Investment Group

Registry Services

UNITY FUND SERVICES

Whistle-blower Policy

Enterprise-Wide Policy

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1. Application of Policy

1.1. This Policy applies to the subsidiaries of OIG Holdings Pty Ltd (ACN 616 297 940) and all entities considered to be comprised in the One Investment Group (**OIG**):

(a) in respect of its Corporate Trustee Services business those companies that:

(i) hold an Australian financial services licence (**AFS Licence**) to provide financial services to retail and/or wholesale clients and their OIG Corporate Authorised Representatives (each an **OIG Licensee**)[1]; and
(ii) provide corporate trust and custody services (**OCTS**); and
(iii) provide corporate governance services.

(b) in respect of its Fund Services business, those companies that:

(i) provide fund administration services (**UFS**); and
(ii) provide registry services (**ORS**).

1.2. You are considered an Eligible Whistle-blower if you are, or have been, any of the following[2]:

(a) an officer or employee of OIG (including, but not limited to, current and former employees who are permanent, part-time, fixed-term or temporary, interns, secondees, managers and directors) (**Employees**);

(b) an individual supplier of services or goods to OIG (whether paid or unpaid);

(c) an Employee of an organisation that supplies services or goods to the One Investment Group (whether paid or unpaid) including, but not limited to, current and former contractors,consultants, service providers and business partners);

(d) an associate of OIG;

(e) a relative of an individual referred to in any of paragraphs (a) to (d); or

(f) a dependant of an individual referred to in any of paragraphs (a) to (d), or of that individual's spouse.

1.3. The protections described in this policy apply to Protected Disclosures made to any Eligible Recipient[3].

2. Why OIG has adopted a Whistle-blower Policy

2.1. The One Investment Group considers having a whistleblowing policy[4]:

(a) demonstrates OIG considers any wrongdoing very seriously and is committed to identifying and remedying it;

(b) encourages a culture where wrongdoing can be addressed quickly and before it

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[1] *S.1317AAB Corporations Act 2001*
[2] *S.1317AAA Corporations Act 2001 & ASIC Regulatory Guide RG 270.43*
[3] *RG 270.89*
[4] *RG 270.40*

requires regulatory action or causes damage to OIG's reputation;

(c) ensures individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported;

(d) provides transparency around OIG's framework for receiving, handling and investigating disclosures;

(e) helps deter wrongdoing in line with OIG's risk management and governance framework;

(f) supports OIG's adopted values by reinforcing the high standards of integrity and fair dealing One Investment Group expects all its staff to adhere to and the importance of their duty of confidentiality to OIG and investors;

(g) provides information regarding the rights and obligations of Employees, contractors, and other personnel of OIG under the Whistle Blower Protections;

(h) informs staff that they may make protected disclosures to a suitably trained manager who OIG considers:

(i) realises the seriousness of the situation;
(ii) can make sure allegations are investigated as appropriate; and
(iii) can take steps to limit the potential damage to One Investment Group.

3. Protections available to whistle-blowers

3.1. Protection will be provided to Eligible Whistle-blowers for the disclosure of information made to an Eligible Recipient[5] and where that disclosure is a Protected Disclosure.

3.2. A Protected Disclosure is a disclosure of information where the Eligible Whistle-blower has reasonable grounds to suspect, that the information concerns misconduct or an improper state of affairs or circumstances in relation to OIG or a Group entity.

3.3. A Protected Disclosure can include the disclosure of information made where the Eligible Whistle-blower has reasonable grounds to suspect that the information indicates that any OIG Employee has engaged in conduct which:

(a) amounts to an offence or contravention of Relevant Law[6]; or

(b) represents a danger to the Australian public or Australian financial system

3.4. A Protected Disclosure may include the disclosure of information relating to the following kinds of wrongdoing:

(a) Illegal conduct, such as theft, dealing in, or use of illicit drugs, violence or threatened violence, and criminal damage against property;

(b) fraud, money laundering and misappropriation of funds;

(c) offering or accepting a bribe;

[5] *S.1317AA(2) Corporations Act 2001*
[6] *RG 270.54(a)*

(d) financial irregularities;

(e) failure to comply with, or breach of, legal or regulatory requirements; and

(f) engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made, or be planning to make, a disclosure.

