WHISTLEBLOWER POLICY

SHARESIES AUSTRALIA LIMITED

Sharesies Australia Limited (Sharesies)
ABN 94 648 811 830
Australian Financial Services Licence No. 529893

www.sharesies.com.au
PO Box Q1410, Queen Victoria Building, NSW 1230

Effective 21 September 2026

Sharesies

Contents

Introduction	03
Policy Responsibility & Review	04
The Whistleblower Protection Officers (WPOs)	04
Protections for Whistleblowers	04
How to make a protected or tax disclosure	06
Making a Disclosure	07
Support for Whistleblowers	07
Investigation of Protected Disclosures	07
Fair Treatment of Employees	09
Version Control	09

Policy details

Effective	21 September 2026
Next Review Date	21 September 2028
Version	1.2
Staff Owner	Louise Nield, Senior Legal Counsel & Company Secretary, Australia
Reviewed by	Tyrone Marquez, Compliance Officer and George Harriman, Senior Risk and Compliance Officer
Approved by	Sharesies Australia Limited Audit & Risk Committee

Sharesies Australia Limited

Whistleblower Policy

Introduction

This Whistleblower Policy outlines the principles and practices implemented by Sharesies Australia Limited ('Sharesies', 'we', 'us', 'our') to give effect to the whistleblower protection regime. It sets out how a person can raise concerns about wrongdoing at Sharesies, and the protections available to them when they do.

Sharesies is committed to fostering a workplace where wrongdoing can be raised and addressed without fear of detriment. This Policy is designed to deter wrongdoing, improve our culture and increase transparency in relation to protected disclosures of wrongdoing in the workplace.

This Policy complies with Part 9.4AAA of the Corporations Act 2001 (Cth) (the **Act**), as amended by the Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 (Cth) (together, the Whistleblower provisions), and reflects the guidance set out in ASIC Regulatory Guide 270: Whistleblower policies (**RG 270**). Where a disclosure concerns the tax affairs of Sharesies, the corresponding tax whistleblower regime under Part IVD of the Taxation Administration Act 1953 (Cth) also applies.

A '**protected disclosure**' means a report related to misconduct or an improper state of affairs or circumstances at Sharesies. This includes information related to conduct that the Whistleblower has reasonable grounds to suspect:

- is fraudulent or corrupt;
- is illegal;
- is unethical (eg altering company records, wilfully making false entries in the financial records);
- breaches Sharesies' policies;
- is potentially damaging to Sharesies such as maladministration or substantial waste of resources;
- is bullying and harassment;
- is unsafe;
- may cause serious financial or non-financial loss to Sharesies or damage its reputation or be otherwise detrimental to the interests of Sharesies and its customers;
- is a breach of tax laws or an improper state of affairs and circumstances in relation to the tax affairs of Sharesies; or
- involves another kind of serious impropriety including retaliatory action against anyone raising a concern under this Policy.

We make this Policy available to all **Eligible Persons** upon commencement of their employment with Sharesies, and by publishing it on our website.

'**Eligible Persons**' means:

- directors and officers of Sharesies;
- current and former employees who are permanent, part-time, fixed-term or temporary, interns, secondees and managers;
- suppliers of services of goods to Sharesies including their employees (eg current and former contractors, consultants, service providers and business partners);
- any business associates; and
- a relative, dependent or spouse of any of the above.

Concerns that relate solely to personal work-related grievances do not qualify as 'protected disclosures' under s.1317AA(4) and (5) of the Corporations Act 2001 (Cth) and are accordingly not covered by this Policy. Refer to Sharesies Human Resource policies for the management of personal grievances. Examples of a personal work-related grievance include:

- 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 the engagement of the discloser; or
- a decision to suspend or terminate the engagement of the discloser, or otherwise to discipline the discloser.

This Whistleblower Policy sets out the following information:

i. the protections we have in place for Whistleblowers, including the protections under the Whistleblower provisions;
ii. how and to whom a person can make a protected disclosure;
iii. how we support Whistleblowers and protect them from detriment;
iv. how we investigate protected disclosures;
v. how we ensure the fair treatment of employees mentioned in, and the subject of, protected disclosures; and
vi. how this Policy is made available to our officers and employees

This Policy should be read alongside ASIC Information Sheet (**INFO 238**) which provides further guidance on Whistleblower rights and protections.

Policy Responsibility & Review

This Policy is reviewed every two years.

