
WHISTLEBLOWER POLICY

SECOS Group Limited (ACN 064 755 237) and subsidiaries ("Company "Or "SECOS")

1. INTRODUCTION

SECOS Group Limited and its controlled entities (**SECOS**), strives to create an environment that is reflective of its values, where people feel safe, included and respected. From time to time there may be issues that may not be reflective of our values. When that happens, we want you to know that you should feel safe to come forward and voice your concerns.

In the following sections, we outline our principles and what we do when we receive information about concerns. This whistleblower policy (**Group Policy**) will help you to understand how you can confidentially and safely report your concerns.

2. WHO CAN VOICE CONCERNS

This policy applies to anyone who has concerns or information relating to misconduct or improper circumstances or behaviours connected to SECOS may raise such issues under this Group Policy. This includes, just to name a few, current and former employees (i.e. directors, executives and all other personnel), contractors, suppliers, service providers, trainees, members of the community where we operate, and also their partners, dependants and relatives.

3. WHEN YOU SHOULD VOICE CONCERNS

If you become aware, or have reason to suspect, that misconduct or improper circumstances or behaviours connected to SECOS are contemplated, occurring, or may have occurred, you are strongly encouraged to raise your concerns in a timely manner. Some examples of misconduct are listed below:

- material breaches of our policies and procedures (including our Code of Conduct);
- illegal conduct, such as theft, dealing in, or use of illicit drugs, violence or threatened violence or criminal damage against property;
- fraud, money laundering, terrorist financing, tax evasion or misappropriation of funds;
- offering, giving or accepting a bribe;
- conflicts of interest;
- financial irregularities including false or questionable accounting, financial misstatements and misrepresentations;
- conduct causing danger to people, the environment or the financial system;
- sexual harassment, discrimination, bullying or harassment; and
- failure to comply with, or breach of, legal or regulatory requirements including disclosure obligations.

4. HOW TO VOICE CONCERNS

You can discuss your concerns with your manager, or the Company Secretary at +61 423 412 399 or via email at clai@secosgroup.com.au, or the external service platform at yan.flageul@mazars.com.au. Where your concern relates to misconduct or improper circumstances or behaviours connected to SECOS, they will in turn report the matter to the Chair of the Risk and Audit Committee (**RAC Chair**) or the Chair of the Board of Directors (**Board Chair**).

You can also safely and confidentially report concerns directly to the external service platform at yan.flageul@mazars.com.au.

5. WHAT INFORMATION SHOULD YOU PROVIDE?

When you voice your concerns, you should provide as much information about the issue as you can to help the RAC Chair (or Board Chair) to address them effectively. To that end, we encourage you to provide:

- the background, context, history and reason for the concern;
- the dates, places and, if possible, names of those involved; and
- any documents that may be relevant to the situation.

If you do not have all these details, do not let this hold you back from raising your concerns and providing additional details later.

We understand and respect that some people feel more comfortable not disclosing their identity, so you can report concerns anonymously and remain anonymous, if you wish.

6. WHAT HAPPENS AFTER YOU MAKE A REPORT?

You will receive an acknowledgement when your report has been received by the RAC Chair (or Board Chair), who will then review and assess the report and decide on next steps.

If appropriate, your report will be allocated for investigation. Investigations will be conducted respectfully, impartially and fairly. People who are mentioned in your report will also be treated fairly and concerns will be handled confidentially. SECOS may seek external assistance with relevant expertise and make disclosures of information to those external investigators on a confidential basis for the purposes of conducting the investigation.

If you have provided contact details or are contactable anonymously through the external service platform at yan.flageul@mazars.com.au, you will be updated if your case is allocated to investigation. You may be asked to confidentially participate in the investigation such as by continuing to provide information or additional details. We will endeavour to provide you with progress updates, as necessary, subject to legal, privacy and confidentiality considerations and you will be informed when the case is ready to close.

Investigation outcomes are confidential, and therefore you may not normally be told whether or not a particular concern has been substantiated. Your concerns will be taken seriously and addressed appropriately.

The outcome of the investigation may result in remedial or corrective action.

7. HOW WILL SECOS PROTECT YOU IF YOU RAISE CONCERNS?

7.1 CONFIDENTIALITY

The Audit and Risk Management Committee (**RAC**) will make every reasonable effort to ensure that your identity is protected and remains confidential. This may include steps such as removing identifying personal information in written material. Additionally, if your report is anonymous, we will seek to communicate with you through the external service platform at yan.flageul@mazars.com.au.

To protect your confidentiality, the RAC will ensure that those involved in handling and investigating your report understand their obligations in relation to confidentiality / anonymity.

If you voice your concerns on an anonymous basis to the RAC Chair (or the Board Chair), the RAC Chair (or the Board Chair) or their respective delegate may ask through the external service platform at yan.flageul@mazars.com.au if you are willing to consent to disclose your identity to those involved in an investigation. You do not have to provide consent if you do not want to, although in some instances this may impact our ability to investigate the matter effectively. The RAC Chair (or the Board Chair) or their respective delegate will discuss this with you so that you can make a decision with which you are comfortable.

