



AMA GROUP

Whistleblower Policy

September 2025

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1. INTRODUCTION

- 1.1. AMA Group Limited, together with its controlled entities (“AMA Group” or “Company”) recognises the importance of identifying wrongdoing or conduct that is not consistent with AMA Group’s corporate culture and values.
- 1.2. AMA Group is committed to the highest standards of conduct and ethical behaviour across its Group and promoting and supporting a culture of honest and ethical behaviour to ensure strong corporate compliance, governance and accountability.
- 1.3. The Policy summarises the protections offered by the Company to whistleblowers, including key provisions under the Corporations Act 2001 (Cth) (“Corporations Act”) and Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 (Cth), (collectively “Whistleblower Laws”).
- 1.4. Whistleblowing can play a critical role in the early detection and prosecution of misconduct in businesses and how it can improve compliance with the law and promote an ethical culture because of the higher likelihood of misconduct being reported.

2. PURPOSE

- 2.1. The purpose of this Policy is to support the internal governance framework of AMA Group.
- 2.2. This Policy describes the ways in which Disclosers can confidently report any instances of suspected misconduct including unethical, illegal, fraudulent or undesirable conduct involving AMA Group’s businesses (“Reportable Conduct”) or suspected Reportable Conduct without fear of intimidation, disadvantage or reprisal.
- 2.3. This Policy also outlines how AMA Group will respond to and investigate reports of Reportable Conduct or suspected Reportable Conduct.
- 2.4. This Policy is intended to ensure AMA Group’s commitment to compliance with the applicable laws and practices relating to Disclosers and Reportable Conduct, including compliance with the Whistleblower Laws.

3. APPLICATION

- 3.1. This Policy applies to “Disclosers”, which means anyone who is, or has been, any of the following with respect to the AMA Group :
 - a) all directors, senior executives, employees or officers of AMA Group (e.g. current and former employees who are permanent, part time, fixed-term or temporary, interns, secondees, managers and directors);
 - b) all suppliers and contractors of services or goods to the Company (whether paid or unpaid) including their employees (e.g. current and former contractors (and their employees), consultants, service providers and business partners);
 - c) associate of AMA Group;
 - d) all Discloser as defined under this Policy and the Whistleblower Laws; and
 - e) family members and dependents of any of the above (consistent with the Corporations Act definition).

who makes attempts to make, or intends to make, a disclosure of Reportable Conduct in accordance with this Policy.

4. POLICY STATEMENT

- 4.1. AMA Group is committed to a strong culture of corporate compliance and ethical behaviour. AMA Group has zero tolerance for:
- a) willful breaches of its **Code of Conduct** (including fraud, corruption and bribery). AMA Group's Employees are expected to conduct themselves in a matter consistent with the Code of Conduct; and
 - b) intentional material breaches (through action or unconscious action) of regulatory, or legislative requirements which threatens our license to operate; and
 - c) any form of discrimination or victimisation against a Discloser in accordance with this Policy.
- 4.2. AMA Group strongly encourages all employees who have witnessed, or know about, any Reportable Conduct or suspected Reportable Conduct to report this immediately. AMA Group, or its delegate, will investigate all reports and will deal with such reports seriously.

5. REPORTABLE CONDUCT

- 5.1. Disclosers may make a report under this Policy if they have reasonable grounds to suspect that the disclosed information concerns misconduct, an improper state of affairs or circumstances in relation to AMA Group, including systemic issues or breaches of law, regulation, or policy.
- 5.2. Reportable Conduct may include (without limitation):
- a) dishonest, fraudulent or corrupt activity, including bribery;
 - b) illegal or unlawful activity (such as theft, drug trafficking, illegal drug use, violence, harassment or intimidation, criminal damage to property or other breaches of state or federal law);
 - c) unethical behaviour or breach of AMA Group's policies (such as dishonestly altering company records or data, adopting questionable accounting practices or wilfully breaches of the Code of Conduct or other key policies);
 - d) potentially damaging conduct to AMA Group, AMA Group's employee or a third party, such as unsafe work practices, environmental damage, health risks or abuse of AMA Group property or resources;
 - e) conduct that amounts to an abuse of authority;
 - f) conduct that may cause financial loss to AMA Group or damage its reputation or be otherwise detrimental to AMA Group's interests;
 - g) improper conduct in relation to AMA Group's tax affairs; or
 - h) conduct that involves any other kind of serious impropriety.
- 5.3. Reasonable grounds requires Discloser to have an objective basis for the report of misconduct. Reports made without reasonable grounds may not qualify for legal whistleblower protection. However, Disclosers are protected where a report is made honestly and on reasonable grounds, even if the allegation is not substantiated
- 5.4. Complaints regarding personal work-related grievances such as interpersonal conflicts generally do not qualify for protection under the Corporations Act, unless they involve victimisation of a Discloser or reveal misconduct beyond personal grievance.