Any recommendations that this Policy be amended will be made to the AU Country Manager and/or Board of Directors (the **Board**) for approval. The Board may delegate and revoke its delegation at any time for approval of this Policy and subsequent amendments.

Where a role title changes, the relevant owner, reviewer and approver will be the responsibility of the person who holds the closest job description to the currently nominated owner, reviewer and approver positions.

The Whistleblower Protection Officers (WPOs)

Sharesies has nominated the role of Senior Legal Counsel and Company Secretary as the Whistleblower Protection Officer (WPO).

Where a disclosure has a conflict of interest with the WPO, concerns can be raised and disclosures made to the Country Manager—Australia and/or the General Counsel (or equivalent) of the Sharesies Group. These individuals are referred to as the **Secondary WPOs.** As part of your disclosure, you must make them aware of the conflict of interest with the WPO.

If the conflict extends to the Secondary WPOs, disclosure can be made to the most appropriately senior person within the Sharesies Group who is not impacted by a conflicted interest. Refer to the Eligible Recipients section of this Policy. Disclosures may be made to these other Eligible Recipients. As part of your disclosure, you must make them aware of the conflict of interest with the WPO and Secondary WPOs.

Protections for Whistleblowers

Sharesies has implemented the various protections for Whistleblowers.

Sharesies will adhere to any Whistleblower protection requirements and not take action to undermine the protections afforded to Whistleblowers, including taking actions that may jeopardise a Whistleblower's right to protection.

Anonymous protected disclosure—Whistleblower

A Whistleblower is not required to provide their name when making a protected disclosure.

Where details of the Whistleblower have been provided, we ensure that the following information is kept confidential:

a) the Whistleblower's identity;
b) any information that is likely to lead to the identification of the Whistleblower; and

c) any information obtained directly or indirectly as a result of the protected disclosure, which reveals the Whistleblower's identity;

except where:

a) the Whistleblower has consented to the protected disclosure of their identity;

b) the protected disclosure is reasonably necessary for the purposes of investigating the conduct disclosed by the Whistleblower, and all reasonable steps are taken to reduce the risk of the Whistleblower being identified;

c) the identity information is required to be disclosed to a regulator, or to the Australian Federal Police, or to other Commonwealth, State or Territory authorities with functions or duties relevant to the protected disclosure; or

d) the identity information is disclosed to a legal practitioner for the purpose of obtaining legal advice or representation in relation to the protected disclosure.

A person (including Sharesies) is not required to disclose the identity of a Whistleblower, or information that is likely to lead to the identification of a Whistleblower, to a court or tribunal, unless it is necessary for the purpose of giving effect to the Whistleblower provisions, or if the court or tribunal orders.

Sharesies ensures that protected disclosures are handled anonymously and confidentially where applicable.

Anonymous protected disclosure—Tax Whistleblower

A tax Whistleblower is not required to provide their name when making a protected disclosure. Accordingly, Sharesies ensures that it keeps the following information confidential:

a) the tax Whistleblower's identity;

b) any information that is likely to lead to the identification of the tax Whistleblower; and

c) any information obtained directly or indirectly as a result of the protected disclosure, which reveals the tax Whistleblower's identity;

except where:

a) the tax Whistleblower has consented to the protected disclosure of their identity;

b) where the protected disclosure is reasonably necessary for the purposes of investigating the conduct disclosed by the tax Whistleblower, and all reasonable steps are taken to reduce the risk of the tax Whistleblower being identified;

c) the identity information is required to be disclosed to the Australian Taxation Office, or to the Australian Federal Police; or

d) the identity information is disclosed to a legal practitioner for the purpose of obtaining legal advice or representation in relation to the protected disclosure.

A person (including Sharesies) is not required to disclose the identity of a tax Whistleblower, or information that is likely to lead to the identification of a tax Whistleblower, to a court or tribunal, unless it is necessary for the purpose of giving effect to the Whistleblower provisions, or if the court or tribunal orders.

Immunities for Whistleblowers

Whistleblowers and tax Whistleblowers are protected from civil, criminal and administrative liability, and from the imposition of a penalty. This means that protected disclosures made by a Whistleblower are not admissible as evidence against the Whistleblower or the tax Whistleblower in legal proceedings, unless the proceedings against the Whistleblower relate to whether the protected disclosure is false.

Tax Whistleblowers are also protected from contractual or other remedies which arise on the basis of the tax disclosure. This means that where the tax Whistleblower is a party to a contract (including an employment contract), that contract cannot be terminated on the basis that the tax disclosure constitutes a breach of the contract.

