

Avant Group *Whistleblower Policy 2023*

Effective: 8 August 2023

Approved by: Joint Group and DHF Risk Committee

1. Application

Avant is committed to the highest levels of ethics and integrity in the way it does business. Avant understands this is crucial to its continued success in supporting its members and the community and encourages its people to raise legitimate issues and recognises together, Avant and its people, have a shared responsibility to report unethical behaviour.

This Whistleblower Policy (Policy) applies to Avant Mutual Group Limited ABN 58 123 154 898, and each of its related entities (Avant). This Policy does not apply to Avant's customers.

2. Purpose

This Policy forms part of the Avant Group Risk Management Framework and its purpose is to:

- a) increase transparency of Avant's framework for receiving, handling and investigating disclosures that qualify for whistleblower protections under the law, including providing information about the protections available and how individuals qualify for protections under this Policy;
- b) promote a culture of honesty, ethical behaviour and corporate compliance;
- c) encourage the reporting of any instances of suspected wrongdoing; and
- d) ensure that disclosures are dealt with appropriately and on a timely basis.

Avant is committed to ensuring that Avant's officers, employees and associates who report possible wrongdoing are supported, are treated fairly and can make disclosures without fear or threat of victimisation or detriment.

3. Policy Statement

Avant encourages individuals to disclose actual or suspected wrongdoing in accordance with this Policy if they believe that an Avant officer, employee, contractor or other person who has business dealings with Avant has engaged in misconduct.

Avant will ensure disclosures made under this policy are safeguarded, assessed, investigated and reported by Avant in accordance with the requirements of this Policy.

4. Qualifying for Whistleblower Protection

A disclosure will qualify for protection under the Corporations Act 2001 (Cth) (Corporations Act) or *Taxation Administration Act 1953* (Cth) (Tax Act) if it is a disclosure by an 'Eligible Whistleblower' to:

- a) an Eligible Recipient;
- b) the Australian Securities and Investments Commission (ASIC), the Commissioner of Taxation (in relation to tax matters), the Australian Prudential Regulation Authority (APRA) or a prescribed Commonwealth Authority or legal practitioner; or
- c) the discloser has reasonable grounds to suspect that the disclosed information concerns a disclosable matter.

4.2 Who is an Eligible Whistleblower?

The following are capable of being 'Eligible Whistleblowers':

- a) an officer or employee of Avant, which for the purposes of this Policy includes Directors, Alternate Directors, Representatives and Company Secretaries;
- b) members of Avant committees, including advisory committees;
- c) individuals who provide paid or unpaid services or goods to Avant (or an employee of that individual);
- d) a contractor, consultant, services provider or business partner of Avant (and their employees); or
- e) a relative or dependent of an individual listed above (including, but not limited to, a spouse, parent, child, grandchild, or sibling).

An Eligible Whistleblower also includes an individual who has previously held any of the above positions or functions or is a relative, dependent or spouse of the above individuals. The Corporations Act or Tax Act may also prescribe other types of Eligible Whistleblowers.

4.3 What matters are disclosable?

A disclosable matter is information that:

- a) concerns conduct that is dishonest, fraudulent, corrupt, illegal, unethical or a breach of internal policy (including Avant's Code of Conduct);
- b) concerns misconduct or an improper state of affairs in relation to Avant or its related bodies corporate, including information relating to Avant's tax affairs;
- c) indicates an Avant related body corporate or one of its directors, officers or employees has engaged in conduct that is an offence against, or contravention of, the Corporations Act or *Australian Securities and Investments Commission Act 2001* (Cth) and any instrument made under these acts;
- d) constitutes an offence against or a contravention of any other law of the Commonwealth that is punishable by imprisonment for 12 months or more; or
- e) is a danger, or represents a danger to, the public or financial system.

Disclosable matters are not necessarily limited to a contravention of law - Schedule 2 provides guidance on what constitutes a Disclosable Matter.

An Eligible Whistleblower who makes a disclosure must have reasonable grounds to suspect the information to qualify for protection. This means that even if a disclosure turns out to be incorrect, the protections may still apply.

Disclosures that are not about disclosable matters not covered by this Policy are not protected. However, a disclosure may be protected under other legislation, such as the Fair Work Act 2009 (Cth).