- 5.5. Complaints regarding occupational health and safety may be raised through internal safety procedures but may also constitute Reportable Conduct where systemic or unlawful issues are involved.

6. PROTECTED DISCLOSURE

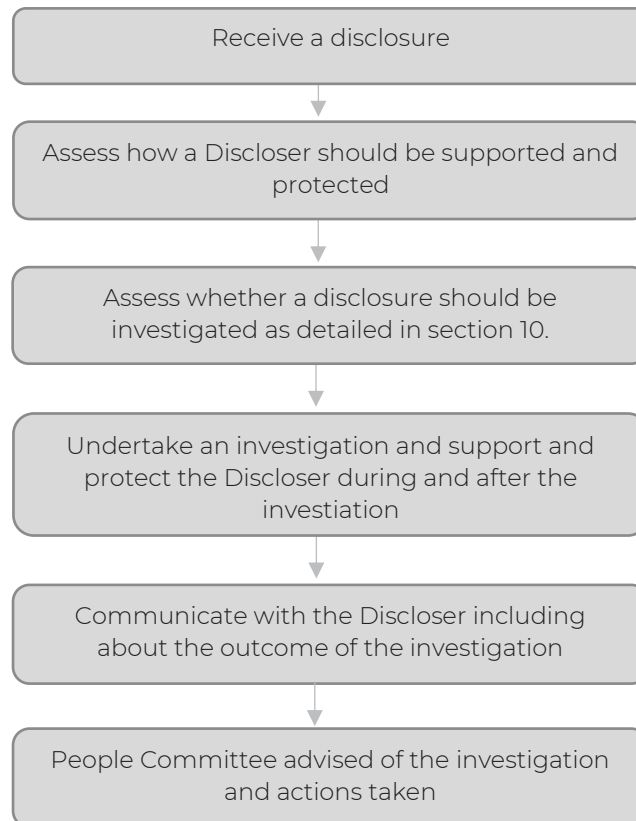
- 6.1. A Discloser will have protection as a whistleblower if he/she has made a disclosure of information relating to a Reportable Conduct directly to an Eligible Recipient (referred to as a **Protected Disclosure**).
- 6.2. A Protected Disclosure also occurs if a Discloser has made a disclosure of information relating to a Reportable Conduct:
- a) directly to a legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the whistleblower provisions prescribed under the Whistleblower Laws; or
 - b) or made an Emergency Disclosure or Public Interest Disclosure.
- 6.3. There is no requirement for a Discloser to identify themselves in order for a disclosure to qualify for protection under the Whistleblower Laws.
- 6.4. Discloser can still qualify for protection even if the disclosure turns out to be incorrect.

7. MATTERS THIS POLICY DOES NOT APPLY TO

- 7.1. Personal Work-Related Grievances are not Reportable Conduct and, accordingly, are not covered under this Policy. This should be reported to Line Managers or HR representative for review and appropriate action.
- 7.2. Personal Work-Related Grievances means a grievance about any matter in relation to the Discloser's employment, or former employment, having (or tending to have) implications for the Discloser personally. This includes:
- 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; and
 - d) a decision to suspend or terminate the engagement of the Discloser, or otherwise to discipline the Discloser.
- 7.3. However, it does not include:
- a) any conduct that would be considered victimisation of an individual because they have made, may have made, or proposed to make a report under this Policy; or
 - b) a matter that would have significant implications for any AMA Group's entity.
- 7.4. AMA Group will treat all disclosures seriously and endeavour to protect anyone who raises concerns in line with this Policy.
- 7.5. A Discloser can still qualify for protection under this Policy where their disclosure turns out to be incorrect. However, deliberate false or vexatious reports will not be tolerated. Deliberate false reports involve a Discloser reporting information they know to be untrue. It does not include situations where a Discloser reasonably suspects misconduct, but the suspicions are later determined to be unfounded. Anyone found making a deliberate false claim or report will be subject to disciplinary action, which could include dismissal.

