

Purpose

This Policy (**Policy**) supports OFX's commitment to the highest standards of ethical conduct in all its business activities. It applies to OFX Group Limited and its subsidiaries and affiliates anywhere in the world.

OFX encourages a culture of reporting actual or suspected conduct which is illegal, unacceptable or undesirable. Any person who reports conduct as a Whistleblower who is acting honestly, reasonably and with a genuine belief about the conduct will be supported and protected.

Submitting a report

A Whistleblower can:

- complete an Online Disclosable Conduct Form through the OFX Online Reporting Portal (<https://ofx.whispli.com/speakup>), which is available to internal and external parties;
- report the matter to a Whistleblower Protection Officer by phone, email whistleblower@ofx.com or letter (ATT: Whistleblower Protection Officer, OFX, Level 19, 60 Margaret Street, Sydney NSW 2000, Australia); or
- for the United Kingdom only, contact Public Concern at Work, an independent whistleblowing charity in the United Kingdom which provides free help to prospective Whistleblowers and advice on whistleblowing laws:
 - E-mail: whistle@pcaw.co.uk
 - Website: www.pcaw.co.uk

Examples of support provided by OFX to Whistleblowers includes:

- a Whistleblower hotline
- a fair and objective investigation process
- support from People and Culture

Who is covered?

Whistleblowers who are protected by this Policy include all current and former:

- employees and officers of OFX;
- suppliers of goods or services to OFX and their employees;
- associates (e.g. partners) of OFX; and
- relatives, spouses, children or dependents of any of these people

In the United Kingdom, only 'workers', being employees, self-employed workers, agency staff and trainees of OFX are eligible Whistleblowers.

What conduct can be reported?

This Policy protects any Whistleblower who has objectively reasonable grounds to suspect in relation to OFX:

- misconduct; or
- an improper state of affairs or circumstances.

As a general rule, conduct that can be reported as **Disclosable Conduct** includes conduct that:

- is dishonest, corrupt or illegal;
- constitutes fraudulent activity;
- constitutes harassment, discrimination or bullying;
- is unethical or otherwise has the potential to damage OFX's reputation;

- abuses human rights, including modern slavery or human trafficking within OFX's supply chain or customers;
- breaches OFX's policies or Code of Conduct;
- is a contravention of the Corporations Act 2001 (Cth), the Australian Securities and Investments Commission Act 2001 (Cth), the Competition and Consumer Act 2010 (Cth); or
- represents a danger to the public or the financial system.

Examples of Disclosable Conduct and conduct that is not covered by this Policy are included in Appendix A.

Retaliation against any person who raises concerns of Disclosable Conduct under this Policy or against anyone who helps address a concern that is raised is also Disclosable Conduct.

If you are unsure whether something you are concerned about is Disclosable Conduct, you may seek confidential guidance from a Whistleblower Protection Officer.

Whistleblowers are not expected to investigate their concerns or to provide details of their validity prior to making a disclosure of Disclosable Conduct.

Who should you report your concern about Disclosable Conduct to?

Whistleblowers are encouraged to report any concerns about Disclosable Conduct to any of the following:

- to your immediate or next higher-level manager;
- to one of the following Whistleblower Protection Officers at OFX:
 - the Chief Legal Officer and Company Secretary; or
 - the Chief People and Culture Officer; and
- through the OFX Online Reporting Portal – Whispli: <https://ofx.whispli.com/speakup>; and
- to any director or senior manager of OFX or OFX's internal or external auditor (including a member of an audit team conducting an audit).

Whistleblowers qualify for protection if Disclosable Conduct is disclosed to a lawyer, the police or a regulatory body.

In exceptional circumstances a Whistleblower who makes a report to a member of parliament or journalist will be entitled to protection if you reasonably believe there is an imminent risk of serious harm or danger to public health or safety, or to the financial system if the information is not acted on immediately, and if a reasonable period has passed since you first disclosed the Disclosable Conduct to one of the Eligible Recipients outlined above.

OFX does not discourage disclosure to a lawyer, regulatory body, member of parliament or a journalist but you are encouraged to contact a Whistleblower Protection Officer or independent legal practitioner prior to making such a disclosure to obtain advice regarding whether the disclosure qualifies for protection.

In the United Kingdom, the report should be made through OFX, but it can also be made through any of the 'prescribed persons' set out at: <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2>

How do you submit a report?

To submit a formal report of Disclosable Conduct, you can:

- complete an Online Disclosable Conduct Form accessible through the OFX Online Reporting Portal <https://ofx.whispli.com/speakup>, which is available to internal and external parties;
- report the matter to a Whistleblower Protection Officer by phone, email (whistleblower@ofx.com) or letter (ATT: Whistleblower Protection Officer, OFX, Level 19, 60 Margaret Street, Sydney NSW 2000, Australia); or

- for the United Kingdom only, contact Public Concern at Work, an independent whistleblowing charity in the United Kingdom which provides free help to prospective Whistleblowers and advice on whistleblowing laws:
 - E-mail: whistle@pcaw.co.uk
 - Website: www.pcaw.co.uk

Whistleblowers are encouraged to clearly communicate that they are making a disclosure of Disclosable Conduct and to provide as much information as possible, including any known details related to the Disclosable Conduct and the steps (if any) that have been taken to disclose the matter elsewhere in an attempt to resolve the concern.

