



Whistleblower Policy

Effective 18 January 2023

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1. Introduction

- 1.1 This document is the Whistleblower Policy.
- 1.2 The purpose of this Policy is to ensure we are committed to a strong risk culture and ethical behaviour. Our values; Honest, Human, Passionate, Recognition, Dynamic and Awesome Service, together with our Risk and Compliance frameworks, help influence how we behave, make decisions and interact with others, be that with our customers, our colleagues or our suppliers.
- 1.3 It builds on Youi's values and culture, its high standards of conduct and the ethical behaviour that is expected of all Youi employees.
- 1.4 At Youi, our Code of Conduct outlines the importance of speaking up and we are committed to fostering a culture where our people feel safe to speak up on matters that concern them. This includes providing all current and former employees, contractors, directors, customers and suppliers and their relatives, dependents or spouses with the opportunity to report any actual or suspected wrongdoing, or any other issue through Youi's Speak Up Program.
- 1.5 You are encouraged to speak up if you observe or suspect conduct that concerns you. This policy sets out how you are protected when you speak up and it is an important tool to help Youi identify wrongdoing that may not otherwise be uncovered in the absence of a safe and secure means for disclosing wrongdoing.
- 1.6 Youi will support you throughout raising a concern through the Speak Up Program and we do not tolerate any form of retaliation or victimisation as a result of you speaking up in accordance with this policy.
- 1.7 This policy aims to provide clarity on how Youi supports you so that you:
 - Are encouraged to express your concerns and speak up;
 - Know how to express your concerns and speak up;
 - Know what will happen when you express your concerns and speak up; and
 - Feel safe in expressing your concerns and speaking up.
- 1.8 The Whistleblower Policy applies with effect from the Effective Date.
- 1.9 The Youi Code of Conduct contains guidance on the process of disclosing non-compliance with this Policy. The raising of breaches, or potential breaches, of a Youi policy forms an integral part of Youi's risk management framework.

2. Scope

- 2.1 This Policy applies to the Youi Group.
- 2.2 This Policy applies to all Youi Group employees, service providers, and contractors in all Youi Group locations. Youi's directors are also subject to this Policy.
- 2.3 It incorporates the OUTsurance group requirements, as far as applicable.
- 2.4 This policy does not cover risk and compliance issues you raise via your Manager or reported as a Risk Incident. If you are worried you may suffer personal disadvantage, or wish to use the protections under this policy, please refer to Section 5.
- 2.5 This policy does not cover grievances that relate to personal grievances, discrimination or harassment. Employees must raise these in line with the Grievance Resolution Policy and Anti-Discrimination and Harassment Policy. These issues should be raised directly with your Manager, ExCo member or HR. Former employees who do not have access to these resources can raise issues through the Speak Up hotline and the report will be referred to HR.
- 2.6 This policy does not cover customer complaints. Customers must raise their concerns by contacting a Youi advisor, the Youi internal disputes team, the external ombudsman, or the Australian Financial Complaints Authority, AFCA. For further details, refer to www.youi.com.au/handling-your-complaint or call 13 YOUI (9684).

3. Definitions

- 3.1 Terms not defined below may be defined throughout this document.
- 3.2 "**Youi Group**" or "**Youi**" or "**Companies**": Youi Holdings Pty Ltd (ABN 41 124 972 425), an Authorised Non-Operating Holding Company and the Level 2 Head of the Youi Group, and its subsidiaries:
 - Youi Pty Ltd (ABN 79 123 074 733), authorised to carry on insurance business in Australia;
 - Youi NZ Pty Limited (CN 4476298) ("**Youi NZ**"), a non-regulated subsidiary, which provides call centre services to Youi;
 - Youi Properties Pty Ltd (ABN 604 123 873), a non-regulated subsidiary of Youi; and
 - Youi Holdings Share Option Plan Managers Pty Ltd (ACN 131 122 908), a non-regulated subsidiary.

3.3 “**OUTsurance**”: OUTsurance Holdings Ltd (Reg No. 1997/022260/06, South Africa), which holds the majority of the shares in the Company through OUTsurance International Holdings Pty Ltd (Reg No. 2007/004026/07, South Africa).

3.4 **Term**: In this policy, defined terms are capitalised. Those terms have the meaning given to them below.