Information that is likely to lead to your identification may be disclosed where it is necessary to investigate your report. The RAC and those investigating the matter will take all reasonable steps to prevent you from being identified.

Only where it is necessary, we may disclose your identity to a lawyer for the purpose of obtaining legal advice or representation or supporting an investigation, to law enforcement authorities, or to certain agencies such as corporate or tax regulators.

7.2 PROTECTION FROM DETRIMENT

SECOS strictly prohibits and does not tolerate detrimental conduct in response to an individual holding or raising a concern. Detrimental conduct occurs when a person causes or threatens to cause detriment to you or someone else because the person believes or suspects that you (or someone else) made, or could make a report under this Group Policy, and the belief or suspicion is the reason, or part of the reason, for the detrimental conduct or retaliation.

Detrimental conduct includes dismissal or a negative impact on your position, changes in duties or damage to reputation, harassment, intimidation or threats, discrimination, harm or injury (including psychological harm).

SECOS will also seek to protect you from detrimental conduct by providing you with details of available support services and engaging with Human Resources representatives if there are concerns about your health and wellbeing.

It is important you understand that reasonable actions taken in relation to the performance of your duties, including disciplinary and performance management processes, will not be considered detrimental conduct.

If you know or suspect that detrimental conduct has occurred or is occurring, you should report it in accordance with this Group Policy.

7.3 LEGAL PROTECTIONS

SECOS will respect and comply with any local laws that apply to you.

For further information about Australian laws in relation to speaking up, please read the Australian Whistleblower Procedure that is contained in Annexure A to this document.

8. WHEN DOES THIS POLICY NOT APPLY?

This Group Policy does not apply to deliberately false reports. You should never make a report about another person or event that you know or believe to be false. Doing so is against our values and may give rise to disciplinary action against you.

Further, this Group Policy does not apply to personal work-related grievances. A personal work-related grievance relates to your current or former employment and has implications for you. Personal work-related grievances include:

- interpersonal conflicts with another employee; and
- challenges to decisions around performance evaluations, promotions or disciplinary action.

You should raise personal work-related grievances with your manager or your relevant human resources contact.

If, however, you are uncomfortable speaking about the issue with both your manager and relevant human resources contact, or you have already shared a concern and feel it is not being addressed appropriately, you can raise your concern under this Group Policy.

9. COMMUNICATION AND COMPLIANCE

In order to promote transparency and accountability and to further the objectives of this policy the Company will:

- (a) post a copy of this policy on its website; and
- (b) disclose a summary of it in the Company's Corporate Governance Statement and Appendix 4G.

The Company Secretary is responsible for ensuring that the Company meets its compliance and reporting obligations referred to above.

10. RESPONSIBILITIES

The Board is ultimately accountable for this policy.

The Chief Executive Officer and the senior executives are responsible for implementing the policy and monitoring compliance, with the Company Secretary being responsible for the administration of the policy (including in relation to reporting to the Board, or its relevant Board committee).

11. ADOPTION AND REVIEW

This policy was adopted by the Board on 26 October 2023 and takes effect from that date and replaces any previous version of the policy.

The Board will review this policy periodically. The Chief Executive Officer will communicate any amendments to employees as appropriate.

Annexure A - Australian Whistleblower Procedure

A. Purpose of this procedure

This Australian Whistleblower Procedure (**Australian Policy**) is a whistleblower policy for the purpose of the Corporations Act 2001 (Cth).

This Australian Policy provides guidance on how you can safely, confidentially and without fear of retaliation voice concerns relating to SECOS, its business or its people, under Australian law.

This Australian Policy supplements SECOS's Group Policy by providing additional information required under Australian law and describing additional protections available under Australian law.

This Australian Policy is available on SECOS's website.

B. Who does this Australian procedure apply to?

SECOS's Group Policy is global and applies to everybody. In addition, this Australian Policy applies to you if you meet the following criteria to be an eligible whistleblower:

- you are an SECOS current or former employee, officer, associate, individual contractor or employee of a contractor, volunteer, work experience student, individual supplier or employee of a supplier, or a dependent or relative of any of the aforementioned; and
- there is a connection between your report and Australia, that is, you are:
 - (a) an Australian citizen;
 - (b) Australia based;
 - (c) speaking about a situation relating to the Australian SECOS operation; or
 - (d) speaking about conduct alleged to have occurred in Australia.

If you are unsure whether this Australian Policy applies to you, you may contact the Company Secretary to discuss.

C. When will you be protected under Australian law?

In order to obtain protection under Australian whistleblower laws you must meet all of the following criteria:

- you are an eligible whistleblower (as set out in section A above);
- you have a reasonable basis to suspect that misconduct or an improper state of affairs or circumstances has occurred in connection with SECOS (as set out in section D below); and
- you make your disclosure to an eligible recipient or another person authorised under the Australian whistleblower laws to receive disclosures (as set out in section E below).