8. REPORTING PROCESS

- 8.1. The process for reporting and handling any Reportable Conduct or suspected Reportable Conduct is set out below.



NOTES:

1. In the event that the disclosure relates to a director or senior executive, the Chair of the Board (or in the event the disclosure relates to the Chair of the Board, the Chair of the People Committee) shall be consulted during this assessment.
 2. Where a disclosure relates to the conduct of any Employees that may be party to the investigation process as outlined in Section 10, the matter must be investigated with sufficient independence. Where necessary, this may involve engaging a member of AMA Group's Audit & Risk Committee.
- 8.2. All Disclosers are strongly encouraged to report any Reportable Conduct or suspected Reportable Conduct using the reporting mechanisms set out below.
- Reporting matters of concern**
- 8.3. AMA Group has a number of channels for making a report if you become aware of any issues or behaviour which you consider to be Reportable Conduct. Reports can be made to any of the following Eligible Recipient:

Eligible Recipient:	Persons in this category include:
(a) Whistleblower Protection Officer (Internal)	Phone: +61 3 7066 5000 Email: hotline@amagroupltd.com Post: Whistleblower Protection Officer Private & Confidential PO Box 6311, Melbourne VIC 3004
(b) Whistleblower Protection Officer (this is an independent External Whistleblowing Service - PKF)	PKF Integrity Telephone: 1800 325 143 Email: amagroup hotline@pkf.com.au Online: https://www.pkftalkintegrity.com/?amag
(c) An officer or senior manager of the Company or a related body corporate	Line Manager HR Representative Chief People Officer Chair of the Board Chair of the ARC
(d) An auditor, or a member of an audit team conducting an audit, of AMA Group	The current auditor of the Company is: KPMG Phone: +613 9288 5555 Email: maraneda@kpmg.com.au ; Address: Tower Two, Collins Square, 727 Collins St Docklands VIC 3008

- 8.4. When a report is made to an eligible recipient, the Discloser must first inform the eligible recipient that they wish to make a report under this Policy.
- 8.5. An eligible recipient may then either receive the disclosure or direct the Discloser to make the report to the Whistleblower Protection Officer or External Whistleblowing Service, if they consider it appropriate in the circumstances.
- 8.6. If the disclosure concerns an officer or senior manager of AMA Group, the disclosure should not be made directly to that person.
- 8.7. An Eligible Recipient also includes ASIC, APRA, the AFP and the ATO.
- 8.8. A disclosure 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 or the Taxation Administration Act is protected (even in the event that the legal practitioner concludes that a disclosure does not relate to a Reportable Matter).

Confidentiality and anonymity

- 8.9. A report can be made anonymously. However, it may be difficult for AMA Group to properly investigate or take other action to address the matters disclosed in anonymous reports. In circumstances where the Discloser has not consented to the disclosure of their identity, the matter may be referred for investigation, but the investigator will be required to take all

reasonable steps to reduce the risk that the Discloser will be identified as a result of the investigation.

9. PUBLIC INTEREST AND EMERGENCY DISCLOSURE

Public interest disclosure

- 9.1. Public Interest Disclosure is a disclosure of information to a Journalist or a Parliamentarian, where:
- a) least 90 days have passed since the Discloser made the disclosure to ASIC, APRA or another Australian 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 the disclosure;
 - c) The Discloser has reasonable grounds to believe that making a further disclosure of the information is in public interest; and
 - d) Before making the public interest disclosure, the Discloser has given written notice to the body noted at (a) above that.
- 9.2. A public interest disclosure may then be made to either:
- a) a member of the parliament of the Australian Commonwealth or an Australian State or Territory ("**Parliamentarian**");
 - b) a journalist, as defined in in the Corporations Act ("**Journalist**").

Emergency disclosure

- 9.3. An Emergency Disclosure may be made to Parliamentarian or a Journalist if:
- c) the Discloser have have first made a qualifying disclosure to ASIC, APRA, the Commissioner of Taxation or a prescribed Commonwealth authority;
 - d) a reasonable period must have passed since that disclosure was made;
 - e) the Discloser have reasonable grounds to believe that 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
 - f) after the end of the reasonable period, you gave notice to the body of your intention to make an emergency disclosure, including sufficient information to identify the original disclosure.