3.5. Protected Disclosures can relate to wrongdoing that may not relate to a particular contravention of law, for example[7]:

(a) disclosure of information that indicates a significant risk to public safety or the stability of, or confidence in the financial system;

(b) misconduct by OIG officers and employees or an improper state of affairs brought about by or contributed to by them; and

(c) to information regarding emerging forms of misconduct not covered under existing law such as exploitation of a loophole in the law that creates vulnerability in a government program.

3.6. Protection will also be provided where you disclose information to your legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of the Whistle-blower Protections[8]. Protection is still available where the legal practitioner concludes that the disclosure does not relate to a disclosable matter[9].

3.7. Unless the One Investment Group determines that the issue disclosed would have significant implications for OIG, whistle-blower protection is not available in relation to personal work-related grievances[10] including:

(a) an interpersonal conflict between the discloser and another employee;

(b) a decision relating to the engagement, transfer or promotion of the discloser;

(c) a decision relating to the terms and conditions of engagement of the discloser or otherwise does not involve a breach of workplace laws; and

(d) a decision to suspend or terminate the engagement of the discloser, or otherwise to discipline the discloser[11].

3.8. A personal work-related grievance may still qualify for protection where:

(a) it includes information about misconduct, or information about misconduct is included or is accompanied by a personal work-related grievance (a mixed report);

(b) OIG has breached employment or other laws punishable by imprisonment for a period of 12 months or more;

(c) OIG has engaged in conduct that represents a danger to the public;

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[7] *RG 270.54(c) and RG 270.56*
[8] *S.1317AA(3) Corporations Act 200, RG 270.63(d) & RG 270.72*
[9] *RG 270.72*
[10] *S.1317AADA Corporations Act 2001 & RG 270.58*
[11] *RG 270.61*

(d) it relates to information that suggests misconduct beyond your personal circumstances;

(e) you suffer from or are threatened with detriment for making a disclosure; or

(f) you seek legal advice or legal representation about the operation of the whistle-blowers protections under the Corporations Act[12].

3.9. If you make a Protected Disclosure, you will not be subject to any civil, criminal or administrative liability or contractual right or remedy for making that disclosure and the information disclosed is not admissible against you in criminal or civil penalty proceedings[13]. You will still qualify for protection even if your disclosure turns out to be incorrect[14]. You will not, however, be considered to have made a "Protected Disclosure" where you knowingly provide false information[15].

3.10. Examples of the types of information that might be considered as a Protected Disclosure include those set out in Section 3.4 above[16]:

(a) A breach of a material aspect of OIG' Risk Management Framework (including the relevant Compliance Management System) or malfeasance of any kind including fraud, negligence or wilful default by a member of OIG's staff;

(b) information relating to a conflict of interest that has not been disclosed to OIG (for example a conflict between the interests of a member of staff and investors in a fund);

(c) a member of OIG's staff asking for a kick-back or other facilitation payment to secure your appointment as a service provider to OIG; or

(d) persistent breaches of an OIG supply agreement that does not appear to have been actioned appropriately.

4. Making a Protected Disclosures

4.1. You must make a disclosure to an Eligible Recipient to qualify for protection as a whistle-blower under the Corporations Act[17].

