



Whistleblower Policy

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Document Reviewer

Name	Position	Date
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Karishma Kumar, Stephen Blyth, Nathan Shepherd	Director, People & Culture, Privacy Compliance Officer, Chief Legal Officer	01.03.2022

Document Sign-off

Name	Position	Signature	Date
Julian Dodman	Chief Financial Officer		03.12.2019
Nathan Shepherd	Chief Legal Officer		14.03.2022

1. Introduction

1.1 What is this Policy for?

This Whistleblower Policy (“this **Policy**”) documents the illion Group of Companies (“**illion’s**”) commitment to maintaining a working environment that encourages Eligible Whistleblowers to speak up about “**Reportable Conduct**” (as defined below) without being subject to retribution, victimisation, harassment and/or discriminatory treatment.

illion is committed to address all Whistleblower disclosures in a manner that is fair, prompt, sensitive and confidential (to the extent possible) and provide the appropriate protections to those involved in any Whistleblower complaint process.

This Policy aims to:

- encourage Eligible Whistleblowers (as defined below) to promptly report Reportable Conduct if they have reasonable grounds to do so;
- outlines how illion will deal with and investigate Reportable Conduct;
- sets out the avenues available to Eligible Whistleblowers to report Reportable Conduct; and
- sets out how illion will afford fair treatment to Whistleblowers and any person who is involved in a Whistleblowing disclosure.

This Policy aligns with illion’s values and principles of conduct and should be read in conjunction with the illion Code of Conduct and other relevant illion policies.

This Policy does not cover the reporting of matters that are generally regarded as Personal Work-Related Grievances (see section below). Any Personal Work-Related Grievances should be reported to your direct line Manager or the People & Culture Team in accordance with the Team Member Issues Resolutions Policy or other applicable illion policy.

2. Scope and Application

2.1 To whom does this Policy apply?

This Policy applies to the illion and of all of its business units and covers Eligible Whistleblowers (as defined below). Any Eligible Whistleblower may raise concerns regarding Reportable Conduct under this Policy.

An “**Eligible Whistleblower**” includes all current and past illion:

- officers (including directors and company secretaries);
- employees;
- Associates (as defined in the Corporations Act) including directors and company secretaries of any illion Related Body Corporate;
- contractors, suppliers of good or services (and their current and former employees); and
- relatives and dependents of any of the above.

2.2 Who is responsible for this Policy?

The illion Chief Legal Officer has overall responsibility for this Policy which includes policy development, policy review and the implementation of the Policy objectives.

Should illion employees require further information regarding this Policy please contact your Manager, the illion People & Culture Team or the illion Chief Legal Officer. Any external requests for further information regarding this Policy should be addressed to the People & Culture Team or the illion Chief Legal Officer.

3. Reportable Conduct

3.1 What matters should be reported?

illion encourages and relies on Eligible Whistleblowers who are aware or suspect Reportable Conduct (as defined below) to promptly report any Reportable Conduct and follow the processes set out in this Policy. In order to make a disclosure under this Policy, Eligible Whistleblowers must have reasonable grounds to suspect that there is or has been Reportable Conduct, meaning there must be some supporting information for the suspicion, and not a mere allegation.

“**Reportable Conduct**” includes the types of conduct or information that may be reported under the *Corporations Act 2001* (Cth) (Corporations Act) and the *Taxation Administration Act 1953* (Cth) (Taxation Administration Act) (“**Acts**”) or under this Policy being:

- any misconduct or an improper state of affairs or circumstances in relation to illion or a Related Body Corporate of illion (examples include, but not limited to, fraudulent activity, dishonest or corrupt behaviour, mismanagement of company resources, conduct endangering health or safety, concealment of wrongdoing);
- conduct where a Whistleblower has reasonable grounds to suspect that illion or a Related Body Corporate of illion or its employees, directors, officers, suppliers, customers or contractors have engaged in conduct or alleged conduct which:
 - represents a danger to the public or the financial system;
 - constitutes an offence against any Commonwealth Act that is punishable by imprisonment for a period of 12 months or more;
 - constitutes an offence or contravention of Relevant Acts (as defined below); or
 - is otherwise prescribed by regulations under Relevant Acts to be Reportable Conduct; and
- information which may assist illion in performing functions or duties relating to its tax affairs.