Term	Definition
Allegations	Allegations of Reportable Conduct raised in a disclosure by a Whistleblower made under this policy.
Board	Board of directors of Youi
Contractors	Individuals who are not employees, and corporations or organisations, engaged to perform services for Youi.
Detrimental Conduct	Any actual or threatened conduct that could cause a detriment to the Whistleblower as a result of making the disclosure, including: <ul style="list-style-type: none">• Termination of employment;• Isolation, harassment, bullying or intimidation;• Personal or financial disadvantage;• Unlawful discrimination;• Harm or injury, including psychological harm;• Damage to reputation; or• Any other conduct that constitutes retaliation or reprisal.
Director	Director of Youi’s board of directors
Disclosure	Report or statement

Eligible Recipient	<p>An Eligible Recipients is:</p> <ul style="list-style-type: none"> • The Speak Up Program Manager; or • The Executive General Manager (“EGM”) for Legal and Compliance; or • The Head of Compliance; or • The Head of Internal Audit; or • An ExCo Member; or • A Director of Youi; or • A member of Core Integrity, which is an external and independently monitored company and its contact details are contained in this policy. <p>You can qualify for whistleblower protections by reporting to an Eligible Recipient as described in section 5.3.</p>
Employee	Full time, part time and casual employees of Youi.
ExCo Member	Person occupying a position on the Executive Committee of Youi.
Investigations Team	A specialist team within Youi that is accountable for the investigation of internal fraud, bribery and corruption, serious integrity-based misconduct and external fraud events involving claims fraud or organised crime.
Reportable Conduct	<p>Means any conduct in relation to Youi that is:</p> <ul style="list-style-type: none"> • Dishonest; • Fraudulent; • Corrupt; • Illegal; • Unethical; • Tax avoidance by Youi; • In breach of internal policy (including the Code of Conduct); or • Misconduct or an improper state of affairs in relation to Youi; <p>Reportable Conduct does not include ‘personal work-related grievances.’ For example, an interpersonal conflict between Staff Members.</p>

Speak Up Program	A program to provide safe avenues and formal processes to enable employees and third parties to raise issues without fear of reprisal. The program is managed by the Speak Up Program Manager.
Staff Members	A full time or part time employee of, or contractor to, Youi
We	Youi
Whistleblower Disclosure	A disclosure of Reportable Conduct made by a Whistleblower to an Eligible Recipient that is being treated in accordance with this policy.
You	References to “You”, “you”, “your” refer to a Whistleblower or someone contemplating making a disclosure.

4. Policy Statements

- 4.1 We are committed to fostering a culture where our people feel safe to speak up on matters that concern them.
- 4.2 We will support you throughout raising a concern through the Speak Up Program.
- 4.3 We will provide internal and external channels for you to be able to Speak Up and raise your concerns, including the option to raise concerns anonymously.
- 4.4 We investigate and record all concerns fairly, objectively and confidentially.
- 4.5 We will make available Youi's confidential counselling service (EAP), to you if you are a current or former Employee (or an immediate family member thereof).
- 4.6 We will support and protect you even if it turns out your concerns are mistaken or not substantiated. A Whistleblower Protection Officer will be made available to provide protections, as outlined in this policy, for someone raising Reportable Conduct.
- 4.7 We will not tolerate any form of retaliation or victimisation as a result of you speaking up in accordance with this policy.
- 4.8 We will not restrict you from disclosing Reportable Conduct with a government agency, law enforcement body, tax office, or regulator in accordance with any relevant law, regulatory or prudential standard applicable to jurisdictions in which Youi operates.
- 4.9 You are expected to have reasonable grounds to suspect the information or concerns you are disclosing are true and are made in good faith. You will not be penalised if the information turns out to be incorrect. However, you must not knowingly 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.
- 4.10 This Policy is published internally on our Intranet (YourWorld). It can be found via the Policies Register, Risk Incident Register, or RLC Department homepage. The Policy is also published on our website and is accessible to potential disclosers within and outside of Youi.
- 4.11 Breach of the Policy:
- **Consequences:** Breach of this policy may be regarded as misconduct, which may lead to disciplinary action (including termination of employment or engagement). An individual may also be exposed to criminal or civil liability for a breach of relevant legislation.

- **Escalation:** Any alleged breach of this policy will be taken seriously and, if appropriate, will be separately investigated. Potential or realised breaches of obligations outlined in this policy must be escalated to the Policy Owner.

5. Process and Procedures

5.1 How to make a Disclosure of Reportable Conduct

Refer to Annexure A of this policy for details of the channels available to raise concerns.