4.2. Protected Disclosure may be made to any the following Eligible Recipients[18]:

(a) an Executive Director or a director of OIG Holdings;

(b) a member of the Compliance Committee[19];

(c) an auditor, or a member of an audit team conducting an audit, of any Scheme operated by an OIG Licensee or an OIG entity;

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[12] *RG 270.63*
[13] *RG 270.104*
[14] *RG 270.57*
[15] *See also section 6.2 of this Policy.*
[16] *RG 270.55*
[17] *RG 270.67*
[18] *s.1317AAC Corporations Act 2001 & RG 270.69*
[19] *Compliance Committee Members are not "Eligible Recipients" under the Act but OIG considers their inclusion is appropriate.*

(d) your legal practitioner for the purposes described in section 3.2 above, and

(e) ASIC (or, if relevant APRA)[20].

4.3. If the disclosure is made to ASIC or your legal practitioner they will determine the format for disclosure. To lodge a report with ASIC, visit their website and follow the whistle-blower/ reporting misconduct links.

Internal Protected Disclosures

4.4. Where the disclosure is made to any OIG Eligible Recipient, the disclosure may be made orally or in writing. Where the disclosure is made orally, the Eligible Recipient should take notes of the discussion and provide the Eligible Whistle-blower with a copy of the notes for them to confirm their accuracy.

4.5. OIG's Eligible Recipients can be contacted to make a disclosure anonymously/confidentially, securely and outside of business hours using any of the following methods[21]:

(a) in person (you can't remain anonymous if you use this method);

(b) by mailing or leaving at OIG's head office a sealed envelope marked "*Private and Confidential*" addressed to the relevant Eligible Recipient;

(c) by telephone (use the internal directory or details contained on OIG's website); or

(d) by email (using OIG's internal directory).

4.6. The written record of the Protected Disclosure should be as detailed as possible for example it should include:

(a) the names of any One Investment Group staff involved in the matter;

(b) dates and times of when the questionable conduct was observed (if relevant);

(c) specific details of any questionable transactions and the parties involved;

(d) whether there were any witnesses to the questionable conduct; and

(e) copies of or the location of any documents evidencing the information relevant to the Protected Disclosure.

4.7. An Eligible Whistle-blower may make a Protected Disclosure to an Eligible Recipient anonymously[22]. You can choose to remain anonymous while making the disclosure, over the course of the investigation and after the investigation is finalised[23]. OIG will protect anonymity through[24]:

(a) not storing any information in relation to the Protected Disclosure on a drive or in a folder that is accessible to people that are not Eligible Recipients; and

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[20] *RG 270.73*
[21] *RG 270.80 to 270.82*
[22] *RG 270.83*
[23] *RG 270.84*
[24] *RG 270.86*

(b) avoiding as far as possible, providing people with information sufficient to identify the Eligible Whistle-blower as the source of the Protected Disclosure.

4.8. Making an anonymous disclosure may limit the effectiveness of an investigation as the investigator will not be able to ask questions of the discloser[25]. OIG considers the process is enhanced where Eligible Whistle-blowers maintain ongoing two-way communication with OIG so that the relevant Eligible Recipient can ask follow-up questions or provide feedback[26].

External Protected Disclosures

4.9. While OIG expects that all staff will first bring their concerns to an OIG Eligible Recipient, OIG recognises that in some limited situations, wrongdoing may be of such gravity and urgency that disclosure to the media or a parliamentarian is justified. Public interest and emergency disclosures to a member of parliament or a professional journalist (but not a social media commentator, blogger) will qualify as a Protected Disclosure where:

(a) a Protected Disclosure has already been made to a regulatory body (such as ASIC, APRA or another Commonwealth body prescribed by regulation), but the Eligible Whistle-blower has no reasonable grounds to believe that any action is being taken to address the conduct or state of affairs in question;

(b) in the case of a public interest disclosure, at least 90 days must have passed since the previous disclosure to ASIC (or APRA)[27];

(c) the Eligible Whistle-blower has reasonable grounds to believe that it would be in thepublic interest for a further disclosure to be made, or alternatively, that the disclosure concerns a 'substantial and imminent danger' to the health or safety of a person or to the natural environment; and

(d) before making the External Disclosure, the Eligible Whistle-blower first gives the regulatory body written notice that includes sufficient information to identify the previous disclosure and states the Eligible Whistle-blower's intention to make an External Disclosure.