Disclosures to a lawyer to obtain legal advice about protections under Australian law are also protected. In special circumstances, disclosures to a journalist or member of Parliament may also be protected and are explained further in section E below.

Provided that you reasonably believe or suspect your report to be true, you will still be protected under Australian law even if your report is not made in good faith, turns out to be incorrect, or is made anonymously. However, as stated in section 8 of the Group Policy, if you deliberately make a report that you believe to be false, you will not be protected and this may give rise to disciplinary action.

D. When should you voice your concerns?

You are strongly encouraged to promptly voice your concerns by using one of the reporting methods described in section E below.

To be protected under Australian law, your report must disclose reasonable grounds to suspect that misconduct or an improper state of affairs or circumstances connected to SECOS has occurred. Some examples are provided in section 3 of the Group Policy.

It is important you understand that personal work-related grievances are not protected under this Australian Policy. Please refer to the description of personal work-related grievances in section 8 of the Group Policy.

E. How do you voice your concerns?

To be protected under Australian law, you must make your report to one of the following authorised eligible recipients:

- a director (including the RAC Chair and Board Chair), Company Secretary or other officer of SECOS
- a senior leader of SECOS (Chief Executive Officer, Chief Financial Officer, General Manager or equivalent level)
- an external auditor (including a member of an audit team conducting the audit)

You can make a report to any of the eligible recipients listed above in person, by phone, by email or by letter. You should be aware that reports made to your manager may not be protected by Australian whistleblower laws unless your manager is an authorised eligible recipient as identified above.

Protections under Australian law are also available if you:

- make your disclosure to the Australian Securities and Investments Commission (**ASIC**), the Australian Prudential Regulatory Authority (**APRA**) or another prescribed body or, for tax related matters, to the Commissioner of Taxation; or
- make a public interest or emergency disclosure to a journalist or a parliamentarian. To make a public interest or emergency disclosure, the disclosure must have previously been made to ASIC, APRA or a prescribed body and written notice provided to the body to which the disclosure was made. In the case of a public interest disclosure, 90 days must have passed since the previous disclosure. It is important for you to understand the criteria for making a public interest or emergency disclosure and we recommend that you seek independent legal advice before you do so.

F. What happens after you make a report?

Refer to section 6 of the Group Policy for a description of what will happen next.

G. How will SECOS protect you if you voice your concerns?

Refer to section 7 of the Group Policy for a description of how SECOS will protect you.

If you voice your concerns under this Australian Policy, SECOS will provide you with the protections described below. If you make a report that you know or believe to be true, these protections will still apply even if your concern turns out to be incorrect.

(a) Confidentiality

Refer to section 7.1 of the Group Policy for the confidentiality measures SECOS will implement when you make a report.

Your identity will only be disclosed by SECOS with your consent. However, in some cases SECOS may disclose your identity without your consent to the following bodies:

- a lawyer for the purposes of obtaining legal advice or legal representation; or
- ASIC, APRA, the Australian Federal Police (**AFP**) or another prescribed body or, for tax related matters, the Commissioner of Taxation.

(b) Protection under detrimental conduct

SECOS strictly prohibits and does not tolerate detrimental conduct. Refer to section 7.2 of the Group Policy for the definition of detrimental conduct and how SECOS will protect you.

SECOS will also assess the risk of any detrimental conduct against you or others in relation to a report and will consider whether additional protection is needed.

Additional protections may be available to you under Australian law as described below.

H. How will you be protected under Australian law?

The legal (statutory) protections that apply if you qualify for protection under Australian law are set out below.

(a) Protection from detrimental conduct

Anyone who is proven to have engaged in detrimental conduct (as described under section G para (b) above) may be guilty of an offence and may be liable for damages.

In that case, you (or any other employee or person) can seek compensation and other remedies through the courts if you suffer loss, damage or injury because of detrimental conduct (as described under section G para (b) above) and if SECOS failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

(b) Your confidentiality will be protected

A person commits an offence if they obtain your identity or information likely to lead to your identification (**Confidential Information**) directly or indirectly because of your report and they disclose that information, unless:

- you consent to the disclosure of the Confidential Information
- a disclosure of information likely to lead to your identity is reasonably necessary for the effective investigation of the matter and all reasonable steps are taken to reduce the risk of your identification
- your Confidential Information is disclosed to ASIC, APRA, the AFP or a person or body prescribed by regulation or, for tax related matters, is reported to the Commissioner of Taxation
- your Confidential Information is disclosed to a lawyer for the purpose of obtaining legal advice or representation.

(c) You will be protected from some types of liability

For example:

- any legal action for breach of an employment contract, duty of confidentiality or another contractual obligation for making the disclosure
- attempted prosecution for unlawfully releasing information, or other use of the disclosure in a prosecution
- disciplinary action for making the disclosure.

These legal protections do not grant you immunity from liability if you are found to have participated in any misconduct that you report.

SECOS also encourages you to seek independent legal advice.

I. More information

For questions or more information about this Australian Policy please contact the Company Secretary at clai@secosgroup.com.au.