5.2 Making the Disclosure

This policy applies where you make a disclosure of Reportable Conduct (Refer terms and definitions in Section 3) to an Eligible Recipient:

- The Speak Up Program Manager; or
- The EGM for Legal and Compliance; or
- The Head of Compliance; or
- The Head of Internal Audit; or
- An ExCo Member; or
- A Director of Youi; or
- A member of Core Integrity.

5.2.1 Reportable Conduct will not include disclosures determined by the Speak Up Program Manager or EGM for Legal and Compliance to fall outside the scope of this policy, as described in the “Assessment of a Disclosure” Section 5.4.

5.2.2 When making a disclosure, you may do so anonymously. While you are encouraged to share your identity when making a disclosure, as it will make it easier for Youi to address your disclosure, you are not required to do so. If you do not share your identity, Youi will assess your disclosure in the same way as if you had revealed your identity. However, there may be some practical limitations in conducting the investigation if you do not share your identity.

5.2.3 If an anonymous disclosure is made through the Speak Up Hotline, you will receive a unique reference number. You can then contact the Speak Up Hotline to provide further information or request an update at any time.

- 5.2.4 All information received from you will be treated confidentially and sensitively.
- 5.2.5 If you make a disclosure, your identity (or any information which would be likely to identify you) will only be shared if:
- You give your consent to share that information; or
 - The disclosure is allowed or required by law (for example, disclosure to a lawyer to get legal advice relating to the law on whistleblowing).
- 5.2.6 In addition, in the case of information likely to identify you, if it is reasonably necessary to share the information for the purposes of an investigation, all reasonable steps will be taken to reduce the risk that you will be identified.
- 5.2.7 The non-identifying content of your disclosure may need to be shared in order to report significant matters to Youi's governance Committees, such as the Internal Risk Committee, Board Risk Committee, Board Audit Committee or Board.

5.3 Protection

- 5.3.1 Protections available under Australian law may apply to disclosures of wrongdoing made in accordance with this Policy. This section outlines the protections available if a disclosure qualifies for protection under the Corporations Act 2001 (Cth) or Taxation Administration Act 1953 (Cth) ("whistleblower laws"), as applicable.
- 5.3.2 In order for your disclosure to qualify for protection under the whistleblower laws:
- a) You must be a Whistleblower as defined in section 3.5 above;
 - b) Your disclosure of information must relate to Reportable Conduct; and
 - c) You make the disclosure of Reportable Conduct directly to:
 - an Eligible Recipient, or to ASIC, APRA or another Commonwealth body prescribed by regulation; or
 - a legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the whistleblower laws.
- 5.3.3 A disclosure that does not relate to Reportable Conduct as defined by section 3.5 above will not be protected under the applicable Australian whistleblowing laws, unless it is an 'emergency disclosure' where the information concerns substantial and imminent danger to health, safety or environment or a 'public interest' disclosure under the whistleblower laws.
- 5.3.4 You will have access to the assistance of the Whistleblower Protection Officer as provided in this policy. Details of the role of the Whistleblower Protection Officer are provided in Section 6.

5.3.5 Youi will take reasonable steps to protect you from Detrimental Conduct and will take appropriate action if such conduct is identified.

5.3.6 Youi also strictly prohibits any form of Detrimental Conduct against people who are involved in an investigation of a Whistleblower disclosure in response to their involvement in that investigation.

5.3.7 The specific protections available to you in relation to a Whistleblower Disclosure are:

a) Protection of your identity.

It is illegal for a person to identify you, or disclose information that is likely to lead to you being identified, other than:

- Where you have provided consent to disclose it;
- To ASIC, APRA, or the Australian Federal Police, or to a lawyer for advice about the whistleblower protections;
- Where it is reasonably necessary to disclose information for the purposes of investigating the issues raised in the Whistleblower Disclosure as long as the information does not include your identity and we take all reasonable steps to reduce the risk of you being identified.

We may face difficulties investigating or internally addressing or correcting the misconduct unless you provide some approval for us to use the information you disclose. Further details on our investigation procedure and the measures we have in place to protect confidentiality are set out in sections 5.5 and 5.6.

b) Protection against legal action.

You are protected against certain legal actions related to making the wrongdoing report, including:

- Criminal prosecution (and the disclosure cannot be used against you in a prosecution, unless the disclosure is false);
- Civil litigation (such as for breach of an employment contract, duty of confidentiality, or other contractual obligation); or
- Administrative action (including disciplinary action).

