



SilverChef and EconoLease Whistleblower Policy

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VERSION CONTROL

Date	Version Number	Author	Approver	Details of revision
21/09/2017	2017-01	Internal Audit	Board	Creation of the policy
01/2020	2020-01	Risk	Head of Risk/ DPO	Minor Changes to reflect Change of ownership and changes to business operations
10/2022	2022-01	Risk	ERC	Rewrite to separate Policy and guidelines
02/2025	2025-01	Risk	CEO	Inclusion of Requirements of Whistleblower Regulatory Guide
07/2025	2025-01	Risk	CEO	Inclusion of EconoLease brand

1. POLICY STATEMENT

SilverChef and EconoLease (the Company) are committed to conducting business with the highest level of honesty, fairness, and integrity. The Whistleblower Policy (Policy) is designed to promote compliance with the Company's values and Code of Conduct and to foster a culture of support which encourages safe reporting of Misconduct. The Company is committed to creating and maintaining an open working environment in which employees, directors, and external stakeholders are able to raise concerns regarding actual or suspected Misconduct without the fear of retribution.

2. POLICY OVERVIEW

2.1 Purpose

The objectives of this Policy are to:

- (a) provide a framework for identifying and managing instances of Misconduct and provide guidance on how to report suspected or actual Misconduct;
- (b) foster a 'speak up' culture and create a safe environment to raise suspected or actual Misconduct;
- (c) reinforce the Company's commitment to the highest standards of conduct and ethical behaviour in its business activities;
- (d) reassure anyone who raises concerns that they can do so without fear of reprisal, dismissal, or Discriminatory Treatment.

This Policy does not in any way restrict or diminish the rights of any individual to report matters directly to the relevant regulators or law enforcement agencies. However, a Discloser is encouraged to raise any concerns with SilverChef or EconoLease via the reporting mechanism outlined in the Whistleblower Guidelines in the first instance.

2.2 Scope

This Policy applies to Silver Chef Rentals Pty Ltd and its controlled entities and operations globally, including EconoLease. All employees (including former employees), directors and external parties that deal with SilverChef or EconoLease, either directly or indirectly, have the ability to report suspected or actual Misconduct under this Policy.

A Whistleblower is an individual who is, or has been, any of the following in relation to the Company:

- a) an officer or employee (e.g. current and former employees who are permanent, part-time, fixed-term or temporary, interns, secondees, managers, and directors);
- b) a supplier of services or goods to the Company (whether paid or unpaid), including their employees (e.g. current and former contractors, consultants, service providers and business partners);
- c) an associate of the Company; and
- d) a relative, dependant or spouse of a current or former employees, contractors, consultants, service providers, suppliers and business partners).

2.3 Policy Revision

The CEO is responsible for approving major changes to this Policy. The Chief Risk Officer can make minor administrative changes to the Policy, and these do not require formal approval, however they should be noted in the version control section. Major changes to the Policy should be communicated to the Board.

2.4 Availability

To ensure all staff have access to this Policy it will be made available on the Company's Corporate Intranet.

3. DEFINITIONS

Terms used throughout this Policy, and require clarification, are defined in Appendix 1.

4. WHISTLEBLOWER REPORTING

The Company provides a number of options for a Discloser to report Misconduct (Whistleblower Misconduct Report). These options, and details on how to access them, are outline detailed in the Whistleblower Reporting Guidelines.

5. DISCLOSER PROTECTION

The Company is committed to ensuring confidentiality in respect of all matters raised under this Policy, and that those who make a Whistleblower Misconduct Report in good faith are treated fairly and do not suffer any mistreatment.

5.1 Protection of the identity and confidentiality of a Discloser

The Company has a legal obligation to protect the confidentiality of a Discloser's identity. The Company including its employees and officers cannot disclose the identity of a Discloser or information that is likely to lead to the identification of the Discloser. It is illegal for a person to identify a Discloser or disclose information that is likely to lead to the identification of the Discloser. The exception to this is if the Company discloses the identity of the Discloser:

- a) to ASIC, APRA, or a member of the Australian Federal Police (within the meaning of the Australian Federal Police Act 1979);
- b) to a legal practitioner (for the purposes of obtaining legal advice or legal representation about the whistleblower provisions in the Corporations Act);
- c) to a person or body prescribed by regulations; or
- d) with the consent of the Discloser.

