

WHISTLEBLOWER POLICY

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2018.05.27	1.0	Initial creation and approval	P&C Business Partner, Kelly Armitage	Director of P&C, Merylee Crockett	WHS & Compliance Manger, Alicia Keddie
2019.08.30	2.0	Annual Review	P&C Business Partner, Kelly Armitage	Director of P&C, Merylee Crockett	
2020.06.01	2.1	Addition of Modern Slavery disclosures to FairCall capability	Risk & Compliance Manager, Sian Duffin	Head of Risk & Compliance, Clint Seagrave	
2021.09.06	2.2	Annual Review	WHS & Compliance Manger, Alicia Keddie	Head of Risk & Compliance, Clint Seagrave	

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1. Purpose

One of our core values is 'speak your mind' and we encourage our people to have open and honest conversations. Our Code of Conduct, compliance standards, and policies guide our day-to-day decisions, actions and behaviours and govern our business.

This Policy complements the normal communication channels that exist for raising concerns or grievances between people leaders and employees without fear of reprisal, by providing a confidential and independent means to raise concerns.

2. Scope

This policy applies to all employees, contractors, service providers, suppliers and their family members. The policy does not form part of an employee's contract of employment.

This policy is to be read in conjunction with all applicable Interactive policies.

"You" or "your" or similar refers to Interactive employees, contractors and service providers, as applicable. "We" or "us" or "ours" or similar refers to Interactive.

3. Related documents

Documents related to this policy are as follows:

- Supplier and Partner Code of Conduct
- Company Code of Conduct
- Interactive Cultural Values
- Corporate Style Guide
- Social Media Policy
- Workplace Grievance, Disciplinary Procedure and Performance Management Policy
- Anti-Discrimination, Bullying & Harassment Policy
- Health & Safety Policy

4. Legislation

This policy is governed by the following legislation:

- The *Fair Work Act 2009* (Cth) (for employees and contractors in Australia)
- The *Corporations Act 2001* ("*Corps Act*")
- Modern Slavery Act 2018
- Anti-discrimination legislation applicable in your jurisdiction
- Workplace health and safety laws applicable in your jurisdiction

5. Whistleblower Policy

Interactive's Whistleblower Policy and service reflects our commitment to the highest standards of ethical conduct in the workplace by:

- Encouraging the reporting of suspected or actual wrongdoing.
- Protecting and supporting the dignity, wellbeing, career and good name of the disclosing persons who report suspected or actual wrongdoing to the service; and
- Contributing to a culture of continual improvement.

5.1 Who can make a disclosure to the Whistleblower service?

Under the Policy, any of the following people can disclose suspected or actual wrongdoing:

- Employees of Interactive.
- Contractors (including a contractor for the supply of services or goods, engaged by or on behalf of Interactive).
- Subcontractors engaged by or on behalf of Interactive.
- Employees of an outsourced services provider undertaking work on behalf of any LoB within Interactive.
- Former employees of Interactive who have ceased to be employed with Interactive (voluntarily or otherwise).
- Suppliers of Interactive.
- Family members of the above-mentioned people.

5.2 Wrongdoing types

Interactive encourages the reporting of suspected or actual wrongdoing – being conduct that is illegal, unacceptable or the concealment of such conduct. It includes but is not limited to:

- **Fraud**
Dishonest activity that causes actual or potential financial loss, or an unjust advantage, to Interactive or any person or organisation, including activity involving customers or third parties where Interactive systems and process are involved.
- **Questionable accounting or auditing practices**
Accounting/auditing practices that may be technically legal, but do not comply with the intent or spirit of the law accounting or auditing standard
- **Unacceptable behaviour**
An employee or contractor dishonestly acting, or dishonestly failing to act, in the performance of functions of their employment, or dishonestly taking advantage of their employment to obtain benefit for himself or herself, Interactive or for another person or organisation, or to cause loss to another party / person.
- **Legal or regulatory non-compliance**
Illegal behaviour (e.g. theft, drug sale/use, violence or threatened violence and criminal damage against property) and breach of any applicable legislation/regulations.
- **Bribery**
Providing, offering or causing a benefit to another person (or soliciting or receiving a benefit from another person) with the intention of influencing for a business or personal advantage, where the benefit is not legitimately due and regardless of whether the recipient is the intended target of the benefit.
- **Adverse behaviour**
Unethical behaviour or wrongdoing, including breaches of Interactive's policies and codes of conduct.
- **Supply Chain Issues**
Potential for unethical or illegal activities within the supply chain including, but not limited to, forced labour, child labour, debt bondage, domestic servitude or other forms of slavery identified in the Modern Slavery Act 2018. Also any incidents of environmental legislation breaches such as illegal dumping, pollution or contamination.



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Other serious improper conduct that may be detrimental to the interests of the Company or cause either financial or non-financial loss.

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6. Accessing the service

The Policy establishes a number of different channels under which you can report suspected or actual wrongdoing to the Whistleblower Program. These include an independently monitored external hotline and reporting service, called FairCall, which is operated by KPMG.

You can make a disclosure of any suspected or actual wrongdoing (a wrongdoing disclosure) to the Whistleblower Program via FairCall as follows:

FairCall Telephone: 1800 931 135 (Australia)

0800 576 401 (New Zealand)

FairCall Web: <https://www.kpmgfaircall.kpmg.com.au/Interactive>

FairCall Post: The FairCall Manager
KPMG Forensic
PO Boc H67
Australia Square
Sydney NSW 1213

FairCall Fax Number: +61 2 9335 7466

7. Support and Protection

Interactive is committed to providing fairness, support and protection in response to reports of wrongdoing and will not tolerate any reprisals, or threats of reprisal, by any member against a disclosing person.

The Whistleblower Program will take appropriate measures to support a disclosing person's wellbeing and protect disclosing persons (excluding former employees and former non-executive directors) from adverse action by the Company due to their wrongdoing disclosure (even if the wrongdoing disclosure is subsequently determined to be incorrect or is not substantiated).

8. Anonymity and confidentiality

Wrongdoing disclosures may be submitted to the Whistleblower Program anonymously.

The Whistleblower Program will not disclose (i) the substance of a wrongdoing disclosure (ii) the identity of the disclosing person (unless agreed) and (iii) any information likely to lead to the identification of the disclosing person without obtaining the disclosing person's prior consent.

Where KPMG collects, uses and discloses personal information as part of the FairCall service, it does so in accordance with KPMG Australia's privacy statement, available at: <http://www.kpmg.com/AU/faircallprivacy>.

Where a disclosing person provides their contact details to FairCall, those contact details will not be provided to the Company without the disclosing persons' consent.