Northern Inland
CREDIT UNION

ABN 36 087 650 422 I AFSL & Australian Credit Licence 235022

Whistleblower Policy

Our Commitment

Northern Inland Credit Union Limited (NICU) is committed to best practice in corporate governance, compliance, ethical behaviour and risk culture. We support eligible people to raise concerns about misconduct, improper conduct or circumstances relating to NICU without being subject to victimisation, harassment or discriminatory treatment. To achieve this, we will comply with Part 9.4AAA of the *Corporations Act 2001 (Cth)* .

Purpose and Outline of this Policy

This Whistleblower Policy ("Policy") establishes a mechanism within the NICU in which Eligible Whistleblowers can safely raise concerns and challenge misconduct and improper practices.

The Policy sets out:

- who may be protected when making a whistleblower disclosure
- the types of concerns that may qualify
- how those concerns can be reported
- how NICU may investigate a report
- the protections available to Eligible Whistleblowers
- the support available to Eligible Whistleblowers

Eligible Whistleblowers

The protections in this Policy apply to Eligible Whistleblowers. An individual is an Eligible Whistleblower and is entitled to the protections set out in the Policy if:

1. they are a person who is, or has been, any of the following in relation to NICU:
    - employee;
    - director or officer;
    - contractor, including an employee of a contractor;
    - supplier, including an employee of a supplier;
    - associate;
    - consultant;
    - a relative, dependant, spouse, or dependant of a spouse of any of the above; and
2. who make a Protected Disclosure.

Protected Disclosure

A disclosure by an Eligible Whistleblower will be a Protected Disclosure when a report is made to an Eligible Recipient that includes conduct that involves, but is not limited to:

- dishonest behaviour
- fraudulent activity
- unlawful, corrupt or unethical use of company funds or practices
- improper or misleading accounting or financial reporting practices
- behaviour that is oppressive, discriminatory or grossly negligent
- unsafe work practices
- a serious risk to the health and safety of any person at the workplace
- a serious risk to public health, public safety or the environment
- conduct that may cause financial loss to NICU, damage NICU's reputation or otherwise be detrimental to NICU's interests

Personal work-related grievances

Personal work-related grievances, such as interpersonal conflict or decisions about engagement, transfer, promotion, terms and conditions, suspension or termination of employment, usually fall outside this Policy and should be raised through the relevant employee grievance process. However, a personal work-related grievance may be covered if it relates to Detrimental Treatment because a person has made, proposes to make, or is suspected of making a disclosure under this Policy.

How to report a Protected Disclosure

Internal reporting channels

Eligible Whistleblowers should report Protected Disclosures to an Eligible Recipient. The following are Eligible Recipients:

- directors;
- officers;
- senior managers; or

- Whistleblower Protection Officer designated by NICU.

Reports to an Eligible Recipient may be made in person, by telephone, email or other means approved by NICU. There is no requirement for an Eligible Whistleblower to identify themselves. The Eligible Whistleblower should tell the Eligible Recipient that they wish to make a report under this Policy.

An Eligible Whistleblower is not required to prove their allegations before making a report. However, disclosures should contain sufficient information to enable the matter to be assessed and, where appropriate, investigated.

While a disclosure may be based on a reasonable suspicion rather than proven facts, whistleblowers should have reasonable grounds for their concerns and should provide information that is, to the best of their knowledge, honest and accurate. Deliberately making a report that the person knows to be false or misleading may constitute a breach of this Policy and may result in disciplinary action. A disclosure will not lose protection merely because it is subsequently found to be incorrect, provided it was made on reasonable grounds.

Additional eligible recipients

An Eligible Whistleblower may also make a Protected Disclosure to:

- the Australian Securities and Investments Commission (ASIC);
- the Australian Prudential Regulation Authority (APRA);
- the Australian Taxation Office (ATO), where the disclosure relates to the tax affairs of NICU and is otherwise protected under applicable whistleblower laws;
- an auditor, member of an audit team, or actuary of NICU; or
- a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of the whistleblower protections under applicable law.

How reports are investigated

When NICU receives a report, the Eligible Recipient will consider whether the report relates to a Protected Disclosure. If it does, the report will be investigated as appropriate. Depending on the nature and substance of the report, the investigation may be conducted internally or by an externally appointed investigator.

All investigations will be conducted in an objective and fair manner and will be reasonable and appropriate having regard to the nature of the Protected Disclosure and the circumstances. Where appropriate, and subject to privacy and confidentiality considerations, the Eligible Recipient or appointed investigator may provide feedback to the Eligible Whistleblower about the progress and/or outcome of the investigation.

If the Eligible Whistleblower has concerns as to how the investigation is being conducted or is not satisfied with the outcome, they may disclose the suspected improper conduct to ASIC, APRA or the ATO at any time.

Confidentiality

NICU will take all reasonable steps to protect an Eligible Whistleblower's identity following a report of a matter that is considered a Protected Disclosure.

Where an Eligible Whistleblower wishes to remain anonymous, the Eligible Whistleblower's identity will not be disclosed to the investigator or to any other person, except where disclosure is permitted or required by law, where the Eligible Whistleblower has consented, or where information is disclosed to ASIC, APRA, the Australian Federal Police, or a legal practitioner in accordance with applicable whistleblower protection laws.

Protections and support

Eligible Whistleblowers who make a Protected Disclosure may be entitled to legal protections under applicable whistleblower laws, including protection from certain civil, criminal and administrative liability for making the Protected Disclosure.

NICU will not subject an Eligible Whistleblower to disciplinary action, nor tolerate retaliation against an Eligible Whistleblower, for making a report covered by this Policy. Retaliation occurs where a person causes or threatens Detrimental Treatment to another person because a report of a Protected Disclosure has been made. Detrimental Treatment may include:

- dismissal
- injury of an employee in their employment
- alteration of an employee's position or duties to their disadvantage
- discrimination between an employee and other employees of the same employer
- harassment or intimidation
- damage to a person's property, reputation, business or financial position
- any other damage to a person

Detrimental treatment will be treated as a serious breach of this Policy and may result in disciplinary action up to and including termination of employment. Retaliatory conduct may also attract civil or criminal liability. NICU will connect an Eligible Whistleblower with internal and external support providers as necessary.

Review and availability of this Policy

This Policy may be amended from time to time. NICU's Chief Risk Officer and Company Secretary is primarily responsible for ongoing review and development of the Policy, with review occurring as necessary and at least annually. The Policy will be made available as amended from time to time.

Contact details

For general enquiries, contact Northern Inland Credit Union Limited on 1300 878 366, email info@nicu.com.au, or visit www.nicu.com.au.