A person can disclose the information contained in a disclosure with or without the consent of the Discloser if:

- a) the information does not include the Discloser's identity;
- b) the Company has taken all reasonable steps to reduce the risk that the Discloser will be identified from the information; and
- c) it is reasonably necessary for investigating the issues raised in the disclosure.

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A Discloser can lodge a complaint with the Company about a breach of confidentiality either directly with their People Leader, Executive, People Team or through the provisions of this Whistleblower Policy. Additionally the Discloser may lodge a complaint with a regulator, such as ASIC, APRA or the ATO, for investigation.

A person lodging a claim of Misconduct also has the option to not provide their name, however it should be noted that this may impede the effective investigation of the claim.

5.2 Protection of files and records

Notwithstanding the Company's legal obligation to reduce the risk that the Discloser could be identified from the information contained in a disclosure the Company is committed to protecting the identity of the Discloser. Measures that the Company may take to reduce the risk that the Discloser could be identified include:

- a) all personal information or reference to the Discloser witnessing an event will be redacted;
- b) the Discloser will be referred to in a gender-neutral context;
- c) where possible, the Discloser will be contacted to help identify certain aspects of their disclosure that could inadvertently identify them; and
- d) disclosures will be handled and investigated by qualified staff.

All files and records created as part of the investigation will be retained under strict security measures no less stringent than the Company uses to protect its confidential business information. Unauthorised release of the information to someone not involved in the investigation without the consent of the Discloser will be a breach of this Policy. For the sake of clarity, information may be released to senior managers or directors of the Company who need to know the information in order to take appropriate action or for corporate governance purposes and such disclosure will not constitute a breach of this Policy. Other than the initial communication of the initial disclosure to a generic eMail the dissemination of information relating to the disclosure will be to direct recipient's eMail address, that is generic eMail addresses will not be used.

Staff involved in handling and investigating a disclosure will be reminded about the confidentiality requirements, including that an unauthorised disclosure of a Discloser's identity may be a criminal offence.

5.3 Fairness/Protection from Detrimental Treatment or Omissions

The Company is committed to ensuring that a Discloser is treated fairly and does not suffer from Detrimental Treatment. The Company will not tolerate any Discloser receiving Detrimental Treatment as a result of making a report under this Policy.

Any Discloser who is subjected to Detrimental Treatment as a result of making a Whistleblower Misconduct Report under this Policy should immediately inform the DPO, a member of the People and Impact team, a senior manager or other executive in the business.

A person cannot engage in conduct that causes detriment to a Discloser (or another person), in relation to a disclosure, if:

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- a) the person believes or suspects that the Discloser (or another person) made, may have made, proposes to make or could make a disclosure that qualifies for protection; and
- b) the belief or suspicion is the reason, or part of the reason, for the conduct.

In addition, a person cannot make a threat to cause detriment to a Discloser (or another person) in relation to a disclosure. A threat may be express or implied, or conditional or unconditional. A Discloser (or another person) who has been threatened in relation to a disclosure does not have to actually fear that the threat will be carried out.

Examples of measures that the Company will take to ensure a Discloser is not exposed to Detrimental Treatment include:

- a) the Company may perform a risk assessment to determine what, if any, Detriment the Discloser may suffer and/or any other person may suffer (e.g. other staff who might be suspected to have made a disclosure),
- b) offer support services such as EAP, or other professional/legal services;
- c) implementation of strategies to help a Discloser minimise and manage stress, time or performance impacts, or other challenges resulting from the disclosure or its investigation;
- d) consider actions for protecting a Discloser from risk of detriment—the Company may allow the Discloser to perform their duties from another location or remotely from home, reassign the Discloser to another role at the same level, make other modifications to the Discloser’s workplace or the way they perform their work duties;
- e) ensuring that management are aware of their responsibilities to maintain the confidentiality of a Discloser, 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.