Sharesies encourages Whistleblowers and tax Whistleblowers to seek their own independent legal advice to ensure they are complying with the relevant rules and regulations to obtain protection as a Whistleblower.

Protection from victimisation for Whistleblowers and tax Whistleblowers

Whistleblowers and tax Whistleblowers are protected from victimisation. It is an offence for Sharesies or any other person engaged by or affiliated with Sharesies to engage in detrimental conduct that causes, or threatens to cause, any detriment to another person, even where:

a) a protected disclosure has not occurred;

b) the victimiser has no actual knowledge that the protected disclosure or tax disclosure has occurred; or

c) the victimiser does not intend that the conduct will cause detriment.

This protection extends to persons involved in receiving or investigating the protected disclosure or tax disclosure, or a colleague, supporter, friend or family member of the Whistleblower or the tax Whistleblower.

A person can seek compensation from Sharesies for any loss, damage or injury suffered as a result of the detrimental conduct, including where we failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct. Compensation can, in some situations, include reinstatement of employment.

Sharesies has procedures in place to take reasonable steps to prevent a person, including its employees and officers, from engaging in detrimental conduct.

How to make a protected or tax disclosure

Eligible Recipient

Before making a protected disclosure, a Whistleblower can contact a WPO for additional information about this Policy and Whistleblower provisions.

A Whistleblower can make a protected disclosure to an eligible recipient, which includes:

- a director, officer, senior manager, auditor, or actuary of Sharesies, or people holding these positions in a related company
- people authorised by Sharesies to receive Whistleblower reports—such as dedicated Whistleblower hotlines
- ASIC or APRA, or
- a lawyer, for the purpose of obtaining legal advice or legal representation about the Whistleblower protections

Referred to as '**Eligible Recipient/s**'.

A Whistleblower can also share the concern publicly, for instance to a journalist or a parliamentarian, in limited circumstances. This is limited to concerns about an emergency or matter in the public interest. ASIC has prepared an information sheet (**INFO 238**) to provide guidance on steps to follow when disclosing publicly to maintain your protection.

A public disclosure, for instance via social media or mass email, is not protected by the Whistleblower provisions.

A tax Whistleblower can make a tax disclosure to a tax recipient, which includes the above recipients, as well as the Commissioner.

Making a Disclosure

We encourage a Whistleblower to raise a concern with a WPO as the first step, or at **speakup@sharesies.com** (Subject: "Confidential—Whistleblower protected disclosure").

If a Whistleblower wishes to raise a concern anonymously, he/she may send a written disclosure to the address below and include an address or means of contact:

Whistleblower Protection Officer,
Sharesies Australia
PO Box Q1410,
Queen Victoria Building,
NSW 1230.

When making a disclosure, a Whistleblower is encouraged (but not required) to provide:

- a description of the conduct or circumstances they are concerned about;
- the names or roles of any persons involved, if known;
- any supporting information or records; and
- a preferred method of ongoing contact, if they wish to assist any investigation or receive updates.

Support for Whistleblowers

Protecting and supporting Whistleblowers and tax Whistleblowers

As set out under the section on Protections for Whistleblowers, Sharesies has in place policies and procedures which ensure that:

a) as part of the protected disclosure and investigation process, we maintain the confidentiality of the Whistleblower's and the tax Whistleblower's identity, and do not disclose this information except as allowed under the Whistleblower provisions;

b) if the Whistleblower or tax Whistleblower is an employee or one of our suppliers, we will not terminate our contract or arrangement with them purely because they have made a protected disclosure or a tax disclosure;

c) we take reasonable steps to ensure that Whistleblowers and tax Whistleblowers are not the subject of detrimental conduct;

d) we will not take action against a Whistleblower or a tax Whistleblower on the basis of breach of employment contract, where the breach of the employment contract relates to the protected disclosure.

Investigation of Protected Disclosures

Sharesies is committed to ensuring it promptly investigates protected disclosures and tax disclosures.

Where the protected disclosure or tax disclosure is large in scope, or may involve regulators and/or external third parties, we will consider whether to retain external advice or counsel in order to conduct the investigation.