4.4 Work related grievances

A disclosure of a work-related grievance may be protected in limited circumstances and if that that conduct relates to systemic issues, involves detrimental conduct to a Whistleblower or if a disclosure of a work related grievance is made to a legal practitioner to obtain legal advice or representation in relation to the whistleblower provisions. Schedule 2 contains examples of work-related grievances as well as instances when a work-related grievance may still qualify for protection.

4.5 Who can receive a disclosure?

4.5.1 Disclosures within Avant

For the protections under this Policy to apply, a disclosure must be made directly to an Eligible Recipient. Schedule 1 of this Policy sets out the individuals (referred to as Authorised Eligible Recipients) who can receive disclosures. Whilst Avant encourages disclosures to Avant's Authorised Eligible Recipients, if it relates to those individuals, or if you do not feel comfortable raising your disclosure with an Authorised Eligible Recipient you could also raise it with any of the following:

- a) an officer or senior manager of Avant or a related body corporate; or
- b) an internal or external auditor or actuary of Avant or a related body corporate (including a member of an audit team conducting an audit); or
- c) an employee or officer that has functions or duties relating to Avant's tax affairs or a registered tax agent or Business Activity Statement agent who provides services to Avant (this is only relevant to the Tax Act whistleblower regime); or
- d) a lawyer, for the purposes of taking advice about whistleblower protections.

4.5.2 Disclosure to External Regulatory Bodies

While it is Avant's preference for disclosures to be made internally, to give Avant the opportunity to investigate and deal with them, an Eligible Whistleblower may choose to raise disclosable matters with:

- a) ASIC;
- b) APRA;
- c) the Commissioner of Taxation; or
- d) a Commonwealth authority prescribed in the Corporations Regulations.

Instructions on how to make a disclosure to ASIC, APRA or the Commissioner of Taxation are included in Schedule 4.

4.5.3 Disclosure to a Legal practitioner

A disclosable matter will also be protected if it is to a qualified legal practitioner for the purposes of taking legal advice or legal representation in relation to the operation of the whistleblower provisions under the Corporations Act.

4.5.4 Emergency and Public Interest Disclosures

There are two other categories of disclosures – Emergency Disclosures and Public Interest Disclosures. These categories require Eligible Whistleblowers to comply with strict requirements set out below.

Emergency Disclosures

An Emergency Disclosure is a disclosure made to a journalist or member of Parliament (Commonwealth, State or Territory) where:

- a) a discloser must have first made a qualifying disclosure to ASIC, APRA or another prescribed Commonwealth authority;
- b) the discloser has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health and safety of one or more persons or to the natural environment;
- c) the Eligible Whistleblower gave notice, in writing, to the body to which the qualifying disclosure was made that:
 - includes sufficient information to identify the previous disclosure; and
 - 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 necessary to inform the journalist or member of Parliament of the substantial and imminent danger.

Public Interest Disclosures

A Public Interest Disclosure is a disclosure of information to a journalist or members of Parliament (Commonwealth, State or Territory) where:

- a) the Eligible Whistleblower must have first made a qualifying disclosure to ASIC, APRA or another prescribed Commonwealth Authority;
- b) at least 90 days has passed since the qualifying disclosure was made;
- c) the Eligible Whistleblower does not have reasonable grounds to believe that action is being, or has been, taken to address the matters raised in the qualifying disclosure;
- d) the discloser has reasonable grounds to believe that making a further disclosure of the information is in the public interest; and
- e) after 90 days has passed, the Eligible Whistleblower must give notice, in writing, to the body to which the qualifying disclosure was originally made that:
 - includes sufficient information to identify the previous disclosure; and
 - states that the Eligible Whistleblower intends to make a public interest disclosure; and
- f) the extent of the information disclosed in the Public Interest Disclosure is no greater than necessary to inform the journalist or member of Parliament of the misconduct or improper state of affairs or circumstances, or other conduct failing within the scope of this Policy.

Avant encourages employees to make use of the whistleblowing procedures set out in this Policy. However, Avant acknowledges that in some circumstances, it will be necessary for individuals to make further disclosures, and Avant will comply with all legislative requirements in respect of such disclosures.