If Detrimental Treatment has already occurred the Company will investigate and address the detrimental Conduct. Appropriate action that could be taken would be in accordance with the Company’s staff disciplinary process for staff misconduct.

If a Discloser believes they have suffered Detrimental Treatment they should raise the matter directly with their People Leader, Executive, People Team or through the provisions of this Whistleblower Policy. Depending upon the nature of the Detrimental Treatment the Company will instigate a further investigation with the outcome of any investigation to be reported to the Executive Risk Committee. Additionally, the Discloser may seek independent legal advice or contact a regulatory body, such as ASIC, APRA or the ATO.

A Discloser is protected from the following actions in relation to the Disclosure they make:

- a) civil liability (e.g. any legal action against the Discloser for breach of an employment contract, duty of confidentiality or another contractual obligation);
- b) criminal liability (e.g. attempted prosecution of the Discloser for unlawfully releasing information, or other use of the disclosure against the Discloser in a prosecution (other than for making a false disclosure)); and

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- c) administrative liability (e.g. disciplinary action for making the disclosure).

It should be noted that a Discloser is not immune for any misconduct a Discloser has engaged in that is revealed in their disclosure.

The Company is also committed to ensuring fair treatment of any person referred to in a Whistleblower Misconduct Report, including:

- a) a presumption of innocence until an outcome of an investigation is reached;
- b) all Whistleblower Misconduct Reports being treated with confidentiality and being subjected to a full and fair, independent investigation; and
- c) fully investigating any claim made in an open and impartial manner.

5.4 Support

The DPO will provide the required support to a Discloser. A confidential support and counselling service will also be available to all the Company employees who raise concerns under this Policy. Further details of the confidential support and counselling services is included in the Whistleblower Reporting Guidelines.

The Company is unable to extend the full level of protection and support set out in this policy to Disclosers who are not directly employed by the Company at the time the report was made e.g. protection of working conditions.

A Discloser may seek independent legal advice or contact regulatory bodies, such as ASIC, APRA or the ATO, if they believe they have suffered detriment.

A Discloser can seek compensation and other remedies through the courts if:

- a) they suffer loss, damage or injury because of a disclosure; and
- b) the Company failed to take reasonable precautions and exercise due diligence to prevent the Detrimental Treatment.

5.5 Protections under the relevant legislations

The Corporations Act Part 9.4AAA and the Tax Administration Act (Australia) also gives special protection to Disclosers, provided certain conditions are met.

A Discloser qualifies for protection as a Whistleblower under the Corporations Act if they are an eligible whistleblower and:

- a) they have made a disclosure of information relating to a 'disclosable matter' directly to an 'eligible recipient' or to ASIC, APRA or another Commonwealth body prescribed by regulation;

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- b) they have made a disclosure to a legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the whistleblower provisions in the Corporations Act; or
- c) they have made an 'emergency disclosure' or 'public interest disclosure'.

Disclosures that are not about disclosable matters do not qualify for protection under the Corporations Act (or the Taxation Administration Act, where relevant).

5.5.1 Disclosable Matters

Disclosable matters involve information that the Discloser has reasonable grounds to suspect concerns misconduct, or an improper state of affairs or circumstances, in relation to the Company. A definition of Misconduct is included in Appendix 1.

Disclosable matters also include the following if a Discloser has reasonable grounds to suspect that the information indicates that the Company (including their employees or officers) has engaged in conduct that:

- a) constitutes an offence against, or a contravention of, a provision of any of the following:
 - (i) the Corporations Act;
 - (ii) the Australian Securities and Investments Commission Act 2001;
 - (iii) the Banking Act 1959;
 - (iv) the Financial Sector (Collection of Data) Act 2001;
 - (v) the Insurance Act 1973;
 - (vi) the Life Insurance Act 1995;
 - (vii) the National Consumer Credit Protection Act 2009;
 - (viii) the SIS Act;
 - (ix) an instrument made under an Act referred to in RG 270.54(a)(i)–RG 270.54(a)(viii);
- b) constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more;
- c) represents a danger to the public or the financial system; or
- d) is prescribed by regulation.