“**Relevant Acts**” means the Corporations Act, the Australian Securities and Investments Commission Act 2001, the Banking Act 1959, the Financial Sector (Collection of Data) Act 2001, the Insurance Act 1973, the Life Insurance Act 1995, the National Consumer Credit Protection Act 2009, the Superannuation Industry (Supervision) Act 1993, Competition and Consumer Act 2010, the Taxation Administration Act 1953, other tax laws administered by the Federal Commissioner of Taxation, any other Commonwealth law that is punishable by imprisonment for a period of 12 months or more. Reportable Conduct can relate to conduct of third parties, such as customers, suppliers or services providers.

Reportable Conduct does not need to involve a contravention of a particular law. For example, information that indicates a significant risk to public safety or the stability of, or confidence in, the financial system, is also Reportable Conduct, even if it does not involve a breach of any particular law.

This Policy does not cover “**Personal Work-Related Grievances**” which means and includes any matter relating to the discloser’s employment or former employment which has or tends to have implications for the discloser personally, including but not limited to:

- interpersonal conflict between a discloser and another employee;
- decisions relating to the engagement, transfer or promotion of the discloser;
- decisions relating to the terms and conditions of engagement of the discloser; or
- decisions relating to the disciplinary treatment, suspension or termination of employment/engagement of the discloser.

However, Personal Work-Related Grievances may be Reportable Conduct and may qualify for protection where:

- the disclosure of the grievance has significant implications for illion and also includes information about Reportable Conduct;
- the Eligible Whistleblower suffers from (or is threatened with) detriment for making a disclosure or assisting in the investigation of a disclosure;
- is a mixed report that includes Reportable Information and a Personal Work-related Grievance; or
- relates to information suggesting misconduct beyond the Eligible Whistleblower’s circumstances.

A disclosure which does not relate to Reportable Conduct will not qualify for protection under the Corporations Act or, in relation to illion’s tax affairs, the Taxation Administration Act (“the **Acts**”). However, a disclosure made to a legal practitioner for the purposes of obtaining legal advice will always be protected under the Acts.

4. How, who and when to report

4.1 Reporting – to whom?

Eligible Whistleblowers can make a disclosure of Reportable Conduct to any of the eligible recipients mentioned below (“**Eligible Recipient**”).

1. **Independent Reporting and Whistleblower Service - Deloitte**

It is encouraged in the first instance for an Eligible Whistleblower to make a disclosure via the independent and external “Reporting and Whistleblower Service” which is managed by Deloitte Touche Tohmatsu Limited (“**Deloitte**”). The Reporting and Whistleblower Service is available 24 hours a day/365 days a year and offers a number of channels as detailed in the table below for an Eligible Whistleblower to use. Deloitte will put together a report based on the information disclosed by an Eligible Whistleblower for each disclosure that comes through the Reporting and Whistleblower Service and disclosures can be made anonymously if the Eligible Whistleblower prefers.

Reporting and Whistleblower Service Channels		
Telephone	Reporting and Whistleblower HotLine Australia: 1800 952 973 New Zealand: 0800 848 522 UK: 0808 189 1425	This is a toll free number
OnLine Platform	www.illionreportingandwhistleblower.deloitte.com.au	The online platform can be accessed via a computer or a smart phone
Email	illionreportingandwhistleblower@deloitte.com.au	Recommended that any disclosure sent by email is marked 'confidential' and subject line includes reference to:

		Deloitte Whistleblower and Reporting Service c/illion
Mail	Deloitte Whistleblower and Reporting Service c/illion Reply paid 12628 A'Beckett Street, Victoria 8006	This is a reply paid address. Recommended that any disclosure sent by mail is put in an envelope marked 'confidential' and marked to the attention of: Deloitte Whistleblower and Reporting Service c/illion
Fax	+61 3 9691 8182	Recommended that any disclosure sent by fax is marked 'confidential' and marked to the attention of: Deloitte Whistleblower and Reporting Service c/illion

2. Internal Eligible Recipients

If an Eligible Whistleblower does not want to use the Reporting and Whistleblower Service, they can alternatively report Reportable Conduct directly (either orally or in writing) to one of illion's internal Eligible Recipients. illion's internal Eligible Recipients include:

- any of illion's officers (which includes directors and company secretaries);
- illion's senior managers, which includes a person, other than a director or company secretary, who makes, or participates in making, decisions that affect the whole, or a substantial part of illion's business, or has the capacity to significantly affect illion's financial standing, such as any member of the illion Executive Leadership Team;
- illion's internal auditors (if any);
- illion's internal actuaries (if any);
- if the disclosure relates to a tax matter, in addition to any of the above, individuals within illion dealing with tax matters;
- an illion Board member;
- any other senior illion employees appointed from time to time and as communicated by illion.

