

Whistleblower Policy

Document History & Approval

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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
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 Fair Call capability	Risk & Compliance Manager, Sian Duffin	Head of Risk & Compliance, Clint Seagrave
2025.05.30	7.0	Updated contact, and other information related to reporting, and mapping all the policies to reflect the new service provider	Padma Kallupalya, Safety & Sustainability Manager	Chief People Officer, Merylee Crockett

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1. Purpose

At Interactive, 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, and provides a confidential and independent means to raise concerns, within the scope of these guidelines.

Interactive is committed to protecting and supporting the dignity, wellbeing, career, and professional reputation of anyone reporting misconduct. Recognising the dynamic nature of our operating environment, we have established clear pathways for communication through our Code of Conduct, compliance standards, and Quality System. However, where regular avenues are not appropriate or sufficient, this policy offers a confidential and independent process for reporting serious misconduct.

2. Scope

This policy applies to all current and former employees, contractors, service providers, Board members, consultants, customers, 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

Document	Location
<ul style="list-style-type: none">• Quality Policy• Supplier and Partner Code of Conduct• Code of Conduct• Social Media Policy• Workplace Grievances and Performance Management Policy• Sexual Harassment, Discrimination, Bullying Policy• Health & Safety Policy• Mental Health and Wellbeing Policy• Privacy Policy• Security Incident Response Plan• Customer Feedback Handling – Policy and Procedure• Risk Management Policy	The Wire – General Policies and Procedures page

<ul style="list-style-type: none">• Interactive Cultural Values• Corporate Style Guide	The Wire– Corporate Documents page

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 is committed to upholding the highest standards of integrity and ethical behaviour by fostering an open and supportive culture where individuals can raise concerns about actual or suspected unlawful, unethical, or undesirable conduct without fear of detriment.

While we encourage the use of established communication channels outlined in our existing policies and procedures, we recognise that in certain situations these channels may not be appropriate or sufficient.

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 that is known or has been witnessed.
- Protecting and supporting the dignity, wellbeing, career and good name of the disclosing persons who report suspected or actual wrongdoing to the service.
- Ensuring that all disclosures are handled lawfully, fairly, and promptly, with a commitment to procedural fairness and accountability.
- Maintaining confidentiality of the discloser, the content of the report, and all related information, wherever possible.
- Ensuring that any disclosures are used as an opportunity to improve our culture, systems and behaviour.

Improper activity, conduct, or wrongdoing may include, but is not limited to:

- Inappropriate conduct – such as violence, abuse, neglect, or exploitation.
- Unlawful or unethical actions – including fraud, corruption, illegal behaviour, undeclared or mismanaged conflicts of interest, misuse of Interactive’s information or resources, and serious mismanagement.

- Breach of standards or values – such as dishonesty, unsafe practices, policy violations, discrimination, harassment, bullying, victimisation, or behaviour that damages Interactive's reputation.
- Failure to meet service or professional standards – including inadequate customer protection, or practices that compromise ethical business conduct.

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, Erase IT and Slipstream.
- 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 line of business 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:

5.2.1 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.

5.2.2 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.

5.2.3 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 themselves, Interactive or for another person or organisation, or to cause loss to another party / person.

5.2.4 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.

5.2.5 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.

5.2.6 Adverse behaviour

Unethical behaviour or wrongdoing, including breaches of Interactive's policies and codes of conduct.

5.2.7 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.

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

6. Application of Policy

6.1. Making a Report

Interactive's policies and procedures encourage individuals to raise concerns through established internal channels, such as their manager, a representative from People & Culture, or, for external parties, through the relevant Operational Manager or Service Delivery Manager.

However, we recognise that there may be circumstances where it is not possible, appropriate, or comfortable to raise concerns through these normal channels, or where the concern has not been adequately addressed. In such cases, Interactive has established a secure and confidential alternative pathway through its Whistleblower Policy.

To ensure transparency and provide the Board and/or management with a clear view of any serious concerns, Interactive has engaged an external, independent service provider to manage and receive disclosures in a confidential and impartial manner. Our current provider is **Whistle Blowing Services Pty Ltd**

This arrangement helps protect the anonymity of the person making the disclosure and ensures concerns are handled objectively and independently of day-to-day operations.

There are three confidential avenues available to make a protected disclosure:

- Online Report – via a secure web portal managed by Whistleblowing Services.
- Phone Hotline – where you can speak to a trained operator confidentially.
- Mail Submission – by sending a written disclosure directly to the provider.

