

## Whistleblower Policy

### **This Policy Applies to:**

Income Asset Management Group Ltd and its Subsidiaries

Effective as of 11 November 2021

Income Asset Management Group Ltd

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# WHISTLEBLOWER POLICY



## Version Control

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## Table of Contents

1. Introduction .....	2
2. Purpose .....	2
3. What is Reportable Conduct .....	2
4. Who to Report .....	3
5. Investigation of Reportable Conduct .....	3
6. Protection of Whistleblowers .....	4
7. Amendments to this policy .....	4

## 1. Introduction

The Income Asset Management Group Limited ('Group' or 'IAM') is committed to the highest standards of conduct and ethical behaviour in all of our business activities, and to promoting and supporting a culture of honest and ethical behaviour, corporate compliance and good corporate governance.

The Group Whistleblower Policy (Policy) applies to all employees, who, for the purpose of this Policy, are defined as Group executives, managers, employees, contractors and consultants of the Group.

This Policy has been put in place to ensure employees can raise concerns regarding any suspected or serious wrongdoing (including unethical, illegal, fraudulent or undesirable conduct) involving the Group's business activities without fear of intimidation, reprisal or victimisation.

## 2. Purpose

The Group has established this Policy for the following reasons:

- To encourage employees to report any suspected or serious wrongdoing without the fear of being blamed or discriminated against;
- Outline how the Group will deal with all reports of serious wrongdoing; and
- Outline the steps available to employees to report serious wrongdoing to the Group.

## 3. What is Reportable Conduct

Any employee may make a report under this Policy if they genuinely believe that a Group's employee or other persons who has business dealings with the Group has engaged in conduct that (but not limited to) (Reportable Conduct):

- is dishonest, fraudulent or corrupt activity, including bribery;
- is illegal activity (such as theft, drug sale or use, violence, harassment or intimidation, criminal damage to property or other breaches of State and Federal law);
- is unethical or in breach of the Group's other policies and procedures (such as wilfully breaching the IAM Code of Conduct);
- is potentially damaging to the Group, a Group's employee or third party, such as unsafe work practices, environmental damage, health risks or abuse of the Group's property or resources;
- amounts to an abuse of authority;
- may cause financial loss to the Group or damage the Group's reputation or be otherwise detrimental to the Group's interests;
- involves harassment, discrimination, victimisation or bullying; or
- involves any other kind of serious impropriety.

## 4. Who to Report

The Group has several avenues for making a report if a person becomes aware of an issue or behaviour, which he or she considers reportable conduct:

### Internal Reporting

- (a) An employee may raise the matter / initially discuss the matter with their direct manager in order to determine whether serious wrongdoing has occurred.

This is an opportunity to clarify the concern, ask questions and determine whether the matter falls under this Policy. At all times, these discussions will remain confidential.

A direct manager in receipt of a report must take the matter to a Protected Disclosure Officer.

- (b) Independent disclosure

Stopline is an independent disclosure management service whom staff may contact in a confidential manner to disclose improper or illegal conduct regarding all facets of our operation and conduct with clients. Their duty is to evaluate any disclosure and provide appropriate information management and dispute resolution. You can contact them in various ways, these include:

Website:	<a href="http://iam.stoplinereport.com/">http://iam.stoplinereport.com/</a>
Email:	<a href="mailto:iam@stopline.com.au">iam@stopline.com.au</a>
Telephone:	1300 304 550
Post:	IAM Group c/o Stopline, Locked bag 403, Diamond Creek, VIC 3089
Smart phone application (App):	stopline365
NRS communication:	for hearing impaired

\*Note: A report can be submitted anonymously if an employee does not wish to disclose their identity to the disclosure service.

## 5. Investigation of Reportable Conduct

The Group will investigate all matters reported under this Policy as soon as practicable after the matter has been reported.

A Protected Disclosure Officer may, with the Whistleblower's consent, appoint a person (either internally or externally) to assist in the investigation.

Where appropriate, the Group will keep the Whistleblower informed of the progress and / or outcome of the investigation (subject to considerations of privacy of those against whom allegations are made).

# WHISTLEBLOWER POLICY



The investigation will be conducted in an objective and fair manner, and otherwise as is reasonable and appropriate having regard to the nature of the Reportable Conduct and the circumstances.

## 6. Protection of Whistleblowers

The Group is committed to the protection of all whistleblowers and to ensure confidentiality in respect of all reports raised under this Policy are maintained.

All reasonable steps will be taken by the Group to ensure that a Whistleblower will not be subject to any form of disadvantage, harassment, dismissal or discrimination as a result of making a report.

However, this Policy will not protect any whistleblowers that are involved in or connected to the Reportable Conduct that has been reported.

### (a) Protection of Whistleblower identity

Subject to legal requirements, upon receiving a report under this Policy, the Group will not, nor any manager or Protected Disclosure Officer, disclose any details that would suggest or reveal a Whistleblower's identity, without first obtaining their consent.

Any disclosure that a Whistleblower consents will be disclosed on a strict confidential basis. However, a Protected Disclosure Office is able to disclose to the Australian Securities and Investment Commission (ASIC), the Australian Prudential Regulation Authority (APRA) or the Australian Federal Police, without the consent of the Whistleblower.

### (b) Protection of files and records

All files and records from an investigation will be retained in strict security and any unauthorised release of information to a person and / or entity not involved in the investigation (other than managers or directors who need to be advised in order to take appropriate action, or for corporate governance purposes), without the consent of the Whistleblower, will be in breach of this Policy.

An unauthorised release of information in breach of this Policy will be considered a serious matter and appropriate actions will be taken.

## 7. Amendments to this policy

This Policy will be assessed and updated from time to time to ensure that it remains effective and reflects changes in legislation and other developments. This Policy may be amended, withdrawn or replaced at the sole discretion of the Group.