For illion employees:

- if the issue you want to report is about your manager, a member of the illion Executive Leadership Team or a People & Culture team member, you may report the matter to the illion Chief Legal Officer and/or illion Chief Executive Officer.
- if the issue you want to report is about the illion Chief Legal Officer you may report the matter to the illion Chief Executive Officer and/or the Chair of the illion Board or another Board member.
- if the issue you want to report is about the illion Chief Executive Officer, you may report the matter to the illion Chief Legal Officer and/or the Chair of the illion Board or another Board member.

illion's Eligible Recipients are required to comply with the terms of this Policy, including keeping the identity of the Whistleblower confidential (unless an exception applies) and providing such support as is necessary (including if requested providing a support person) in the conduct of undertaking a Whistleblower investigation.

3. External Eligible Recipients

Eligible Whistleblower may also report Reportable Conduct to the following external Eligible Recipients:

- illion’s auditors (in Australia & New Zealand, KPMG) and registered tax agent (in Australia & New Zealand, Ernst & Young);
- A legal practitioner for the purpose of obtaining legal advice;
- ASIC, APRA or another prescribed Commonwealth authority; or
- Tax related disclosure may also be made to the Australian Taxation Office.

For more detailed information about external Eligible Recipients and reporting please also refer to:

- APRA – for Reportable Conduct relevant to APRA refer to APRA’s Public Interest Disclosure Policy – see link: <https://www.apra.gov.au/become-a-whistleblower-or-make-a-public-interest-disclosure>
- ASIC – for Reportable Conduct relevant to ASIC refer to how ASIC handles whistle-blower reports see link: <https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing>
- ATO – for Reportable Conduct relevant to Tax matters refer to the ATO’s Tax whistle-blowers page see link: <https://www.ato.gov.au/general/gen/whistleblowers/>

Whilst Reportable Conduct may be made to external Eligible Recipients, illion encourages Eligible Whistleblowers to use the Reporting and Whistleblower Service in the first instance as this will allow illion to promptly investigate, action and address the matters raised as part of a Reportable Conduct disclosure.

4.2 Public interest & emergency disclosures – to whom?

A further report may be made to a member of Commonwealth Parliament or a journalist on grounds of public interest and/or emergency, if the following conditions are met:

- the Whistleblower has previously made a disclosure report to ASIC, APRA or another prescribed Commonwealth authority; and
- if not an emergency disclosure, at least 90 days have passed since the date of the Whistleblower’s original report; and
- the Whistleblower does not have reasonable grounds to believe that action is being, or has been, taken in respect of that report and has reasonable grounds to believe that making a further disclosure would be in the public interest (“**public interest disclosure**”); or
- the Whistleblower has reasonable grounds to believe the report concerns a substantial and imminent danger to the health or safety of one or more persons or the natural environment (“**emergency disclosure**”); and
- the Whistleblower has given prior written notice of the intention to make a secondary report to the original recipient of the report.

In such case the Eligible Whistleblower will be entitled to the protections conferred by law and illion will take reasonable steps to ensure that an Eligible Whistleblower is not victimised as a result of making a protected **public interest disclosure** or an **emergency disclosure**.

Before an Eligible Whistleblower makes a public interest disclosure or an emergency disclosure, illion recommends the Eligible Whistleblower first seek independent legal advice to ensure that the disclosure is protected under the Acts.

4.3 Not sure whether to report?

If the Eligible Whistleblower is not sure whether to report Reportable Conduct or not, the Eligible Whistleblower is able to first discuss the matter with an Eligible Recipient before making a disclosure of Reportable Conduct and this discussion can be undertaken anonymously, if the Eligible Whistleblower prefers.

N.B.: A disclosure of Reportable Conduct which is not made via the Reporting and Whistleblower Service provided by Deloitte or directly to an Eligible Recipient identified in this Policy above will not qualify for protection under the Acts.

4.4 Reporting – anonymity

A Whistleblower report can be made anonymously. Eligible Recipients must keep the identity of a Whistleblower confidential at all times (unless an exception applies). An Eligible Whistleblower can choose to remain anonymous while making a disclosure, during the course of the investigation and/or after the investigation is finalised. An Eligible Whistleblower may also consent to partial or full disclosure of their identity.