4.10. In relation to disclosure concerning a 'substantial or imminent danger' to the health or safety ofa person or to the natural environment, the extent of the information disclosure should be no greater than is necessary to inform the journalist or parliamentarian of the substantial and imminent danger.

4.11. It is important to understand the criteria for making a public interest or emergency disclosure. You should obtain independent legal advice before making a public interest or emergency disclosure as the consequences of an Eligible Whistle-blower making a non-protected External Disclosure can be significant and detrimental for OIG and/or the Eligible Whistle-blower themselves. OIG strongly encourages any potential Eligible Whistle-blowers to first talk to only to their legal adviser about the protections and process applicable under the Whistle-blower Protections before making an External Disclosure.

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[25] *RG 270.119*
[26] *RG 270.84*
[27] *RG 270.77*

5. How will OIG investigate a Protected Disclosure?[28]

5.1. Where the Eligible Recipient is a member of OIG, they will assess within 4 business days whether the disclosure:

(a) is a Protected Disclosure; and

(b) requires a formal, in-depth investigation.

5.2. The OIG Eligible Recipient will either investigate the matter themselves or arrange for the matter to be investigated by engaging either an internal or external investigator.

5.3. An investigator appointed by OIG will gather all available information using any of the following methods:

(a) review any available information (including information provided);

(b) interview any relevant person; and

(c) engage an external adviser (e.g. lawyer or accountant).

5.4. The objectives of the investigation are to:

(a) collate information relating to the Eligible Disclosure;

(b) consider the information collected; and

(c) provide the Board or the Compliance Committee (as applicable[29]) a written report on the investigator's findings in relation to the Eligible Disclosures and the investigator's recommended course of action[30].

5.5. The initial investigation for completing the objectives as stated above should be completed in 10 business days. Any further investigation or action should be conducted within a reasonably prompt timeframe as necessary.

5.6. In conducting their investigation, the investigator must:

(a) observe the rules of "natural justice" including, for example, providing a fair opportunity to respond to any person against whom an allegation is made as part of the Eligible Disclosure (unless there is a compelling reason not to, such as physical danger to any person);

(b) conduct the investigation without bias; and

(c) maintain confidential written records of their investigation (the method for documenting and reporting the findings will depend on the nature of the disclosure).

5.7. In conducting the investigation, the investigator must keep relevant Eligible Whistle-blowers

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[28] *RG 270.111*

[29] *It may be appropriate for the investigator to report to the Compliance Committee where Eligible Disclosure relates to an act or omission of the Board or any Director on the Board.*

[30] *RG 270.123*

appropriately[31] informed of the progress of their investigation and when the investigation has been completed. The outcome of the investigation will only be disclosed to the Eligible Whistle-blower at OIG's discretion. At the end of the investigation, the investigator must provide to the Eligible Whistle-blower a written report on their findings which may be the full report provided to the Board or a summary of it[32]. The frequency and timeframe of contact with the Eligible Whistle-blower may vary depending on the nature of the disclosure. The information provided is subject to:

(a) any circumstances where it may not be appropriate to provide details of the outcome to the Eligible Whistle-Blower (including observing the privacy of others involved in the investigation); and

(b) whether the Eligible Whistle-blower can be contacted, including through anonymous channels.

5.8. OIG has a legal obligation to protect the confidentiality of an Eligible Whistle-blower[33]. The investigator must not disclose the identity of the Eligible Whistle-blower but may disclose information relating to the disclosure where it is reasonably necessary to their investigation and they take reasonable steps to reduce the risk that the Eligible Whistle-blower will be identified by the information disclosed[34]. OIG will protect the confidentiality of an Eligible Whistle-Blower's identity through but not limited to:

(a) the secure storage of physical documents containing information pertaining to the Protected Disclosure;

(b) the storage of electronic documents containing information pertaining to the Protected Disclosure on the investigator's desktop, and not on the OIG Network;