How can you make a report anonymously?

Disclosable Conduct may be reported anonymously, confidentially, securely and outside of business hours through the OFX Online Reporting Portal <https://ofx.whispli.com/speakup> by choosing to remain anonymous or by sending an anonymous written report directly to a Whistleblower Protection Officer at Level 19, 60 Margaret Street, Sydney NSW 2000, Australia.

What happens after you make a report?

The process for investigation of a Whistleblower's report of Disclosable Conduct is set out in Appendix B. Where investigations substantiate an allegation arising from the disclosure of Disclosable Conduct, the matter will be dealt with in accordance with established administrative or disciplinary procedures, which may result in disciplinary action, including termination of employment or engagement and matters may be referred to external parties where appropriate (e.g. in matters that may involve criminal behaviour).

What protection will you receive if you submit a report?

We support Whistleblowers who raise genuine concerns under this Policy, even if they turn out to be mistaken (provided the report was not made in bad faith or for an improper purpose). In addition, OFX will not tolerate any retaliation against any person who raises a report of Disclosable Conduct or helps to address a concern raised.

We will take disciplinary action, which may include dismissal, against any person who causes detriment or threatens to cause detriment to a person because they believe or suspect that the person has made or proposes to make a disclosure under this Policy.

For the purposes of this Policy, '**detriment**' includes dismissal, alteration of a person's position or duties to their disadvantage, discrimination, harassment, intimidation, harm or injury to a person including psychological harm, damage to property, reputation, business or financial position, and any other damage to a person.

We are committed to providing appropriate support to any person who reports Disclosable Conduct. The nature of the support will depend on the nature of the conduct reported and the personal circumstances of the person who discloses the Disclosable Conduct.

Examples of the support provided by OFX include:

- the provision of the *Whispli* hotline;
- a fair and objective investigation process;
- support from People and Culture.

Whistleblowers have certain protections granted to them under relevant legislation, including the *Corporations Act 2001 (Cth)* and the *Taxation Administration Act 1953 (Cth)*

Fair treatment of employees mentioned in a report

Any OFX employee who is the subject of, or mentioned in, a report of Disclosable Conduct will be:

- informed about the matter in accordance with the principles of natural justice and procedural fairness;
- given a reasonable opportunity to put their case to the Whistleblower Investigation Officer if any investigation is conducted; and
- informed of the outcome of the investigation (but will not be given a copy of the investigation report).

Where an investigation does not substantiate a disclosure made in a report, the fact that an investigation has been carried out, the results of the investigation, and the identity of any person the subject of the report will remain confidential, unless the subject of the report requests otherwise.

False reporting

We treat all reports of Disclosable Conduct seriously and ensure that Whistleblowers who raise concerns in accordance with this Policy have the benefit of the protections afforded by this Policy. However, deliberate false reporting will not be tolerated.

False reports could have significant effects on the reputation of OFX and the personal reputations of other people. Any person found to have made a deliberate false report will be subject to disciplinary action.

Will your report be treated confidentially?

We are committed to ensuring that all Whistleblower reports are managed with appropriate confidentiality in accordance with all laws (including the *Corporations Act 2001 (Cth)* and the *Tax Administration Act* where applicable).

When implementing this Policy, OFX will:

- obtain the Whistleblower's consent before disclosing any particulars that suggest the identity of the Whistleblower;
- ensure that any disclosure with the Whistleblower's consent is on a strictly confidential basis to a restricted number of people who are directly involved in handling and investigating the disclosure;
- take reasonable steps to reduce the risk that a Whistleblower is identified as part of any process conducted under this Policy; and
- retain all files and records created from an investigation under strict security and confidentiality.

The unauthorised release of information without a Whistleblower's consent to any person not involved in the investigation is a breach of this Policy.

Nothing in this Policy prevents OFX or any person disclosing information required by law.

Reporting

A Whistleblower Protection Officer must report to the Audit, Risk and Compliance Committee of the OFX Group Limited Board on reports of Disclosable Conduct received and investigations undertaken. The Audit and Risk Committee must

provide a report to the OFX Limited Board with details of all reports of Disclosable Conduct received and investigations undertaken.

Any material breach of this Policy must be reported immediately to the Chair of the OFX Limited Board.

If a person who makes a disclosure of Disclosable Conduct considers that their disclosure has not been dealt with in accordance with this Policy, or that they have been subject to retribution or other detriment as a result of making the disclosure, the matter should be escalated to the Whistleblower Investigation Officer in the first instance or otherwise to the Chair of the Audit, Risk and Compliance Committee. The Whistleblower Investigation Officer, in consultation with the Chair of the Audit & Risk Committee, will determine the most appropriate course for handling the matter, which may include informal resolution options or a formal investigation.