Avant encourages Eligible Whistleblowers to seek independent legal advice before making an Emergency Disclosure or Public Interest Disclosure so that you importantly understand the criteria for making these types of disclosures.

5. How can I make a Disclosure ?

5.1 Whistleblower Investigation Officer

Avant encourages Eligible Whistleblowers to report actual or suspected wrongdoing to the Whistleblower Investigation Officer contained in Schedule 1. This person is the central organising point for any whistleblowing reports.

If information relating to instances of reportable conduct is instead submitted to another eligible recipient within Avant (i.e. a director of Avant), that information will be passed immediately onto the Whistleblower Investigation Officer for assessment.

Should the disclosure relate to the Whistleblower Investigation Officer, that person will not be involved in conducting or receiving reports in relation to the investigation. Instead, the disclosure will be directed to one of the Alternative Whistleblower Investigation Officers listed in Schedule 1 of this Policy.

5.2 Stopline

If you are uncomfortable raising the disclosure internally or if you are dissatisfied with the results of an investigation, Avant recommends using our external whistleblower agency, Stopline, to make your whistleblower disclosure. Stopline's confidential service allows you to report wrongdoing, misconduct or an improper state of affairs. Disclosure to Stopline can either be online, by email or by telephone. Reports can either be made anonymously or by disclosing your identity. Stopline can be accessed 24/7 and their details are:

Email: makeareport@stopline.com.au

Microsite: avant.stoplinereport.com

Telephone: 1300 30 45 50

Webform: <https://sldisclosures.typeform.com/to/FZ7ywcqt>

You are also able to make a disclosure to Stopline if you have a work related grievance and these will be assessed for whether they are eligible for whistleblower protection in the first instance. If the disclosure is eligible for protection the disclosure will be referred to the Whistle-blower Investigation Officer in the first instance. If the work related grievance is ineligible for protection, it will be referred to the Chief People Officer.

5.3 Disclosure to an External Party

Where a disclosure is being made under section 4.5 or 5.2 of this policy, information can be disclosed in several ways, including by a written letter or email, telephone call or meeting in person. Before making a disclosure Avant encourages you to seek independent legal advice to understand the criteria for making a disclosure. If you make the disclosure to an external party you should specify the disclosure is being made under this Policy.

5.4 What do I include in a Disclosure?

Disclosers who qualify for protection under this Policy should provide as much detailed information as possible so that their report can be investigated. Useful details include:

- a) date, time and location;
- b) names of person(s) involved, roles and their team(s);
- c) your relationship with the person(s) involved;
- d) the general nature of your concern;
- e) how you became aware of the issue;
- f) possible witnesses; and
- g) other information that you have to support your report.

5.5 How can I make an anonymous disclosure?

You can choose to make a disclosure anonymously. If you have concerns about your identity becoming known you may prefer to adopt a pseudonym for the purposes of the disclosure or submit the disclosure to Authorised Eligible Recipient through an anonymous email address. Regardless, anonymous disclosures are still capable of being protected under the Corporations Act or Tax Act (as applicable) if all other criteria are met.

Although it can be more difficult for Avant to investigate an anonymous disclosure, it may be possible to address this if the Eligible Whistleblower provides a means of anonymised contact for any follow up questions.

If an Eligible Whistleblower wishes to remain anonymous, Avant will take all reasonable steps to protect their confidentiality including, but not limited to, the following:

- a) the Eligible Whistleblower will be referred to in a gender-neutral context;
- b) where possible, the Eligible Whistleblower will be contacted to help identify certain aspects of the disclosure that could inadvertently identify them;
- c) all paper and electronic documents and other materials relating to disclosures under this Policy will be stored securely; and
- d) access to all information relating to a disclosure under this Policy will be limited to those directly involved in managing and investigating the disclosure.

6. Investigating Disclosures

Where a Protected Disclosure is made internally, Avant will consider the disclosure and if appropriate, conduct an objective investigation as is reasonable and appropriate having regard to the nature and circumstances of the reportable conduct.

Avant will treat the person making the Protected Disclosure fairly and any findings will be made on reliable evidence. The investigation will be conducted independently of the person or persons referred to in the disclosure.