10. HANDLING AND INVESTIGATING DISCLOSURES

Handling a Disclosure

- 10.1. AMA Group will consider all disclosures of information made under this Policy as soon as possible upon receipt of the disclosure of information by the Eligible Recipient.
- 10.2. Once it is established that an investigation is warranted, the Eligible Recipient is responsible for determining the management of an investigation into a disclosure of information, and will consider:
- a) the nature and scope required for the investigation;
 - b) the person(s) within and/or outside the Company that should lead the investigation;

- c) the nature of any technical, financial or legal advice that may be required to support the investigation; and
- d) the timeframe for the investigation.

Investigation of a Disclosures

- 10.3. The investigation will be conducted in an objective and fair manner, and consistent with natural justice, procedural fairness, and applicable legal standards having regard to the nature of the Reportable Conduct and the circumstances.
- 10.4. A whistleblower may be identified in the course of the investigation, even when their identity has not been disclosed, or a report was made anonymously. Where this occurs, the whistleblower's identity will continue to be subject to strict confidentiality requirements under the Corporations Act 2001 (Cth).
- 10.5. Due process will be observed before any action is taken against a person against whom a disclosure is made. Such action will only occur where there is sufficient and reliable evidence of the alleged misconduct or improper state of affairs or circumstances.
- 10.6. Any disclosure that requires an investigation will be documented. The report will include information such as:
 - a) a detailed description of the incident that outlines the facts, background information and key issues;
 - b) date(s) or time period that the incident occurred or is likely to occur;
 - c) whether the issue is a once-off incident or is ongoing; and
 - d) any other information which is considered relevant.
- 10.7. Each disclosure will be acknowledged within a reasonable period after the disclosure is received (if the Discloser can be contacted, including through anonymous channels).
- 10.8. Information contained in reports and provided by Disclosers in the course of an investigation will be kept confidential, except as required by law or where disclosure is necessary to regulatory authorities, law enforcement agencies or professional advisors to AMA Group.

Outcome of Investigation and Reporting

- 10.9. Where investigations substantiate the disclosure, a suitable response and actions to address the matter must be implemented in a timely manner.
- 10.10. Findings from all investigations (whether substantiated or not) will be documented and reported to the AMA Group's People Committee, while maintaining confidentiality of the Discloser.
- 10.11. AMA Group will endeavour to keep the Discloser properly informed of the outcome of the investigation of their report, subject to considerations of privacy and due process of those against whom allegations have been made and the customary confidentiality practices of AMA Group. If the Discloser is not an AMA Group's employee, then the same feedback procedures will apply once the Discloser has agreed in writing to maintain confidentiality in relation to any information provided regarding their report.
- 10.12. An investigation can result in three outcomes:
 - 10.12.1. **Reportable Conduct proven**
 - a) Where Reportable Conduct is proven:

- disciplinary action may be taken in accordance with the Group's performance management processes.

10.12.2. Reportable Conduct not proven but there is some doubt

- a) Where an investigation into Reportable Conduct is inconclusive:
- b) further ongoing observation or investigation may be required; and
- c) a report will be prepared, and AMA Group may decide upon further steps.

10.12.3. Reportable Conduct is not proven

- a) Where an investigation into Reportable Conduct is not proven:
 - all information and records will be handled and kept confidentially by the Chief People Officer; and
 - an assessment will be made if the allegation was vexatious and further action considered as appropriate.

11. SUPPORT AND PROTECTIONS TO DISCLOSERS

- 11.1. AMA Group will not take action against a Discloser, including disciplinary actions as a result of receiving a report of Reportable Conduct from the Discloser, provided that the Discloser has not themselves engaged in serious misconduct or illegal conduct.
- 11.2. Under the Whistleblower Laws, if the Discloser makes a Protected Disclosure to an Eligible Recipient, they will receive certain protections in relation to their identity and victimisation for making the disclosure. In particular, the Discloser will be protected from any of the following in relation to the disclosure:
 - 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 you for unlawfully releasing information, or other use of the disclosure against the Discloser in a prosecution – other than for making a false disclosure); and
 - c) administrative liability (e.g. disciplinary action for making the disclosure).

Protections given to Disclosers

- 11.3. AMA Group is committed to endeavoring to protect:
 - a) the identity of the Discloser who wishes to remain anonymous (where permitted by law); and
 - b) the Discloser from any detriment, disadvantage or victimisation resulting from a report made in accordance with this Policy such as disciplinary action or sanctions, dismissal, demotion or adverse change in work duties.
- 11.4. It will be a breach of this Policy for any Employees to subject a Discloser to any detriment, disadvantage or victimisation because the Employees believes that the Discloser has made, may have made, proposes to make or could make a report under this Policy

Support for Disclosers

- 11.5. Support available for Disclosers includes:
 - a) connecting the Discloser with access to the Employee Assistance Program;

- b) appointing an independent HR representative to deal with any ongoing concerns they may have; and
- c) connecting the Discloser with third party support such as Lifeline and Beyond Blue.