This protection does not grant immunity to you for any misconduct that you were involved in that is revealed in the report.

c) Protection from Detrimental Conduct.

It is illegal for someone to cause or threaten detriment to you because they believe or suspect that you have made, may have made, or could make a wrongdoing report.

A person that does so may receive a civil penalty or be charged with a criminal offence. These penalties apply even if you have not made a wrongdoing report, but the person causes or threatens detriment to you because they believe or suspect you have or might make a report.

Youi does not tolerate reprisals. Youi will take reasonable steps to protect you and any people who are involved in an investigation of a Whistleblower Disclosure from Detrimental Conduct and will take appropriate action if such conduct is identified.

Further details on the practical measures we have in place to protect you against Detrimental Conduct are set out in sections 5.6, 5.7 and 5.8.

d) Compensation and other remedies.

You can seek compensation through a court if you suffer loss, damage or injury for making a Whistleblower Disclosure and Youi has failed to take reasonable precautions and exercise due diligence to prevent the Detrimental Conduct. You can also pursue other remedies, including reinstatement, an apology, a court injunction to prevent or stop Detrimental Conduct. It is your responsibility to bring any such action for compensation and we encourage you to seek independent legal advice.

5.3.8 You could lose your protections under Australian law if:

- a) your conduct is revealed as a part of the wrongdoing. However, making a report may be taken into account as a mitigating factor in considering any disciplinary or other action;
- b) you do not have reasonable grounds to believe that your wrongdoing report is true;
- c) you knowingly give false or misleading information within a wrongdoing report. Knowingly giving false or misleading information may also constitute a breach of Policy, and could be subject to significant disciplinary action.
- d) you disclose information relating to wrongdoing or Reportable Conduct to someone not authorised to receive it (e.g. to the media without meeting required criteria for protection);
or
- e) you disclose information that could be used to identify someone who made a Whistleblower Disclosure or about whom a Whistleblower Disclosure has been made.

5.4 Assessment of a Disclosure

- 5.4.1 All disclosures received via the Speak Up Program will be triaged and assessed by the Speak Up Program Manager or EGM for Legal and Compliance to determine whether a disclosure falls within the scope of this policy.
- 5.4.2 The Speak Up Program Manager or EGM for Legal and Compliance 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. The Speak Up Program Manager or EGM for Legal and Compliance may discuss matters with the Head of Compliance if assistance on this determination is required.

5.5 Investigation

- 5.5.1 The Whistleblower Investigation Officer or Speak Up Program Manager will carry out a preliminary review of the Disclosure and will decide whether the Allegations raised should be investigated. Not all Disclosures will necessarily lead to an investigation (for instance a disclosure may already have been investigated previously) but all disclosures will be assessed, and a decision made as to whether they should be investigated.
- 5.5.2 If the Whistleblower Investigation Officer decides that Allegations will be investigated, the Whistleblower Investigation Officer will conduct or commission an investigation.
- 5.5.3 The Whistleblower Investigation Officer will advise you of the decision whether to investigate, unless the disclosure has been made anonymously and has no means to contact you.
- 5.5.4 Investigations will follow a fair process, be conducted in a timely manner as the circumstances allow and be independent of the person(s) about whom an Allegation has been made.
- 5.5.5 The Whistleblower Investigation Officer will, as appropriate, provide you with feedback on the progress and expected timeframes of the investigation. 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.
- 5.5.6 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. To the extent permitted under applicable laws, the Whistleblower Investigation Officer may inform you and/or any person against whom Allegations have been made by you of the findings. Any report will remain the property of Youi and will not be shared with you or any person against whom Allegations have been made.

5.5.7 Where the investigation substantiates the report, Youi will consider whether changes to processes, systems and/or training are required to reduce the likelihood of the Reportable Conduct happening again. Where a person is found to have engaged in misconduct, the matter will be dealt with in accordance with Youi's disciplinary procedures. This may include disciplinary action being taken, including dismissal. Any instances of serious criminal matters will be reported to the police or other appropriate regulatory authorities.