While the particulars of each investigation will vary depending on the nature of the disclosure, a synopsis of the overall investigation process is outlined in Schedule 3.

7. Protections Available to Whistleblowers

Important protections relating to confidentiality and detriment apply to Eligible Whistleblowers who report disclosable matters. These protections apply not only to internal disclosures, but to legal practitioners, regulatory and other external bodies, and public interest and emergency disclosures that are made in accordance with the Corporations Act. Avant takes contraventions and these protections seriously and may take disciplinary action against anyone doing so. If you have any concerns you can raise them with the Authorised Eligible Recipient. Civil and criminal sanctions also apply for breaches of these protections.

7.1 Protecting the Identity of Whistleblowers

Strict confidentiality obligations apply to any disclosures that qualify for protection. Unless the Eligible Whistleblower consents, it is illegal for anyone to disclose the identity of an Eligible Whistleblower or disclose information that is likely to lead to their identification.

Avant is committed to ensuring the confidentiality of Eligible Whistleblowers. There may be some circumstances when Avant may ask Eligible Whistleblowers to consent to disclosing their identity, or information that may lead to their identification. Avant will only ask for this consent if it is needed to appropriately investigate and resolve the matter and/or prevent the disclosable matter from occurring again.

If the Eligible Whistleblower does not consent to their identity being disclosed, it will still be lawful to disclose their identity to:

- a) ASIC, APRA, Australian Federal Police or the Commissioner of Taxation (in the case of tax matters);
- b) a legal practitioner for the purposes of obtaining legal advice or representation about the disclosure;
- c) a body prescribed by the Corporations Regulations;
- d) a court where it is necessary to give effect to the Tax Act or Corporations Act or in the interests of justice to do so.

The information contained in a disclosure can be disclosed with or without the discloser's consent only if the information does not include the discloser's identity, the recipient has taken all reasonable steps to reduce the risk that the discloser will be identified from the information, and it is reasonably necessary for investigating the issues raised in the disclosure.

If there is a breach of confidentiality, an Eligible Whistleblower can lodge a complaint with an Authorised Eligible Recipient or a regulator such as ASIC or APRA for investigation.

If your disclosure qualifies for the protections set out in this Policy, it is likely you will be asked to consent to providing your identity or information as this likely to identify you. This would only be to facilitate the investigation and/or resolution of the matter. If you choose to withhold your consent it may not be possible to adequately investigate and respond to the disclosure either in part or in full.

7.2 Protecting Eligible Whistleblowers from Legal Action

Individuals who qualify for whistleblower protection are protected from:

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

However, whistleblowers will not receive protection for their own misconduct or wrongdoing.

7.3 Protecting Whistleblowers Against Victimisation and Detriment

The protections also make it unlawful for a person to engage in conduct against another person that causes or will cause a detriment. The meaning of detriment is wide and might include:

- dismissing or demoting an employee;
- harming or injuring an employee in their employment;
- altering an employee's position or duties to their disadvantage;
- discriminating between an employee and other employees;
- a transfer to another office or location;
- harassing, bullying or intimidating a person;
- harming or injuring a person; and
- damage to a person's reputation, property or financial position.

Detrimental conduct is unlikely to include, for example, administrative action that is taken to protect an Eligible Whistleblower who has made a Protected Disclosure from detriment (such as enabling them to work from home or changing an Eligible Whistleblower's reporting line if the disclosure relates to their manager). A disclosure will also not prohibit Avant from managing, in the usual way, any separate performance issues that may affect the work of the Eligible Whistleblower.

Avant will not tolerate the ill treatment, including victimisation or bullying, of any Avant employee mentioned in, or related to, a Protected Disclosure. Any such ill treatment may result in disciplinary action being taken, up to and including termination of employment without notice or payment in lieu of notice.

There are also separate and serious consequences at law for victimising or causing detriment to a person because that person has made, could make, proposes to make, or is perceived to have made a Protected Disclosure.

Any staff member subjected to detrimental conduct (or a threat to cause any detriment) as a result of making a Protected Disclosure should inform Avant immediately. Avant will thoroughly investigate reports of any victimisation or detrimental conduct related in any way to a Protected Disclosure being made.