Please note, however, that it may be difficult for illion to properly investigate anonymous reports. If an Eligible Whistleblower elects to report anonymously, it is helpful if the Eligible Whistleblower provides an anonymised email address to enable ongoing two-way communication. Eligible Whistleblower could also consider adopting a pseudonym for the purposes of the report. Otherwise, Eligible Whistleblowers who report anonymously may not be able to obtain information or answer questions in relation to their report and may have difficulty relying upon legal protections as illion will not be aware of the Eligible Whistleblower's identity and will not be able to establish two-way communication.

If a Regulator or other Government authority (“**Authority**”) takes further legal action in relation to a disclosure, it may become necessary for an Eligible Whistleblower to identify themselves to the relevant Authority.

Anonymous reporters will qualify for protection under the Corporations Act and illion will continue to take all reasonable steps to ensure that the Eligible Whistleblower is treated fairly and protected against discrimination or detriment including in respect of their employment in the case of an employee.

4.5 What should a report include?

Reports should provide as much detail as possible to allow illion to make full and proper inquiries into the Reportable Conduct, including:

- the Whistleblower's name and contact details (or, if the report is anonymous and where possible, an anonymised email address or other anonymised contact point);
- a statement describing the Reportable Conduct;
- name of the person(s) involved;
- dates, times and locations;
- details of any relevant transactions;
- copies of any relevant documents;
- names of possible witnesses; and
- any steps already taken to report or address the matter.

5. Protection for Whistleblowers

5.1 When does the protection apply?

An Eligible Whistleblower can have access to the following Whistleblower protections under the Acts if they make a protected disclosure which meets the following criteria:

- the Whistleblower is an eligible whistleblower (as defined in this Policy and the Acts);
- the disclosure is made directly to an Eligible Recipient;
- the information disclosed relates to Reportable Conduct (as defined in this Policy and the Acts); and
- the Whistleblower has reasonable grounds for their suspicions.

The Eligible Whistleblower's disclosure may be anonymous and still be protected under the Acts. The Eligible Whistleblower may also be able to make a public interest or emergency disclosure to a journalist or parliamentarian in accordance with the Relevant Acts in limited circumstances which are summarised above.

5.2 What is the protection?

No detriment

Whistleblowers who report Reportable Conduct via the Reporting and Whistleblower Service provided by Deloitte or directly to an Eligible Recipient are entitled to certain protections under law, such as protection against the commencement of certain legal proceedings or actions in relation to the report.

Whistleblowers who have information which they suspect, on reasonable grounds, relates to Reportable Conduct and make a report of that information in accordance with this Policy will not be discriminated against or disadvantaged in their employment or engagement with illion, even if the report is subsequently determined to be incorrect or not substantiated.

All reasonable steps will be taken by illion to ensure that a Whistleblower will not be subject to any form of retribution, victimisation, discrimination, injury, harassment, demotion, dismissal or prejudice, because they have made a report. However, this Policy will not protect the Whistleblower if they are also involved in or connected to the Reportable Conduct.

Note, detrimental treatment is not:

- administrative action taken by illion that is reasonable to protect a Whistleblower from detriment (for example, moving a Whistleblower to another work location); or
- reasonable management action regarding a Whistleblower's unsatisfactory work performance or conduct.

Confidentiality and protection of identity

Subject to compliance with legal requirements, upon receiving a report under this Policy, Eligible Recipients are legally prohibited from disclosing any particulars about the disclosure that might identify, or is likely to lead to the identification of, the individual reporting the conduct, without first obtaining the relevant individual's express consent. However, the Eligible Recipient is able to disclose the complaint without the discloser's consent to ASIC, APRA or the Australian Federal Police, the Commissioner of Taxation or to an Australian legal practitioner for the purposes of illion:

- obtaining legal advice or representation;
- a court or tribunal finds it is necessary in the interests of justice, or;
- otherwise as permitted by law.

It may also be necessary to disclose information (other than the Whistleblower's identity) that is reasonably necessary for the purposes of investigating the Reportable Conduct, in which case illion will take all reasonable steps to reduce the risk of the Whistleblower being identified.

Steps that illion may take to protect the confidentiality of the Whistleblower's identity include:

- redacting personal information in the report and related documentation;
- referring to the Whistleblower in a gender-neutral way;
- speaking to the Whistleblower about aspects of the Whistleblower's disclosure that may inadvertently identify the Whistleblower;
- keeping documents relating to the Whistleblower's report secure and limiting access;
- reminding persons involved of the confidentiality requirements under the Acts.