5.5.2 Legal Practitioner Disclosures

Disclosures to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions in the Corporations Act are protected (even in the event that the legal practitioner concludes that a disclosure does not relate to a 'disclosable matter').

5.5.3 Public Interest Disclosure/Emergency Disclosure

Disclosures to a journalist or parliamentarian under certain circumstances can qualify for protection – Public Interest Disclosure/Emergency disclosure.

A 'public interest disclosure' is the disclosure of information to a journalist or a parliamentarian, where:

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- a) at least 90 days have passed since the Discloser made the disclosure to ASIC, APRA or another Commonwealth body prescribed by regulation;
- b) the Discloser does not have reasonable grounds to believe that action is being, or has been taken, in relation to their disclosure;
- c) the Discloser has reasonable grounds to believe that making a further disclosure of the information is in the public interest; and
- d) before making the public interest disclosure, the Discloser has given written notice to the body (ASIC, APRA or another Commonwealth body prescribed by regulation) to which the previous disclosure was made) that:
 - (i) includes sufficient information to identify the previous disclosure; and
 - (ii) states that the Discloser intends to make a public interest disclosure.

An 'emergency disclosure' is the disclosure of information to a journalist or parliamentarian, where:

- a) the Discloser has previously made a disclosure of the information to ASIC, APRA or another Commonwealth body prescribed by regulation;
- b) the Discloser has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment;
- c) before making the emergency disclosure, the Discloser has given written notice to the body (ASIC, APRA or another Commonwealth body prescribed by regulation) to which the previous disclosure was made) that:
 - (i) includes sufficient information to identify the previous disclosure; and
 - (ii) states that the Discloser intends to make an emergency disclosure; and
- d) the extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the journalist or parliamentarian of the substantial and imminent danger.

it is important for the Discloser to understand the above criteria for making a public interest or emergency disclosure. A Discloser must have previously been made a disclosure to ASIC, APRA or a prescribed body and written notice provided to the body to which the disclosure was made. Also, in the case of a public interest disclosure, at least 90 days must have passed since the previous disclosure.

It is recommended that a Discloser should contact an independent legal adviser before making a public interest disclosure or an emergency disclosure.

5.5.4 Personal Work-Related Grievances

Disclosures that relate solely to personal work-related grievances, and that do not relate to detriment or threat of detriment to the Discloser, do not qualify for protection under the Corporations Act. Examples of personal work-related grievances include:

- a) an interpersonal conflict between the Discloser and another employee;
- b) a decision that does not involve a breach of workplace laws;
- c) a decision about the engagement, transfer or promotion of the Discloser;

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- d) a decision about the terms and conditions of engagement of the Discloser; or
- e) a decision to suspend or terminate the engagement of the Discloser, or otherwise to discipline the Discloser.

A personal work-related grievance may still qualify for protection if:

- a) it includes information about misconduct, or information about misconduct includes or is accompanied by a personal work-related grievance (mixed report);
- b) the Company has breached employment or other laws punishable by imprisonment for a period of 12 months or more, engaged in conduct that represents a danger to the public, or the disclosure relates to information that suggests misconduct beyond the Discloser's personal circumstances;
- c) the Discloser suffers from or is threatened with detriment for making; or
- d) the Discloser seeks legal advice or legal representation about the operation of the whistleblower protections under the Corporations Act.

5.5.5 Eligible Recipients

The role of an 'eligible recipients' is to receive disclosures that qualify for protection and also other disclosures that may not qualify for protection but will still be investigated under this Whistleblower Policy. The Discloser can make a disclosure directly with an 'eligible recipient' or alternatively can lodge a Whistleblower Misconduct Report. Options, and details on how to lodge a Whistleblower Misconduct Report are outline detailed in the Whistleblower Reporting Guidelines. An eligible recipient includes:

- a) an officer (Director or Company Secretary) or Executive of the Company;
- b) the internal or external auditor (including a member of an audit team conducting an audit) or actuary of the Company; and
- c) a person authorised by the Company to receive disclosures that may qualify for protection.