(c) exclusive access to the Eligible Recipient and investigator's emails;

(d) where possible, all personal information or reference to the Eligible Whistle-blower witnessing anevent will be redacted;

(e) where possible, the Eligible Whistle-blower will be contacted to help identify certain aspects of their disclosure that could inadvertently identify them;

(f) disclosures will be handled and investigated by qualified staff;

(g) access to all information relating to a disclosure will be limited to those directly involved in managing and investigating the disclosure; and

(h) only a restricted number of people who are directly involved in handling and investigating a disclosure will be made aware of a Eligible Whistle-blower's identity (subject to the Eligible Whistle-blower's consent) or information that is likely to lead to the identification of the Eligible Whistle-blower.

5.9. The investigator may disclose information to obtain legal advice or representation in relation

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[31] Only those Eligible Whistle-blowers who have identified themselves as part of the Eligible Disclosure are able to be updated. There may be limits to the information that can be shared for example duties of confidentiality owed to others and questions of legal privilege.

[32] RG 270.123

[33] RG 270.91

[34] RG 270.93 & RG 270.118

to the operation of the Whistle-blower Protections including whether the investigator may obtain legal advice on the subject matter of the disclosure (for example in the case of serious misconduct or reports regarding compliance and regulatory breaches).

5.10. All OIG Staff must cooperate with the investigation and keep confidential both the fact they have participated in the investigation and the subject matter discussed with them during the investigation. Any OIG staff member who reveals the existence of an investigation or any information in relation to the investigation may be subject to disciplinary action.

5.11. It is illegal for any person to identify an Eligible Whistle-blower, or disclose information that is likely to lead to the identification of the Eligible Whistle-blower unless it is:

(a) to ASIC, APRA, or a member of the Australian Federal Police;

(b) to a legal practitioner (for the purposes of obtaining legal advice);

(c) to a person or body prescribed by regulations; or

(d) with the consent of the Eligible Whistle-blower [35].

5.12. If an Eligible Whistle-blower considers the duty of confidence owed to them has been breached they may lodge a complaint with their choice of[36]:

(a) OIG's Head of Risk & Compliance;

(b) any director of an OIG Licensee; or

(c) any member of the Compliance Committee.

6. How will OIG ensure fair treatment of employees?

6.1. OIG strives to ensure the fair treatment of all its employees including by[37]:

(a) conducting any investigation in the manner described above;

(b) ensuring the confidentiality of the Eligible Whistle-blower where disclosure is not required or authorised by law[38];

(c) considering whether it is appropriate to offer the Eligible Whistle-blower paid leave during the investigation;

(d) monitoring the behaviour of any OIG staff who may be associated with the Eligible Disclosure and managing any adverse behaviour identified; and

(e) subject to Section 6.2, ensuring that no employee who is an Eligible Whistle-blower is subject to any detrimental acts or omissions[39] resulting from the Eligible Disclosure including:

(i) dismissal of an employee;

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[35] *RG 270.94*
[36] *RG 270.94*
[37] *RG 270.109 & RG 270.125*
[38] *RG 270.90*
[39] *RG 270.95*

(ii) harm or injury of an employee in their employment including psychological harm;
(iii) disadvantageous alteration of an employee's position or duties;
(iv) any form of harassment, bullying or discrimination; or
(v) damage to a person's property, reputation, business or financial position; or
(vi) any other damaged to a person[40].

6.2. Detrimental acts or omissions do not include OIG taking reasonable steps to:

(a) protect the Eligible Whistle-blower from harm including administrative steps or office moves; and

(b) manage an Eligible Whistle-blower unsatisfactory work performance in accordance with the procedures set out in OIG's Employee Handbook[41].