A whistleblower may be subject to disciplinary action, if, during investigating a disclosure, Avant determines the Eligible Whistleblower was complicit in the misconduct or improper state of affairs or has otherwise acted in an improper way.

If a whistleblower believes they have suffered a detriment they can lodge a complaint with an Authorised Eligible Recipient, seek independent legal advice or lodge a complaint with a regulator such as ASIC, APRA or the ATO.

7.4 Compensation And Other Remedies

Courts have broad powers to remedy a detriment or threatened detriment. These include injunctions, compensation orders (including against individual employees and their employer), reinstatement, damages and the making of apologies. Civil and criminal sanctions also apply to breaches of the Corporations Act or Tax Act if an entity fails to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

Eligible Whistleblowers seeking remedies through the courts are encouraged to seek independent legal advice.

8. Other Support for Whistleblowers

Avant will take appropriate measures to support the wellbeing and protect Eligible Whistleblowers from detriment. While the matter is being investigated, in addition to those matters already discussed in this Policy, this support may include:

- a) assigning a Whistleblower Protection Officer who will be the point of contact for the disclosing person while a matter is being investigated. The Whistleblower Protection Officer will be available to the Eligible Whistleblower to discuss any concerns that they may have and to help arrange additional support where needed;
- b) monitoring and managing the behaviour of other employees; and
- c) considering whether the Eligible Whistleblower can or should be:
 - allocated alternative duties or an alternative role at the same level;
 - permitted paid time off work; or
 - offered flexible working arrangements.

Current employees can also access Avant's employee assistance program.

9. Treatment and Support for Employees Referred to in Protected Disclosures

Avant will ensure fair treatment of its employees who are mentioned in a Protected Disclosure, including those who are the subject of a disclosure, by:

- a) ensuring any investigations are free from bias, appropriately resourced and made in a timely fashion; and
- b) allowing people who are named in Protected Disclosures an opportunity to respond to allegations against them at an appropriate time during any investigation.

10. Policy Availability

This Policy will be made available to Avant’s officers and employees by:

- a) being distributed to all existing staff members at the date the Policy is approved by Avant; and
- b) being included in the induction information packs that are provided to all new staff members during their induction.

A copy of the Policy will also be available to all officers and employees of Avant through the ‘hub’ or by requesting a copy from People & Culture or through Avant’s website.

11. Receiving Additional Information

If you have any questions about how this Policy operates and the circumstances in which protections will apply, please contact the General Counsel (whose contact details are set out at Schedule 1). The General Counsel can provide you with additional information regarding the process for making a disclosure and the protections available to Eligible Whistleblowers that make a Protected Disclosure prior to you making a formal disclosure.

12. Governance

This Policy will be reviewed and, if required, updated every three years (or more frequently, if for example, a change in law means an interim update is needed).

Owner	General Counsel	Published on	8 August 2023
		Next review date	August 2025
Approver	Group Risk Committee	Approved	8 August 2023

Schedule 1 – Authorised Eligible Recipients

Name	Position	Contact Details
Stopline Pty Ltd	Independent third party -whistleblower service	Email: makeareport@stopline.com.au Microsite: https://avant.stoplينerreport.com/ Telephone: 1300 30 45 50 Webform: https://sldisclosures.typeform.com/to/FZ7ywcqt
Chief People Officer	Whistleblower Protection Officer	whistleblowing@ avant.org.au
General Counsel	Whistleblower Investigation Officer	
Chief Risk Officer	Whistleblower Investigation Officer	
Head of Internal Audit	Alternative Whistleblower Investigation Officer	

Schedule 2 – Disclosable Matters

1. Disclosable Matters under the Corporations Act

1.1 Disclosable Matters under the Corporations Act can include information that the discloser has reasonable grounds to suspect concerns misconduct, or an improper state of affairs or circumstances in relation to Avant.