6.2. To make a report

BY PHONE – call – 1300 687927 – 24 Hours / 7 Days per week

- When requested please answer:
- **'Interactive'** when asked for the 'Unique Key'
- **'Interactive2025'** when asked for the 'Client Reference Number'

ONLINE – <https://www.whistleblowingservice.com.au/interactive/>

- Please click on the 'Make a Report' button. You will be redirected to the new page where you need to:
- enter **'Interactive'** in the 'Unique Key' field
- enter **'Interactive2025'** in the 'Client Reference Number'
- Click on **'next'**

You can choose to remain anonymous or reveal your identity when making a protected disclosure. If you wish to remain anonymous, Interactive encourages you to submit your report via this secure online reporting platform.

This service, provided by [whistleblowingservice.com.au](https://www.whistleblowingservice.com.au), is a fully independent and external reporting channel established to ensure Interactive Pty Ltd delivers the best possible reporting experience. Most importantly, it enables us to uphold our commitment to protecting those who speak up—safeguarding your identity, wellbeing, and trust throughout the process.

6.3. What Should I Report?

You should consider making a report if you believe that Interactive's standards, values, or policies are not being met and that there is conduct or wrongdoing the organisation should be made aware of. This includes suspected or actual misconduct that may breach the law, our internal policies, procedures, or Code of Conduct.

Examples could include

- Breaches of state or federal legislation.
- Conduct that violates **Interactive's** Code of Conduct.
- Illegal, immoral, or illegitimate practices.
- Mismanagement or governance failures.
- Practices that endanger the health or safety of people.
- Environmental harm or unsafe environmental practices.

This policy generally does **not** cover personal work-related grievances (e.g. interpersonal disputes or dissatisfaction with workplace conditions), unless the matter also involves serious misconduct or systemic risk to the organisation.

However, if you are unsure whether a concern qualifies, you are still encouraged to report it. The independent reporting service will assess your disclosure and guide next steps.

When, making a report, please provide as much information as possible, such as:

- The nature and specifics of the suspected wrongdoing.
- Names or roles of any individuals involved.
- Any direct evidence or documents you have.
- Whether other information might be available to assist
- Dates, times, or locations relevant to the matter.

The more detailed your report, the more effectively Interactive can assess and take appropriate action. Limited information may reduce our ability to respond.

If a disclosure is found to be false or without sufficient basis, it may not be progressed.

Interactive also reserves the right to review whether the disclosure itself constitutes a breach of the Code of Conduct.

6.4. Action Interactive might take after a disclosure

Interactive will assess the issues raised to determine the appropriate approach to review the disclosure.

When we establish there is an existing system of handling issues, Interactive may choose to use that pathway. For example, any disclosure deemed to be a grievance will be dealt with under the *Workplace Grievances and Performance Management Policy*.

Resolving customer feedback to ensure satisfaction and address any complaints, including those involving customer mistreatment, will be managed under the Customer Feedback Handling Policy and Procedure.

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 Interactive due to their wrongdoing disclosure (even if the wrongdoing disclosure is subsequently determined to be incorrect or is not substantiated).

Please note that in some situations an individual may be requested to participate in an investigation. This will occur not because they made the disclosure, but because when an investigation is required, their role was identified as a role that should be consulted.

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 a disclosing person provides their contact details to the Whistleblower Program, those contact details will not be provided to Interactive without the disclosing persons' consent.

Interactive will take all reasonable precautions to store any records relating to a report of wrongdoing securely and to permit access by authorised persons only

Our Security Incident Response Plan incorporates data breach procedures to ensure any unauthorised access, disclosure, or loss of sensitive information is managed promptly and in compliance with legal obligations and Privacy Policy. In cases where a data breach or security concern is reported by an internal whistleblower, protections under the Whistleblower Policy apply, ensuring the individual is not subject to retaliation and that their identity is kept confidential, where legally permissible

8.1. What Support is Available to Me?

As an Interactive employee, you have access to the following support services at any time:

Employee Assistance Program (EAP) provided by Converge International

- **Australia:** 1300 OUR EAP (1300 687 327)
- **New Zealand:** 0800 666 367
- **International:** +61 3 8620 5300

These services are confidential and available 24/7 to support your wellbeing.

8.2. References

ASIC – [Information Sheet 238](#)

APRA – [Information for Whistleblowers](#)