5.5.6 Protected Disclosure Act (New Zealand)

The Protected Disclosure Act (New Zealand) also gives special protection to Disclosers, provided certain conditions are met. Additional Information regarding the legislative protection for Disclosers is included in the Whistleblower Reporting Guidelines.

5.5.7 Incorrect Disclosures

A Discloser can still qualify for protection even if their disclosure turns out to be incorrect.

6. INVESTIGATION

All Whistleblower Misconduct Reports will be treated seriously and will be investigated thoroughly with the objective of locating evidence that either substantiates or refutes the claims/allegations made by a Discloser. The investigation will be conducted in a manner that is confidential, fair and objective. Confidentiality extends to all information received from the Discloser.

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The WIO is responsible for conducting the investigation. This will include determining the appropriate manner of investigation, determining the resources required to conduct the investigation including seeking assistance from current employees (including People and Impact or Internal Audit if required) or external professional service providers (e.g. lawyers, accountants, forensic analyst or operational experts). Part of the initial assessment will be to determine if the disclosure qualifies for protection.

In the event the Chief Executive Officer or a member of the Board is the subject of the investigation, then the WIO will liaise with the Board Chair regarding the investigation and determine corrective actions. If the Chair of the Board is the subject of the investigation, then the WIO will liaise with the CEO and Deputy Chair.

The WIO will keep the CEO and Board informed of the progress of the investigation and ultimate outcome. The WIO in consultation with the CEO and Board will determine the recipients of the final report, including the advice to External Authorities. The method for documenting and reporting the findings will depend on the nature of the disclosure. Where the Discloser has provided their contact details, the WIO will keep the Discloser informed of the investigation's progress in a timely manner.

Each individual disclosure is unique and no one investigation will likely be similar to another, however as a guide the following are the key steps and timeframes that will be followed for each investigation.

Investigation Step	Timeframe*
1. Notification: Inform the whistleblower that their complaint has been received and outline the next steps.	1 day. Post Disclosure
2. Initial Assessment: Evaluate the relevance and seriousness of the complaint. Decide if it can be handled internally or if external assistance is needed ¹ .	3 days Post Disclosure
3. Gathering Information: Conduct a detailed investigation by collecting evidence, interviewing relevant parties, and documenting findings	10 to 20 days. Post Disclosure
4. Evaluation: Assess the information gathered to determine the validity of the complaint and identify any misconduct.	5 to 10 days. Post Information Gathering
5. Report: Preparation of a formal report outlining the results of the investigation, recommendations and actions to be taken. Some examples of action that may be taken include disciplinary measures, policy changes, or reporting to external authorities.	10 to 15 days. Post Information Gathering
6. Feedback: Provide feedback to the whistleblower about the outcome of the investigation and any actions taken. Whilst it would be highly unusual that feedback is not provide to the Discloser, depending upon the disclosure and the results of the investigation there may be limited circumstances where feedback will not be provided to the Discloser	0 to 5 days Post Report

Investigation Step	Timeframe*
7. Follow-Up: Monitor the situation to ensure that all of the recommendations from the investigation have been actioned and that there are no further concerns	Ongoing

* Timeframes referenced in the table above refer to working days.

At each of the steps above, from Initial Assessment to Report the Discloser will be notified of the start of each process stage. There will also be regular contact with the Discloser throughout the Follow-Up stage.

7. DISCLOSER RESPONSIBILITIES

All Whistleblower Misconduct Reports must be made in good faith with a genuine and reasonable belief regarding the Misconduct and not with the intention to misuse this policy. The Discloser must ensure as far as possible, that the reports are factually accurate, complete, are based on first hand knowledge, presented in an unbiased manner and without material omission.

The Company takes all reports made under this Policy seriously. Disclosers must not make reports which are vexatious or which the Discloser knows to be untrue. Such a report will be considered serious and may result in disciplinary action (including dismissal from employment and/or legal action).