Sharesies will not disclose information that is likely to lead to the identification of the Whistleblower without their consent, unless:

a) the information does not disclose the Whistleblower's identity;

b) we have removed information relating to the Whistleblower's identity or other information that is likely to lead to the identification of the Whistleblower (e.g. their name, position, title and other identifying details); and

c) it is reasonably necessary for the purpose of investigating the issues raised in the protected disclosure

Sharesies has a procedure to investigate protected disclosures and tax disclosures, as follows:

If a disclosure is made to a Sharesies director or senior manager, the matter will immediately be referred to the WPO, who will develop an investigation plan. The investigation plan will include:

a) appointing compliance and/or legal staff members to form part of the investigation team, ensuring that they are aware of this Policy and

the legislative protections for Whistleblowers and tax Whistleblowers (in particular regarding the protection of confidential information);

b) collecting all information relevant to the disclosure or the tax disclosure from the Whistleblower or the tax Whistleblower, including:

- **i.** a full description of the circumstances upon which the disclosure or the tax disclosure is based;
- **ii.** the names of the Sharesies personnel, agents, or clients involved, and an explanation of their involvement;
- **iii.** details of the persons who are aware of the matter, both within Sharesies and externally;

c) within 7 days of collecting all of the above information, reviewing the information collected in order to prepare a preliminary report regarding the matter to the Sharesies Board. The preliminary report will summarise the information collected, and include recommendations to the Sharesies Board regarding:

- **i.** whether the disclosure qualifies to be classed as a protected disclosure;
- **ii.** the cause of the issue which led to the protected disclosure or the tax disclosure;
- **iii.** the extent of the issue (for example, the number of employees, customers or related parties who are either involved in or aware of the matter);
- **iv.** the potential harm to Sharesies;
- **v.** the measures to be taken to address the issues raised by the protected disclosure or the tax disclosure, which include compliance with all relevant legislation;

d) consult with the Sharesies Board regarding the appropriate action that Sharesies needs to take regarding the protected disclosure, which may include:

- **i.** asking the Whistleblower to consent to a limited disclosure of the protected disclosure;
- **ii.** assessing whether a formal, in-depth investigation is required;
- **iii.** where appropriate, delegating the investigation to an external third party;
- **iv.** obtaining external legal advice;
- **v.** notifying a regulator of the protected disclosure or of the tax disclosure;
- **vi.** communicating with Sharesies staff, customers and related parties (where appropriate) regarding the protected disclosure or the tax disclosure;
- **vii.** conducting a broad review on the subject matter or the work area disclosed; and/or
- **viii.** investigating an anonymous protected disclosure.

The investigation findings must be documented and reported to the WPO, who is responsible for taking appropriate action.

Complete records are created and kept in relation to each investigation.

The method of documenting and reporting the findings of the investigation to persons other than the WPO will depend on the nature of the protected disclosure.

We will provide the Whistleblower with regular updates of the progress of the investigation. However, the frequency of the updates will depend on the nature of the protected disclosure.

At the conclusion of the investigation, while maintaining the confidentiality of other parties involved, Sharesies will communicate the investigation findings to the Whistleblower. However, Sharesies may, in its discretion, determine that there are circumstances whereby it may not be appropriate to provide details of the outcome to the Whistleblower. In this case, Sharesies will not disclose details of the investigation to the Whistleblower.

Sharesies acknowledges that the investigation process has limitations. We may not be able to undertake an investigation if we are not able to contact the Whistleblower, for example, if a protected disclosure is made anonymously and the Whistleblower has refused to

provide, or has not provided, a means of contacting them.

Fair Treatment of Employees

As set out under the section on Protections for Whistleblowers, Sharesies takes all reasonable steps to ensure that all staff are protected from detrimental conduct. This obligation includes protecting persons named in a protected disclosure or a tax disclosure from detrimental conduct.

Sharesies has in place detailed policies and procedures which deal with our anti-bullying and anti-discrimination obligations. All staff and officers are required to read our policies and procedures upon commencing their employment or engagement with Sharesies, and must review those policies annually.

We may determine the most appropriate time to inform an individual who is the subject of a protected disclosure about an investigation, provided that we notify that person before making any adverse finding against them.

Version Control

Date of Change	Summary Of Change	Approver
8 March 2024	Version 1 release	Brendan Doggett Country Manager, Australia
17 March 2025	Version 1.1	George Harriman
21 September 2026	Version 1.2	Sharesies Australia Limited Audit & Risk Committee

Contact us

help@sharesies.com.au
https://www.sharesies.com.au
PO Box Q1410
Queen Victoria Building
NSW 1230

Sharesies