Whistleblowers must also take their own steps to protect the confidentiality of their identity both prior to and after making a disclosure.

Additional protection of files and records

All files and records created in relation to a report and/ or an investigation into Reportable Conduct under this Policy will be securely stored and retained by illion in a confidential repository. Access to the confidential repository will be limited to the illion Chief Executive Officer, the illion Chief Legal Officer, the Chair of the illion Board and where applicable, other persons authorised by the illion Chief Executive Officer, the illion Chief Legal Officer, the Chair of the illion Board.

Support for Whistleblowers

illion is committed to supporting Whistleblowers who wish to make a report of Reportable Conduct under this Policy. If a Whistleblower chooses to make a report under this Policy in person, they are entitled to do so with a support person present. illion will take all reasonable steps to ensure that Whistleblowers who make a report of Reportable Conduct receive appropriate support and engagement.

illion provides support to Whistleblowers, which includes the following:

- where possible, keeping the Whistleblower informed of the progress and outcomes of the enquiry or investigation (subject to any privacy and confidentiality obligations and as required by law) including any proposed remedial actions;
- keeping the Whistleblower's identity confidential and/or anonymous, if requested by the Whistleblower to do so;
- endeavouring to resolve any concerns that the Whistleblower has regarding actual or threatened detrimental treatment because the Whistleblower has made, or is considering making, a report under this Policy;
- providing training (and re-training as required) to employees, managers and officers about this Policy;
- providing free access to a confidential support and counselling service through illion's Employee Assistance Program (details are set out on the intranet and in the Employee Assistance Program Policy).

Additional support for Whistleblowers is available via:

- illion's Employee Assistance Program – details are set out in the Employee Assistance Program Policy;
- the illion People & Culture Team which may include appointing an independent support person;
- independent support service providers such as Lifeline and Beyond Blue (see contact details below for Australia and New Zealand), please contact the People & Culture Team for contact details in jurisdictions outside Australia and New Zealand. The Discloser should understand that use of these support services may require the Discloser to consent to the disclosure of their identity or information that may lead to the discovery of their identity.

Australia	Service	Phone
	Lifeline AU	13 11 14
	Beyond Blue	1300 22 4636
New Zealand	Lifeline NZ	0800 543 354
	Mental Health Foundation	1737 (SMS)

Fairness (Protection of a Whistleblower)

It is important to illion that individuals who make a disclosure under this Policy do not suffer detriment or adverse treatment as a result of their disclosure. Detriment or adverse treatment may include actual or threatened:

- dismissal, demotion, suspension, alteration of an employee’s position/duties or injury to an employee in his or her employment;
- discrimination between an employee and other employees of illion;
- damage to property, reputation or financial position;
- harassment, intimidation, harm or injury including psychological harm;
- any other damage to a person

illion does not tolerate any form of unfair treatment, threat, retaliation or other action against any individuals who have made or assisted in the making of a disclosure or involved in an investigation of a report under this Policy and will take steps to ensure that Whistleblowers do not suffer detriment as a result of their act of disclosure and reporting. Any unfair treatment, threat, retaliation or other action must immediately be reported to a member of illion’s People & Culture Team or the illion Chief legal Officer or the illion Chief Executive Officer. If the matter involves the illion Chief Legal Officer and/or illion Chief Executive Officer, it should be reported to the Chair of the illion Board or another Board member to investigate and address.

In addition, a Whistleblower who makes a report of Reportable Conduct under this Policy, may be entitled to additional protections under law. These protections ensure that eligible persons who make eligible disclosures are protected against civil, administrative and criminal liability, the enforcement of certain contractual remedies in respect of those disclosures and disclosure of Reportable Conduct not being admissible in evidence against the Whistleblower in criminal proceedings or proceedings for the imposition of a penalty (except in respect of disclosures of false information). illion encourages Whistleblowers to seek their own independent legal advice.

Whistleblowers are entitled to seek compensation and other remedies from illion for loss, damage or injury they have suffered as a result of a Whistleblower disclosure or if illion has failed to take reasonable precautions and has not exercised appropriate due diligence to prevent the loss, damage or injury from occurring.

A Whistleblower may also have rights to compensation for loss, damage or injury and other remedies under the Acts if the Whistleblower’s identity has been disclosed or where the Whistleblower has been subject to detrimental treatment.

