'

A Whistleblower can make a report to any of the people listed below who are 'eligible recipients' in SFI Health, including certain eligible recipients who are based overseas:

Robert Hendriks SFI Health Group, CEO	Robert.hendriks@sfihealth.com
Gilbert Cheong Foo SFI Health Group, CFO	Gilbert.cheongfoo@sfihealth.com
George Tan SFI Health Group, Company Secretary	George.tan@sfihealth.com
Arvinder Grover SFI Health Group Head of HR	Arvinder.Grover@sfihealth.com
Gian Luca Ligas SFI Health Group Head of Marketing & Scientific Affairs	GianLuca.Ligas@sfihealth.com
David Sisk General Manager SFI Health Americas	David.Sisk@sfihealth.com

Reports may also be made by **post** to c/- Company Secretary, SFI Health Group, Level 2, 170 Pacific Highway, St. Leonard's NSW 2066 (or marked to the attention of one of the Eligible Recipients referred to above).

You can also contact **Head of HR** in your region.

Laura Buongarzone EMEA	Laura.Buongarzone@sfihealth.com
Dana Dean AMERICAS	Dana.Dean@sfihealth.com
Arvinder Grover ASIA	Arvinder.Grover@sfihealth.com