



Whistleblower Policy

/ Prepared July 2020

Summary

At Youi, we pride ourselves on listening. Because if someone feels like they're being listened to, they feel like they matter, and that they're taken seriously. It's this philosophy that's core to our Whistleblower Policy. We hope it gives you the confidence you need to comfortably and confidentially speak up about any conduct you may be concerned about.

Purpose

- Youi is committed to encouraging a strong culture of 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 they customers, colleagues or suppliers.
- Youi encourages you to speak up if you observe or suspect conduct that concerns you.
- Youi will support you throughout the process of raising a concern using our Speak Up Program. In accordance with this policy, we will not tolerate any form of retaliation or victimisation as a result of you speaking up.
- The aim of this policy is to provide clarity on how Youi supports you throughout the process of speaking up, so that you:
 - Feel encouraged to express your concerns.
 - Know how best to express your concerns.
 - Know what will happen when you express your concerns.
 - Feel safe in expressing your concerns.

Scope and audience

- This policy applies to the Youi Group, and includes all current and former Youi employees, officers, directors, contractors, service providers, auditors, or a relative or dependent of these individuals or their spouse, across all Youi locations and operations.
- All Youi employees are required to abide by the Whistleblower Policy.



Policy statements

- We are committed to fostering a culture where people feel safe to speak up about matters that concern them.
- If you do raise a concern, we will support you through the Speak Up Program.
- 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. We investigate and record all concerns fairly, objectively and confidentially.
- You will have access to Youi's confidential counselling service (EAP), available to all current or former Employees (or an immediate family member thereof).
- 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.
- We will not tolerate any form of retaliation or victimisation as a result of you speaking up in accordance with this policy.
- 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.
- 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.



Process and procedure

- 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.
- 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.
- All information received from you will be treated confidentially and sensitively.
- 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).
- 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.
- 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.
- 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.
- Youi strictly prohibits any form of Detrimental Conduct (Refer terms and definitions Section 3) against you as a result of you making a disclosure.
- Youi will take reasonable steps to protect you from Detrimental Conduct and will take action considered appropriate if such conduct is identified.
- 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.
- 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.
- Investigations will follow a fair process, be conducted in as timely manner as the circumstances allow and be independent of the person(s) about whom an Allegation has been made.
- If you are a current or former Employee (or an immediate family member thereof), you may access Youi's confidential counselling service, Employee Assistance Program (EAP). Current and former Employees may also request additional support from the Whistleblower Protection Officer if required.
- You should immediately inform the Whistleblower Protection Officer if you are concerned that:
 - You may be, are being, or have been subjected to Detrimental Conduct ; or
 - 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.



Process and procedure (cont.)

- 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.
- You may request that the Whistleblower Protection Officer escalate your concerns to the Chair of the Board Risk Committee if you are not satisfied with the:
 - Findings of the investigation; or
 - Decision of the Whistleblower Investigations Officer not to investigate.
- If you make such a request, you may provide the Whistleblower Protection Officer with a written submission to be sent to the Board Risk Committee Chair setting out your concern. When considering the request, the Board Risk Committee Chair is not required to reopen or reinvestigate the matter.



Making a report

- Reportable conduct means any conduct in relation to Youi that is:
 - 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.
- Reportable Conduct does not include 'personal work-related grievances'. For example, an interpersonal conflict between Staff Members.

Internal channels available

Reportable conduct

- To raise and report issues internally of Reportable Conduct and for the protections under this policy and the Corporations Act to apply, you may raise a report with your ExCo Member, the Speak Up Program Manager, Head of Investigations, Head of Compliance, or use the 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, Head of Investigations, Head of Compliance or use the Speak Up hotline.



Making a report (cont.)

External channels available

The external Speak Up hotline is a dedicated service managed by an external vendor, Core Integrity, on behalf of Youi.

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
- To raise a confidential concern, visit the dedicated website qrs.ly/YouiSpeakUp or scan the QR code below on your smartphone to reach the same destination.



Speak Up hotline (post)

- Youi Speak Up Hotline,
PO Box 895,
Darlinghurst, NSW, 1300

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.