Any matters of a criminal nature will be reported by a Whistleblower Protection Officer, in consultation with the Chair of the Board, to the police and, if appropriate, other appropriate regulatory authorities.

Access to this Policy

This Policy is available in the Corporate Governance section of the OFX website.
A copy may also be obtained from a Whistleblower Protection Officer.

Training

We provide training to employees in respect of their rights and obligations under this Policy and provide training to managers and others who may receive disclosures made under this Policy on how to handle those disclosures.

Review and amendment

This Policy and related procedures are reviewed:

- at least once in every two years to ensure that Whistleblower reports are being appropriately recorded, investigated and responded to and to consider whether any changes are required to the Policy or procedures; and
- more regularly as legislative requirements change and best practice evolves.

This Policy can only be amended with the approval of the OFX Group Limited Board.

Policy review details

Owner: Company Secretary

Updated: July 2021

Approved by: OFX Group Limited Board

Appendix A: Examples of conduct that is Disclosable Conduct and protected under this Policy

Examples of conduct that constitutes Disclosable Conduct include failure to comply with a financial services license and failure to comply with reporting obligations under anti-money laundering or counter-terrorism financing laws in any country where OFX is operating.

Disclosable matters include conduct that may not involve a contravention of a particular law. For example, 'misconduct or an improper state of affairs or circumstances' may not involve unlawful conduct in relation to OFX generally but may indicate a systemic issue that the relevant regulator should know about to properly perform its functions. It may also relate to dishonest or unethical behaviour and practices, conduct that may cause harm, conduct that is contrary to human rights or conduct prohibited by OFX's Code of Conduct or policies.

Disclosure that is not covered by this Policy

Whistleblowers may only disclose Disclosable Conduct based on information that is directly known to them. The Whistleblower must have reasonable grounds to suspect the alleged Disclosable Conduct has occurred or is likely to occur. This does not include rumours of Disclosable Conduct or hearsay.

Disclosure of information that is not related to Disclosable Conduct is not covered by this Policy and does not qualify for protection under the applicable legislation.

In particular, this Policy does not cover disclosure that relates solely to a person's employment or former employment with OFX which has implications for that employee personally but:

- does not have significant broader implications for OFX; and
- does not relate to anything done or alleged to be done by the person in relation to Disclosable Conduct.

Matters that might constitute personal work-related grievances that are not covered by this Policy include:

- a decision relating to an employee's engagement or the terms and conditions of engagement, including a decision regarding any transfer or promotion applied for;
- raising with an employee matters relating to their performance in their role, or any other matters arising in the ordinary course of their engagement;
- any investigation of alleged misconduct by an employee, or a decision to take disciplinary action, suspend or terminate their engagement; or
- an interpersonal conflict between an employee and another employee.

Sometimes a disclosure about one of these matters may also constitute a report about Disclosable Conduct, for example if the disclosure relates to information that suggests misconduct beyond the discloser's own circumstances or a larger or more systemic issue about the culture or environment of OFX.

If you do have a personal work-related grievance that does not involve any Disclosable Conduct but would like internal assistance to resolve that grievance, then please contact your direct reporting manager or your People and Culture Manager.

Appendix B: Process for investigation of Disclosable Conduct

Upon receipt of a report from a Whistleblower the following process will apply:

- the Recipient will notify a Whistleblower Protection Officer as soon as reasonably possible (with the Whistleblower's consent if known);
- if the Whistleblower can be contacted, the Whistleblower Protection Officer will acknowledge the disclosure within a reasonable period after the disclosure is received;
- the Whistleblower Protection Officer will determine whether further investigation is appropriate;
- if it is determined that there is insufficient information or evidence to warrant further investigation, the Whistleblower will be informed (if the disclosure was not confidential) and no further action will be taken;
- if it is determined that further investigation is appropriate, the matters will be referred by the Whistleblower Protection Officer to an individual that is a specialist with appropriate knowledge and objectivity to investigate (**Whistleblower Investigation Officer**) and the following will occur;
 - if the Whistleblower can be contacted the Whistleblower Investigation Officer will contact the Whistleblower as soon as practicable:
 - to acknowledge receipt of the disclosure;
 - to discuss the Whistleblower's welfare; and
 - to establish a process, including expected timeframes, for reporting to the Whistleblower on the progress of dealing with the disclosure;
 - the Whistleblower Investigation Officer will undertake a formal investigation as soon as practicable that is objective, fair, thorough, confidential and without bias. Investigations will be independent of the business unit in respect of which allegations have been made, the Whistleblower, or any person who is the subject of the Disclosable Conduct; and
 - the Whistleblower Investigation Officer will advise the Whistleblower of the final outcome of the investigation, where appropriate and possible.