5.6 Confidentiality

5.6.1 When the Speak Up Program (or any other Eligible Recipient) receives a Whistleblower report we must not disclose your identity or information that will likely lead to your identification, without your consent. There are serious penalties for Youi and/or individuals if they do not comply with the legislative requirements around maintaining the confidentiality of your identity. We will not disclose your identity without obtaining prior consent. In all circumstances (including where it is reasonably necessary to share the information you have shared with us, for the purposes of an investigation) we will take all reasonable steps to reduce the risk that you will be identified (unless you have consented to the disclosure of your identity).

5.6.2 We have measures in place for ensuring confidentiality, including the following secure record-keeping and information sharing procedures:

- a) all paper and electronic documents and other materials relating to Whistleblower Disclosures are stored securely;
- b) all information relating to a Whistleblower Disclosure can only be accessed by those directly involved in managing and investigating the disclosure;
- c) where identity is provided, only a restricted number of people who are directly involved in handling and investigating a disclosure are made aware of the identity or information that is likely to lead to the identification of a Whistleblower;
- d) communications and documents relating to the investigation of a disclosure will not be sent to an email address or a printer in a manner that can be accessed by staff other than those directly involved in managing and investigate the disclosure. Additionally, some of the measures we may adopt to reduce the risk that you will be identified from the information contained in a disclosure may include some or all of the following, as appropriate in the circumstances:
 - using a pseudonym in place of your name;
 - redacting your personal information or references to you witnessing an event;
 - referring to you in a gender-neutral context;

- where possible, consulting with you to help identify aspects of your disclosure that could inadvertently identify you, for example if you mention to others that you are considering making a disclosure; and
- ensuring all disclosures will be handled and investigated by qualified staff who have been trained in whistleblower protections, including the confidentiality requirement that an unauthorised disclosure of your identity may be a criminal offence.

5.7 Support

5.7.1 If you have shared your identity with the Program the Whistleblower Protection Officer can offer the following support:

- a) work with you to understand and manage any concerns you are experiencing, including managing stress or other welfare impacts, time or performance impacts, or other challenges resulting from the Disclosure or its investigation;
- b) refer you to the Employee Assistance Program, which has been established to assist employees who wish to seek counselling to help resolve issues;
- c) provide an open line of communication for you to report any act of Detrimental Conduct (i.e. harassment, intimidation or victimisation) for making the whistleblower report;
- d) assess the risk of Detrimental Conduct against you and take steps to mitigate that risk, for example where appropriate and in consultation with your manager, allowing you to perform your work duties from another location, reassigning you or other employees to another role or modifying the way in which you perform your work duties;
- e) address any Detrimental Conduct you may have suffered because you made a Whistleblower Disclosure, for example, investigate the Detrimental Conduct, take disciplinary action, allow you to take extended leave as appropriate, develop a career management plan that involves new training and career opportunities or explore compensation and other remedies; and
- f) provide you with regular progress updates and the investigation outcome, as appropriate.

5.8 Escalations

5.8.1 You should immediately inform the Whistleblower Protection Officer if you are concerned that:

- a) You may be, are being, or have been subjected to Detrimental Conduct (refer Section 3 terms and definitions); or
- b) Your disclosure has not been dealt with in accordance with this policy, including any assessment made by the Whistleblower Investigations Officer or Speak Up Program Manager.

- 5.8.2 The Whistleblower Protection Officer will consider the concerns you have raised and, if appropriate, may take such action as the Whistleblower Protection Officer considers appropriate. Although the Whistleblower Protection Officer may not be able to take action if you wish to remain anonymous.
- 5.8.3 You may request that the Whistleblower Protection Officer escalate your concerns to the Chair of the Board Audit Committee if you are not satisfied with the:
- a) Findings of the investigation; or
 - b) Decision of the Whistleblower Investigations Officer not to investigate.
- 5.8.4 If you make such a request, you may provide the Whistleblower Protection Officer with a written submission to be sent to the Board Audit Committee Chair setting out your concern. When considering the request, the Board Audit Committee Chair is not required to reopen or reinvestigate the matter.

6. Roles and Responsibilities

6.1 Document Owner

- 6.1.1 The Document Owner is responsible for ensuring the policy is maintained, including that it is aligned with relevant legislation, regulations and Youi's internal requirements, strategy and values.
- 6.1.2 The Document Owner manages the process for updating the policy in accordance with the Review timing outlined in this policy, including providing a clear summary of the changes to the policy for the Board to approve.

6.2 Monitoring and Assurance

- 6.2.1 The EGM for Legal and Compliance is responsible for ensuring that this Policy:
- a) is implemented and monitored; and
 - b) is reviewed to evaluate its continuing effectiveness and to ensure Youi has sufficient organisational competence to carry out its obligations under its authority provided by APRA or under its AFS licence.