8. GOVERNANCE

Periodically the WIO will provide the ERC and Board a summary on the number of Whistleblower Misconduct Reports and type of Misconduct reported. The report should identify if there are any systemic issues arising from the Whistleblower Misconduct Reports.

WHISTLE BLOWER POLICY DEFINITIONS

Detrimental Treatment

Is the adverse treatment of a Discloser and includes, demotion, harassment, discrimination, disciplinary action, bias, threats or other unfavourable treatment connected with making a report. The following actions however are not considered to be Detrimental Treatment:

- (a) managing the unsatisfactory work performance of a Discloser in line with the Company's People and Impact Team Policy for performance management; and
- (b) administration action that is reasonable to protect the Discloser from Detrimental Treatment.

Discloser

A Discloser for the purpose of this Policy, is defined as anyone who makes or attempts to make a report of Misconduct.

In addition to the protection under this Policy, certain legislations may offer statutory protection to the Disclosers. the Company will comply with all applicable legislative requirements.

Discloser Protection Officer (DPO)

The current DPO is the Head of People and Impact. The DPO is responsible for protecting and safeguarding the interests of the Discloser.

Misconduct

Misconduct is defined as any past, present or likely future activity or behaviour that is considered to be:

- (a) dishonest;
- (b) contrary to the Code of Conduct of the Company;
- (c) corrupt (including soliciting, accepting or offering a bribe, facilitation payments or other such benefits);
- (d) a bribe or kickback (acceptance of any compensation, whether monetary or otherwise, in exchange for the provision of preferential treatment.
- (e) illegal (including theft, sale or use of drugs, violence or threatened violence and property damage);
- (f) a breach of any law, regulations, internal policies or codes (such as the Company's Code of Conduct);
- (g) impeding internal or external audit process;
- (h) impropriety relating to accounting, internal control, compliance, actuarial, audit or other matters of concern to the Discloser;
- (i) a serious impropriety or an improper state of affairs or circumstances;
- (j) having a conflict of interest that is not disclosed and has influenced a particular decision or action that the person with the conflict of interest is a party to;
- (k) endangering health or safety;
- (l) damaging or substantially risking damage to the environment;
- (m) a serious mismanagement of the Company resources;
- (n) detrimental to the Company's financial position or reputation;

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- (o) maladministration (an act or omission of a serious nature that is negligent, unjust, oppressive, discriminatory or is based on improper motives); or
- (p) concealing Misconduct.

Whistleblower Investigation Officer (WIO)

The current WIO is the Chief Risk Officer. The WIO is responsible for overseeing the investigation and subsequent internal and if necessary external reporting of any report lodged under this Policy. The WIO will have access to independent, financial, legal and operational advisers as required.

Detrimental Treatment

Detrimental Treatment can include any of the following:

- (a) dismissal of an employee;
- (b) injury of an employee in his or her employment;
- (c) alteration of an employee's position or duties to his or her disadvantage;
- (d) discrimination between an employee and other employees of the same employer;
- (e) harassment or intimidation of a person;
- (f) harm or injury to a person, including psychological harm;
- (g) damage to a person's property;
- (h) damage to a person's reputation;
- (i) damage to a person's business or financial position; or
- (j) any other damage to a person.

The above are examples of Detrimental Treatment, however if a Discloser believes they have suffered, or been a victim of, Detrimental Treatment outside the above examples then they should raise the matter directly with their People Leader, Executive, People Team or through the provisions of this Whistleblower Policy.

There are certain actions that are not considered Detrimental Treatment. These actions could include:

- administrative action that is reasonable for the purpose of protecting a discloser from detriment (e.g. moving a discloser who has made a disclosure about their immediate work area to another office to prevent them from detriment); and
- managing a discloser's unsatisfactory work performance, if the action is in line with the Company's performance management framework.

In the above cases and other similar circumstances the Company will ensure the Disclose understands the action taken by the Company and why it is not considered to be Detrimental Treatment.