

Whistleblower Policy

July 2024

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Purpose

Lockton Companies Australia Pty Ltd and Lockton Companies New Zealand Limited Partnership ("Lockton") is committed to providing a professional working environment that is free of any form of corruption, dishonesty or criminal activity.

This policy introduces a mechanism to facilitate the reporting of any, actual or suspected, unlawful or irregular activity by an employee, customer, supplier and/or outside third party that engages with Lockton. It also ensures that employees and others can report their concerns freely and are not prejudiced in any manner for making the disclosure.

Scope

This policy relates to Lockton and its subsidiaries and applies to all current and former employees, directors (officers), contractors, consultants and third parties (suppliers) and their employees as well as the relatives, spouses and dependents of those individuals.

A person who speaks up to report wrongdoing or misconduct under this policy is known as an eligible whistleblower. An eligible whistleblower has legal rights under the *Corporations Act 2001* (Cth) ("Corporations Act") and other legislation (for example, tax laws). This policy does not override those rights.

Policy

PROTECTED REPORTABLE CONDUCT

The misconduct or information about an improper situation which a person or whistleblower wishes to disclose may involve:

- a breach of the law;
 - tax evasion;
 - criminal conduct;
 - fraud or theft;
1. genuine concerns about modern slavery or human trafficking relating to Lockton's people, business or supply chain;
 - a danger to the public or to the financial system; and/or
 2. the deliberate covering up of information tending to show circumstances of the above;
 - conduct which;
 - is a matter of public interest; or
 3. concerns a substantial or imminent danger to the health or safety of any person(s) or to the natural environment;
 4. any other conduct or act which may cause loss to Lockton or which may otherwise be detrimental to its interests.

NON-PROTECTED CONDUCT

If your report of misconduct is based solely on a personal work-related grievance you have, the whistleblower protections will not apply.

INTERNAL REPORTING

The procedures set out in this policy are designed to complement routine / day-to-day reporting and communication channels between supervisors, managers and employees. Workers are encouraged to raise Protected Reportable Conduct at any time with their supervisors and managers and are encouraged to make every attempt to report and resolve Protected Reportable Conduct internally where possible and appropriate.

Lockton would encourage the member of staff to report such actions or suspected actions to the or Head of Legal, Risk and Compliance or the General Manager - Operations.

The report should include the following information where available:

- the nature of conduct/incident involved;
- the parties involved and the extent of their involvement;
- any available evidence relating to the conduct/incident;
- copies of relevant documents; and
- any other details which may assist in the investigation.

Any violation of this or any other policy shall subject the offender to disciplinary action up to and including termination.

EXTERNAL REPORTING

If you are not comfortable or unable to report misconduct internally, you may report it to Lockton externally.

Reports may be made to:

- people authorised by a company to receive whistleblower reports including the dedicated whistleblower hotline and the Whistleblower Investigations Officer (WIO);
- ASIC, APRA or the ATO; or
- 5. a legal practitioner, for the purpose of obtaining legal advice or legal representation about the whistleblower protections.

You have the option to submit a report, named, semi anonymously or anonymously and maintain confidentiality throughout and after the process, all while being safeguarded under the Corporations Act.

The Safecall reporting options include:

- Website: <https://www.safecall.co.uk/file-a-report/>
- Telephone- (Available 365 days a year 24/7)
 - Australia – 1800 312 928
 - New Zealand – 00 800 7233 255

REPORT HANDLING AND INVESTIGATION PROCESS

Upon receipt of a report, our external service provider, Safecall, will assess the report and obtain as much information as possible. All information will be documented and contained in the secure online reporting platform to ensure the maintenance of confidentiality of your report and protect your identity. The information you provide and agree that Safecall can share will be sent to senior management in Lockton who will decide on the most appropriate course of action. All protected disclosures are assessed by our Whistleblower Investigations Officer (WIO).

Once you have submitted a report Safecall will provide you with an activation link. Using this link will allow you to set your password. You will then be able to login to your account. For anonymous cases a username will be generated to enable you to login.

After two working days please login to your account to check your report for feedback or further questions. Once submitted you will have 8 hours to activate your account. Please contact Safecall if you have any issues.

Depending on the issue being raised, an investigation may be required. If an investigation is required, the Whistleblower Investigation Officer (WIO) will be responsible for overseeing or conducting the investigation whilst the Whistleblower Protection Officer (WPO) will be your point of contact for ensuring you are protected and supported throughout the process.

In some cases, the WIO may appoint an external investigator to undertake an investigation on our behalf. The duration of a formal investigation will depend on the circumstances including the number of allegations, witnesses, and other factors. You can receive updates, provide more information and ask questions regarding your report and the investigation by contacting the WIO, WPO or investigator via the secure online reporting platform.

WHISTLEBLOWER PROTECTIONS

Protecting your identity:

Every effort will be made to protect the anonymity of those who report anonymously. This includes redacting identifying information, using gender-neutral language, and ensuring that investigations are conducted by appropriately trained staff.

Throughout the process, whistleblowers can choose not to answer any questions that they believe could potentially reveal their identity, even during follow-up discussions.

Ensuring fairness:

Lockton acknowledges its responsibility and undertakes to ensure that no employee reporting unlawful or irregular activity, acting as a witness or participating in anyway with respect to the report of Reportable Conduct will be adversely prejudiced or disadvantaged for making the disclosure.

Appropriate disciplinary action, including but not limited to dismissal, will be invoked against any member of staff who directly or indirectly prejudices or disadvantages a member of staff for making the disclosure in terms of this Policy.

Providing Support:

The Whistleblower Protection Officer can initiate or coordinate support for employees who have or are in the process of making a report. The appropriate support person and/or other support services will be chosen based on the scenario and nature of the request. As a first step, employees can contact EAP.

FALSE REPORTING / DISCLOSURE

The disclosure of unlawful or irregular activity must be made in good faith and as such the disclosure must be of information that the employee reasonably believes to be true.

Any disclosure in terms of this Policy for reasons other than the genuine intention to expose unlawful or irregular activity for the well-being of Lockton and its employees (such as personal gain, malice or revenge) will not be tolerated and will result in disciplinary action that could result in summary dismissal.

Appendix 1: Related Documents

GS01: General Statement of Policy

PB01: Broking Standards and Customer Service Manual

PCQ03: Compliance Requirements

Appendix 2: Document Control

Doc No.	Rev No.	Date	Prepared By	Checked By	Approved By	Reason for Issue
PCQ11	1	31/10/2024	A Wait	A Rankine	A Rhodes	First Issue
PCQ11	2	25/01/2017	A Hill	A Wait	P Marsden	Updated contact persons
PCQ11	3	30/06/2021	A Hill	A Wait	P Marsden	Review and rebrand
PCQ11	4	30/04/2023	F Wilde	A Wait	P Marsden	Annual review and update
PCQ11	5	12/07/2024	D Tippett	K Dollin	P Clark	Annual review and update

LEGACY DOCUMENTS: None