6.3 Exceptions Management

- 6.3.1 Any exceptions to meeting the requirements of this Policy need to be formally approved by the Document Approver.
- 6.3.2 Exceptions need to be appropriately recorded, e.g. via a circular resolution or in the minutes of a meeting where the approval was given.

6.4 Other responsibilities

- 6.4.1 This policy has six principal roles. Their responsibilities are set out in the following table.
- 6.4.2 In order to protect the Whistleblower, a person who is appointed a Whistleblower Protection Officer cannot be appointed a Whistleblower Investigations Officer in relation to the same matter.

Role	Responsibilities
Board and Directors	<ul style="list-style-type: none"> • Overall responsibility for this policy, including its approval. • Receive Whistleblower disclosures and forwarding the details onto the Whistleblower Investigations Officer or Speak Up Program Manager. • If receiving a disclosure, ensure the matter remains confidential.
Policy Owner, meaning: <ul style="list-style-type: none"> • EGM for Legal and Compliance 	<ul style="list-style-type: none"> • Ensure the policy is maintained, including it addresses relevant obligations. • Manage the process for updating the policy in accordance with the review timing outlined in this policy. • Oversee the Whistleblower reporting to the Internal Risk Committee, Board Audit Committee and Board, where appropriate. • Policy assurance and overseeing the Speak Up Program. • Ensure the policy is widely disseminated to and easily accessible by disclosers within and outside the organisation.

Role	Responsibilities
<p>ExCo Member (including Head of Internal Audit and Head of Compliance), meaning:</p> <ul style="list-style-type: none"> Person occupying a position on the Executive Committee of Youi 	<ul style="list-style-type: none"> Receive Whistleblower disclosures and forward the details onto the Whistleblower Investigations Officer or Speak Up Program Manager. If receiving a disclosure, ensure the matter remains confidential. Implementation and communication of this policy.
<p>Speak Up Program Manager, meaning:</p> <ul style="list-style-type: none"> Investigations Manager, who reports to the EGM for Legal and Compliance, and is specifically tasked with co-ordinating and managing the Speak Up Program. 	<ul style="list-style-type: none"> Manage the Speak Up Program. Receive Whistleblower disclosures. If receiving a disclosure, ensure the matter remains confidential. Review disclosures to decide if an investigation needs to be conducted for the Allegation(s). Assessment of disclosure: refer Section 5.4 Investigation: refer Section 5.5 Day to day management of the external hotline vendor. Co-ordinate the Speak Up training program for Eligible Recipients, service providers and anyone involved in managing and investigating Whistleblower Disclosures, ensuring that they are aware of their responsibilities to maintain confidentiality, address the risks of Detrimental Conduct, manage conflicts and ensure fairness when managing the performance of, or taking other action relating to a Disclosure. Monitor the effectiveness of the Speak Up Program.
<p>Whistleblower Investigations Officer, meaning:</p> <ul style="list-style-type: none"> EGM for Legal and Compliance Speak Up Program Manager Any other Staff Member or external investigator determined by the EGM for Legal and Compliance to be appropriately skilled to investigate the disclosure. 	<ul style="list-style-type: none"> Receive Whistleblower disclosures. If receiving a disclosure, ensure the matter remains confidential. Assessment of disclosure: refer Section 5.4 Investigation: refer Section 5.5 Negotiation, selection and management of the supplier relationship with the external hotline vendor. Selection and management of the supplier to provide the specialist training program for those

Role	Responsibilities
	<p>involved in managing and investigating Whistleblower Disclosures.</p> <ul style="list-style-type: none"> • Oversee the Speak Up Program and the triage / assessment of Whistleblower Disclosures. • Oversee the management of a secured central repository for recording Whistleblower Disclosures.
<p>Whistleblower Protection Officer, meaning:</p> <ul style="list-style-type: none"> • Head of Compliance • Speak Up Program Manager (if not involved in the investigation) • Any other Staff Member determined by the Head of Compliance to be appropriately skilled to protect the Whistleblower. 	<ul style="list-style-type: none"> • Receive Whistleblower disclosures and forwarding the details onto the Whistleblower Investigations Officer or Speak Up Program Manager. • If receiving a disclosure, ensure the matter remains confidential. • Work with you to understand and manage any risk of Detrimental Conduct being made against you; • Seek to deter any Detrimental Conduct or threats of the same(with punishment for those found to have committed such acts); • Ensure your workplace arrangements are appropriate and safe while a matter is being investigated; and • Protect your identity and information likely to lead to your identification. • Protection: refer Section 5.3 • Support: refer Section 5.7 • Escalations: refer Section 5.8