Ensuring fair treatment of persons mentioned in a disclosure

- 11.6. No action will be taken against Employees who are implicated in a report under this Policy until an investigation has determined whether any allegations against them are substantiated. However, an employee or officer who is implicated may be temporarily stood down on full pay whilst an investigation is in process, or may be temporarily transferred to another office, department or workplace, if appropriate in the circumstances. Any such stand-down or temporary transfer may only continue for the duration of the investigation. If the investigation determines that the allegations are not substantiated, the employee or officer must be immediately reinstated to full duties.
- 11.7. Any disclosures that implicate Employees must be kept confidential, even if the Discloser has consented to the disclosure of their identity and should only be disclosed to those persons who have a need to know the information for the proper performance of their functions under this Policy, or for the proper investigation of the report.
- 11.8. Employees who are implicated in a disclosure have a right to be informed of the allegations against them and must be given an opportunity to respond to those allegations and provide additional information, if relevant, in the course of an investigation into those allegations (subject to the Discloser's right to anonymity).

Support available for persons implicated in a report under this Policy includes:

- a) connecting the person with access to the Employee Assistance Program;
- b) appointing an independent HR representative to deal with any ongoing concerns they may have; and
- c) connecting the person with third party support such as Lifeline and Beyond Blue.

12. DISSATISFACTION

- 12.1. If a Discloser is dissatisfied with the way that the Company is dealing with his or her disclosure, then those concerns should be expressed in writing to the Eligible Recipient.
- 12.2. If such concerns arise in respect of an investigation of a disclosure, then the Company may determine to review the investigation to ensure it was conducted in accordance with this Policy and the processes and procedures set out in it.
- 12.3. If a Discloser continues to be dissatisfied with the way that the Company is dealing with his or her disclosure or concerns, they may make further disclosure to External Authorities.

13. EXTERNAL ADVICE

- 13.1. The Company itself may engage with External Authorities to report or resolve the wrongdoing. If this is necessary, then the Company reserves the right to involve one or more External Authorities with or without the prior consent of the Discloser. Where possible, the Company will seek to preserve the anonymity of the Discloser but will make legally required disclosures which may include the identity of the Discloser and the disclosure.
- 13.2. If External Authorities are engaged, then responsibility for confidentiality and anonymity of the Discloser shall be in the hands of the External Authorities and their subsequent activities.

14. BREACH OF THIS POLICY

- 14.1. A breach of this Policy is regarded as a serious disciplinary matter and will be dealt with in accordance with the Code of Conduct or other relevant policies.

15. TRAINING AND AWARENESS

- 15.1. This Policy will be made available to all Employees via the following channels:
- a) posting the Policy on the staff intranet or other communication platform;
 - b) posting the Policy on staff noticeboards, as appropriate;
 - c) referencing the Policy in the Code of Conduct; and
 - d) incorporating the Policy in any induction information packs and training for new starters.
- 15.2. Training may be provided periodically to those with whistleblowing responsibilities, such as Managers or designated contacts, to enable them to provide guidance to other AMA Group's Employees.
- 15.3. This Policy is also available on AMA Group's website.

16. POLICY REVIEW

- 16.1. This Policy will be reviewed at least once every two years (or earlier if required) to determine its adequacy for current circumstances and make any appropriate amendments.

17. DEFINITIONS

Term	Definition
ASIC	means the Australian Securities and Investments Commission.
AFP	means the Australian Federal Police.
APRA	means the Australian Prudential Regulation Authority.
ATO	means the Australian Taxation Office.
Eligible Recipient	is defined in section 8.3 of this Policy.
Journalist	is defined in section 9.2(b) of this Policy.
Parliamentarian	is defined in section 9.2(a) of this Policy.
Personal Work-Related Grievance	is defined in section 7.2 of this Policy.
Protected Disclosure	is defined in section 6 of this Policy.
Public Interest Disclosure	is defined in section 9.1 of this Policy.

Version	V3 - 2025	Effective Date	September 2025
Approved By	AMA Group Board	Maintained By	AMA Group Board

