

EMPLOYEE POLICY

WHISTLEBLOWING POLICY - AUSTRALIA

GLOBAL

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1. ORGANISATION COMMITMENT

Objective encourages you to raise any genuine concerns you might have about certain wrongdoings within the company without fear of reprisal. This policy provides you with guidance on how to raise those concerns and to enable us to investigate such concerns and deal with them appropriately.

Objective will publish this policy as part of our People & Culture Policies so that it will be accessible to you at all times.

Objective will also reasonably regularly publicise the existence of the policy to all employees and officers in our Australian locations.

2. ELIGIBILITY

This policy applies to all employees, contractors, directors and officers, in Objective's Australian locations from 31 December 2019.

Objective's Whistleblower Policy - Global, which has been in place since 2011, will continue to apply to employees, contractors, directors and officers in all non-Australian locations.

NOTE: This new policy complies in its particulars with Part 9.4AAA of the Australian Corporations Act (Protection for Whistleblowers) which comes into effect on and from 1 January 2020.

3. INTERACTION WITH THE GRIEVANCE AND BULLYING AND HARASSMENT PROCEDURE

You should not use this procedure for complaints relating to your own circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance or the Bullying and Harassment Policy as appropriate. If you are uncertain whether or not something is within the scope of this Policy, you should seek advice from People and Culture.

The Leader, People & Culture works from the North Sydney office.

4. POLICY

If you reasonably believe that Objective, as a corporate entity or any of our directors and officers, or any of our workers or contractors has done any of the following things listed below, or they are intending to do something that you reasonably believe could lead or amount to any of the following things listed below, or they are wilfully failing to do anything that you reasonably believe would prevent any of the following:

- a criminal offence
- a failure to comply with any legal obligations
- a miscarriage of justice
- danger to the health and safety of any individual
- damage to the environment
- the deliberate concealment of information concerning any of the matters listed above
- misconduct
- an improper state of affairs

then you can disclose this information as detailed below in this policy and your disclosure will be an eligible disclosure protected by this policy.

If you make such an eligible disclosure, you should provide full details and, where possible, supporting evidence.

NOTE: This policy is not to be used if you don't have any reasonable beliefs about the list of issues above, nor is it to be used if you are only using it because you have an interpersonal conflict with another Objective employee or officer or because you don't like a decision related to your employment or you dislike any of the terms of your employment.

This policy is about protecting real whistleblowers. It is in Objective's interest to care about real whistleblowers so we can operate in accordance with our values.

4.1 HOW AND TO WHOM CAN YOU MAKE A DISCLOSURE

You can make your disclosure by telephone or by email to one the following Objective personnel:

- Objective's head lawyer (i.e Objective's General Counsel);
- Objective's Chief Operations Officer
- other Objective Senior Manager (e.g head of professional services, head of Enterprise Sales)

NOTE: General Counsel and COO work from the North Sydney, Australia, office of Objective.

You can make your disclosure to an external auditor of Objective.

You can make your disclosure to ASIC and APRA and any prescribed body under the whistleblower regulations of the Corporations Act.

You can make a public interest disclosure to a journalist or to a politician but only if:

- you have already disclosed to any of the above persons and
- 90 days has passed since that disclosure and
- you don't have a reasonable basis to believe any action is being taken and
- you do have a reasonable basis to believe further disclosure is necessary in the public interest and
- you let Objective (i.e the original recipient(s)) know that you're going to make your further disclosure and
- the extent of the information you disclose is not more than needed to inform the original recipient(s) of the issue that you are raising.

You can make an emergency disclosure to a journalist or to a politician but only if:

- you have already disclosed to any of the above persons and
- you do have a reasonable basis to believe that your information concerns a substantial and imminent danger to the health and safety of one or more persons or to the natural environment and
- you let Objective (i.e the original recipient(s)) know that you're going to make your further disclosure and
- the extent of the information you disclose is not more than needed to inform the original recipient(s) of the issue that you are raising.

4.2 HOW OBJECTIVE WILL INVESTIGATE WHISTLEBLOWER ALLEGATIONS

Objective will investigate your allegation promptly.

After hearing from you as to your disclosure information the recipient of your disclosure will alert relevant persons at Objective to review and comment on the material. In particular they will alert Objective's General Counsel (if you did not make your disclosure to Objective's General Counsel yourself) who will be responsible for managing the investigation, or delegating to external legal advisors or another Objective representative to do so.

We will keep your identity confidential unless you are comfortable to let us disclose it or unless we need to disclose it to our external legal advisors or other external authorities so they can understand the information that you are 'blowing the whistle' on.

During the course of our investigation we may require your assistance.

We will keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result.

You should treat information about the investigation as confidential.

While we cannot always guarantee the outcome that you may expect, we will deal with your concern fairly and in an appropriate way. By following this policy you can help us to achieve this.

If, at any time, you are not happy with the way in which your disclosure has been or is being handled by Objective's General Counsel, you can raise your concerns to Objective's Chief Executive Officer and/or Objective's Chief Financial Officer.

Objective's Chief Financial Officer works from the North Sydney, Australia, office of Objective.

We will inform you of the outcome of the investigation as soon as practicable. We will take whatever action we consider to be appropriate.

4.3 HOW OBJECTIVE WILL SUPPORT A WHISTLEBLOWER AND PROTECT AGAINST DETRIMENT

Objective will support you if you make an eligible disclosure under this policy by accepting your disclosure and acting on it promptly and by assessing it fairly and taking appropriate actions in response and keeping you informed throughout the process.

We will also support you by respecting your wish for anonymity in accordance with this policy.

We will protect against detriment to you by avoiding any conduct that threatens to cause you detriment or that actually causes you detriment because of your eligible disclosure.

4.4 THE PROTECTIONS AVAILABLE TO A WHISTLEBLOWER

If you make an eligible disclosure you will be protected from conduct by Objective that threatens to cause you detriment or that actually causes you detriment because of your eligible disclosure.

You will also be protected from failure to respect your wish for anonymity as far as reasonably practicable and in accordance with this policy.

For more information about specific protections you can read the material at this link:

http://classic.austlii.edu.au/au/legis/cth/consol_act/ca2001172/s1317ai.html

4.5 HOW WILL OBJECTIVE ENSURE FAIR TREATMENT OF A WHISTLEBLOWER

Objective will ensure fair treatment of a whistleblower by letting all employees and officers know about the policy and how it operates so everyone at Objective in Australia can properly follow this policy.

4.6 ACTION WE MAY TAKE

If you reasonably believe that the nature of your concern relates to any of the areas set out above in this policy and you disclose this information to an appropriate person under this Policy, no action will be taken against you to your detriment for making the disclosure nor will you be threatened with detrimental action.

We will, however, take appropriate action against any person found to be:

- victimising another person for using this policy (please tell People & Culture if you think you have been victimised, or raise it formally under the Grievance Policy or the bullying and Harassment Policy if the matter is not remedied);
- deterring any person from reporting genuine concerns under this policy (please tell People & Culture if you think you have been deterred, and raise it formally under the Grievance Policy or Bullying and Harassment Policy if the matter is not remedied), or
- making a disclosure/allegation using this policy or otherwise, and doing so maliciously, vexatiously, in bad faith or with a view to personal gain.

For employees this action may involve us taking disciplinary action, which may result in dismissal.

5. STATUS OF THIS PROCEDURE

The company reserves the right to alter any of its terms at any time in accordance with obligations of compliance with the law, although we will notify you in writing of any changes.