6.3. OIG has implemented measures and mechanisms for protecting Eligible Whistle-blowers from detrimental acts or omissions including:

(a) processes for ensuring that management are aware of their responsibilities to maintain the confidentiality of a disclosure, address the risks of isolation or harassment, manage conflicts and ensure fairness when managing the performance of, or taking other management action relating to a discloser;

(b) processes for assessing the risk of detriment against a discloser and other persons;

(c) strategies to help a discloser minimise and manage stress, time or performance impacts, or other challenges resulting from the disclosure or its investigation; and

(d) interventions for protecting a discloser if detriment has already occurred.

6.4. If an employee-Eligible Whistle-blower has been involved in the matters that are the subject of an Eligible Disclosure, they may be subject to disciplinary action in respect of their role. Although the act of making an Eligible Disclosure cannot protect an Eligible Whistle-blower from disciplinary or remedial action where they have been involved in the matters that are the subject of the Eligible Disclosure, it may be taken into account and may mitigate any action that may lawfully be taken against the employee-Eligible Whistle-blower[42].

6.5. An Eligible Whistle-blower can seek compensation and other remedies through the courts if:

(a) they suffer loss, damage or injury due to a disclosure; and

(b) OIG has failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct[43].

7. Access to this policy and additional information

7.1. This policy will be made available to officers and employees of the One Investment Group by

[40] *RG 270.99*
[41] *RG 270.100*
[42] *RG 270.105*
[43] *RG 270.102*

being posted to the OIG Intranet. This policy will also be made available to external disclosers by being uploaded to OIG's website[44].

7.2. Additional information can be obtained prior to formally making a Protected Disclosure[45] by contacting OIG's Head of Legal or Head of Risk & Compliance or on ASIC's website.

8. Training and Compliance

8.1. The implementation of (including training on) and monitoring of compliance with this policy is undertaken in accordance with the *Enterprise-Wide Risk Management Framework*.

8.2. Compliance with this policy is mandatory and any actual non-compliance must be reported and assessed through the normal incident/ breach reporting process relevant to the member of staff involved. Any deliberate act of non-compliance by any employee may result in disciplinary action.

9. Review of Policy

9.1. This policy will be reviewed at the intervals and in the manner described in the *Enterprise-Wide Risk Management Framework*.

10. Other relevant OIG Policies

10.1. In addition to the *Enterprise-Wide Risk Management Framework*, another OIG relevant policy is OIG's *Code of Conduct.*

11. Dictionary and Interpretation

11.1. In this policy, a reference to a person performing an act, for example *Director, Trustee Services*, that person may delegate the performance of the relevant act to another, for example *Manager, Trustee Services* provided they adequately supervise their delegate.

11.2. In addition to the terms defined in the *Enterprise-Wide Risk Management Framework*, when used in this policy, the following capitalised terms have the meanings set out below:

Term	Meaning
Eligible Recipient	Has the meaning given to that term in Section 4 of this Policy.
Eligible Whistle-blower	Has the meaning given to that term in Section 1.2 of this Policy.
Employees	An officer or employee of OIG including, but not limited to, current and former employees who are permanent, part-time, fixed-term or temporary, interns, secondees,managers and directors.
Protected Disclosure	Has the meaning given to that term in Section 3 of this Policy.

[44] *RG 270.128*
[45] *RG 270.66*

Relevant Law	(i) the Corporations Act 2001; (ii) the ASIC Act 2001; (iii) the Banking Act 1959; (iv) Financial Accountability Regime Act 2023; (v) the Financial Sector (Collection of Data) Act 2001; (vi) the Insurance Act 1973; (vii) the Life Insurance Act 1995; (viii) the National Consumer Credit Protection Act 2009; (ix) the Superannuation Industry (Supervision) Act 1993 or any other Commonwealth offence that carries a penalty of at least 12 months imprisonment (for example Anti-Money Laundering and Counter Terrorism Financing Act or Anti-bribery Legislation).
Whistle-blower Protections	Protections contemplated under the Corporations Act 2001 (Cth), as amended by the Treasury Laws Amendment (*Enhancing Whistleblower Protections*) Act 2019 (Cth)