6. False or frivolous reports

6.1 There must be grounds to make a report

A report may have serious consequences, including potential damage to the career prospects and reputation of the person who is the subject of any allegations of Reportable Conduct. Therefore, it is very important that Whistleblowers who make a report under this Policy do so with reasonable grounds to suspect that the Reportable Conduct has, or will shortly, take place.

illion takes reports made under this Policy very seriously – it is important to note that the protections afforded a Whistleblower do not apply where a report is made falsely, is misleading or is frivolous without having reasonable grounds to suspect that the Reportable Conduct has, or will shortly, take place. Disciplinary action may be taken against any employee who makes a false or frivolous report under this Policy without having reasonable grounds to do so.

A Whistleblower will not be considered to have made a report with reasonable grounds to suspect that the Reportable Conduct has, or will shortly, take place, if the report is frivolous, raised for a malicious reason or ulterior motive, or if it is not based on facts and/or circumstances to substantiate a reasonable basis for the report. Repeated reports about trivial matters may also be considered frivolous.

7. Fair treatment of other persons

illion will take all reasonable steps to provide any employee mentioned in a Whistleblower's report with an opportunity to respond to the allegations as part of any Whistleblower inquiry or investigation.

Employees who are mentioned in any Whistleblower report will also be entitled to access the Employee Assistance Program (details are set out on the intranet and in the Employee Assistance Program Policy).

8. Investigations

8.1 How illion investigates Reportable Conduct

illion's Whistleblower Investigation Officer (as defined below) will investigate all Reportable Conduct reported under this Policy as soon as possible after the matter has been reported. The Whistleblower Investigation Officer will have responsibility and oversight for the investigation. The Whistleblower Investigation Officer will keep the identity of the Whistleblower confidential (unless an exception applies), but may appoint a person internal or external to illion to assist in the investigation of a matter raised in a report; this is particularly relevant where expert or specialist skills may be required to investigate the matter.

Where appropriate, and where the Whistleblower has provided illion with contact details, illion will aim to provide regular feedback to the Whistleblower regarding the investigation's progress and/or outcome (subject to considerations of the privacy and confidentiality of those against whom the allegations are made.) As a guide and depending on the nature of the allegations made, an initial review may generally be completed within six weeks of illion's receipt of a report under this Policy while further inquiries or investigations may take up to 12 weeks. However, timeframes for enquires or investigations will vary depending on the nature of the report and will be at illion's discretion. 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. At the conclusion of an investigation into Reportable Conduct, a confidential report will be provided to the Chair of illion's Board of Directors, the illion Chief Executive Officer and the illion Chief Legal Officer. Depending on the seriousness and nature of the matter, illion's Board of Directors may also receive a copy of the report. While feedback will be provided to the Whistleblower (where the Whistleblower has provided illion with contact details) they will not receive a copy of the final report.

Substantiated Reportable Conduct may result in disciplinary action in respect of the persons against whom the substantiated allegations are made, and may include termination of employment or engagement (as relevant).

8.2 Who investigates a matter?

Once a Reportable Conduct matter has been raised to an Eligible Recipient a decision will be made as to who will be appointed as the Whistleblower Investigation Officer. This decision may be made by the Eligible Recipient in consultation with the illion Chief Executive Officer, illion Chief Legal Officer or the Chair of the illion Board.

A Whistleblower Investigation Officer will be a party that has a level of experience and understanding of the matter that allows them to conduct a thorough and impartial investigation into the matter raised. It is important to note that this may be any one of the following:

- a lawyer employed by illion;
- a People & Culture employee;
- a Senior Business Leader;
- an external party such as a lawyer or other expert engaged for the specific investigation purpose; or
- another person nominated by the illion Chief Operating Officer, illion Chief Legal Officer or the Chair of the illion Board of Directors.

8.3 Who maintains the Whistleblower register?

Any disclosures of Reportable Conduct will be securely retained in illion's confidential 'Whistleblowing register' and such register will be overseen by the illion Chief Legal Officer and such other person authorised by the illion Chief Legal Officer.

9. Training and communication

9.1 Where can I find this Policy?

illion's officers and employees can access this Policy via the illion intranet. This Policy is also publicly available on illion's website under the Legal section.

illion will take reasonable steps to ensure that Whistleblowers are aware of, and understand this Policy and the types of behaviour or scenarios that are reportable, including through internal communications and training.

10. Review of Policy

10.1 When is this Policy reviewed?

illion reserves the right to amend this Policy from time to time and will review this Policy annually or at such other reasonable intervals to ensure that this Policy remains effective and relevant to illion, and that it continues to comply with all relevant legislative requirements.