7. Related Legislation and Documents

7.1 This Policy aims to align with the following legislation / regulations / standards:

- Australia: Corporations Act 2001
- Australia: Taxation Administration Act 1953
- New Zealand: Protected Disclosures Act 2000
- South Africa: Protected Disclosures Act 2000

8. Approval and Review

- 8.1 This Policy is approved by the Board.
- 8.2 The Policy is required to be reviewed biennially or whenever material changes occur.
- 8.3 Where minor amendments are required to this Policy, these changes can be approved by the Document Owner and noted by the Document Approver through standard business reporting. Minor amendments are amendments that relate to formatting, typographic errors, position / title / name changes or clarifications that do not alter the intent or possible interpretation of a policy statement.

9. Document Control

9.1 Identification and approval

Document Name (Id)	Whistleblower Policy
Document Owner	Executive General Manager for Legal and Compliance
Document Approval	Board
Classification	A
Review Cycle	Biennial
Audience	Staff – all

9.2 Revision history

Version	Date created	Drafted by	Reviewed by	Comments
9.0	10/11/2022	Russell Mills	Board	Approved
10.0	13/01/2023	Russell Redsell		Approved (minor amendments)

9.3 Approval history

Approved by	Version tabled	Version approved	Date approved
Board Risk Committee	5.1	5.1	01/11/2018
Board Risk Committee	6.1	6.1	06/11/2019
Board	6.1	7.0	15/11/2019
Internal Risk Committee	7.2	7.2	27/04/2021
Board Audit Committee	7.2	7.2	13/05/2021
Board	7.2	8.0	14/07/2021
Internal Risk Committee	8.1	8.1	02/08/2022
Board Audit, Actuarial & Finance Committee	8.1	8.1	10/11/2022
Board	8.1	9.0	10/11/2022
Executive General Manager for Legal & Compliance	10.0	10.0	18/01/2023

10. Attachment A

10.1 How to raise concerns, including Reportable Conduct

Youi operates a Speak Up Program that is available for people to raise issues impacting their role, their wellbeing at work, or Youi, including Reportable Conduct.

Internal channels available

- Reportable Conduct

To raise and report issues of Reportable Conduct and for the protections under this policy to apply, you may raise a report internally with the Speak Up Program Manager, EGM for Legal and Compliance, Head of Compliance, Head of Internal Audit, your ExCo Member, a Member of the Board, or use the external Speak Up hotline.

- Workplace grievances

Grievances that relate to personal grievances, discrimination or harassment should be raised directly with your Manager, ExCo member, or HR. Former employees who do not have access to these resources can raise issues through the Speak Up hotline and the report will be referred to HR.

- Customer complaints

Matters that relate to customer complaints, should be raised with an Advisor or the Internal Disputes Resolution team.

- Risk and compliance incidents

Risk and compliance issues can be raised via your Manager or reported as a Risk Incident. If you are worried you may suffer personal disadvantage, or wish to use the protections under this policy, please lodge your report directly to the Speak Up Program Manager, EGM for Legal and Compliance, Head of Compliance, Head of Internal Audit, your ExCo Member, a Member of the Board, or use the Speak Up hotline.

External channels available

The external Speak Up hotline is a dedicated service managed by an external vendor, Core Integrity, on behalf of Youi. Anonymous reporting is available through this reporting channel. The Core Integrity hotline can be contacted as follows:

- Speak Up hotline (phone)
 - Australia – 1800 324 775
 - New Zealand: +61 2 9053 9289
 - South Africa: online only

- Speak Up hotline (online)
 - Email: speakup@coreintegrity.com.au
 - Website: grs.ly/YouiSpeakUp
 - Click on the below QR Code to link up to the Core Integrity – Youi Portal



- Speak Up hotline (post)
 - Youi Speak Up Hotline, PO Box 730, Milsons Point, NSW 1565

You also reserve the right to lodge your Disclosure of Reportable Conduct with a government agency, law enforcement body or a regulator in accordance with any relevant law, regulatory or prudential standard applicable to jurisdictions in which Youi operates.