- a) The term 'misconduct' is defined in the Corporations Act to include 'fraud, negligence, default, breach of trust and breach of duty'. The phrase 'improper state of affairs or circumstances' is not defined and is intentionally broad. For example, 'misconduct or an improper state of affairs or circumstances' may not involve unlawful conduct in relation to Avant but may indicate a systemic issue that the relevant regulator should know about to properly perform its functions. It may also relate to business behaviour and practices that may cause consumer harm.
- b) The term 'reasonable grounds to suspect' is based on the objective reasonableness of the reasons for the discloser's suspicion. It ensures that a discloser's motive for making a disclosure, or their personal opinion of the person(s) involved, does not prevent them from qualifying for protection. In practice, a mere allegation with no supporting information is not likely to be considered as having 'reasonable grounds to suspect'. However, a discloser does not need to prove their allegations.

1.2 Disclosable Matters can also include information about Avant, if the discloser has reasonable grounds to suspect that the information indicates Avant (including its 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* (Cth);
 - iii. the *Banking Act 1959* (Cth);
 - iv. the *Financial Sector (Collection of Data) Act 2001* (Cth);
 - v. the *Insurance Act 1973* (Cth);
 - vi. the *Life Insurance Act 1995* (Cth);
 - vii. the *National Consumer Credit Protection Act 2009* (Cth);
 - viii. the *Superannuation Industry (Supervision) Act 1993*; or
 - ix. an instrument made under an Act referred to above;
- 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.

1.3 Disclosable Matters can include conduct that may not involve a contravention of a particular law. For example, information that indicates a significant risk to public safety or the stability of, or confidence in, the financial system is also a disclosable matter, even if it does not involve a breach of law.

1.4 Examples of conduct that may constitute a Disclosable Matter includes conduct that is:

- a) dishonest, fraudulent (e.g. fraud committed by an Avant employee in relation to sums paid out under an insurance policy) or corrupt;
- b) illegal (e.g. theft, dealing in or use of illicit drugs, violence or threatened violence, harassment or intimidation, criminal damage to property or other breaches of the law);
- c) potentially damaging to Avant, an Avant employee or a third party (e.g. unsafe work practices);
- d) a misappropriation of funds;
- e) damaging to Avant's reputation with or without a resulting financial loss;
- f) unethical or in breach of Avant's policies;
- g) a danger to the public or to Australia's financial system; or
- h) otherwise involving any other kind of serious impropriety.

2. Disclosable Matters Under the Tax Act

Under the Tax Act, disclosures will qualify for protection if they are made by an Eligible Whistleblower and either:

- a) the disclosure is made to the Commissioner of Taxation, because the whistleblower considers that the information may assist the Commissioner to perform their functions or duties under taxation law in relation to Avant or an associate of Avant; or
- b) the disclosure is made to an Eligible Recipient and the whistleblower has reasonable grounds to suspect that the information indicates misconduct, or an improper state of affairs or circumstance in relation to the tax affairs of Avant or an associate of Avant, and considers that the information may assist the recipient to perform functions or duties that relate to the tax affairs of Avant.

The term "tax affairs" is defined in the Tax Act as affairs relating to all taxes imposed by or under, or assessed or collected under, all laws administered by the Tax Commissioner.

3. What Are Personal Work-Related Grievances?

3.1 Disclosures relating to personal work-related may qualify for protection under the Corporations Act in limited circumstances, including where the matter identified relates to systemic issues, involves detrimental conduct to a whistleblower or is made to legal practitioner to obtain legal advice or representation in relation to the whistleblower provisions.

3.2 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;
- 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.

3.3 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;
- b) Avant 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 a disclosure; or
- d) the discloser seeks legal advice or legal representation about the operation of the whistleblower protections under the Corporations Act.

3.4 If the disclosure does relate to a personal work-related grievance, please reach out to your supervisor or to People & Culture for a confidential discussion about the matter.

Schedule 3 – Investigation Process for a Protected Disclosure

Where a Protected Disclosure is made internally and Avant considers it necessary to conduct an objective investigation, the investigation will generally be conducted as follows:

1. Avant may ask for further information, depending on the nature of the disclosure and detail provided;
2. Avant may also request the disclosing person's consent to disclose their identity to the Whistleblower Investigation Officer and those involved in investigating the disclosure. The discloser can choose to remain anonymous, in which case Avant will not be able to disclose the identity of the discloser or any information that is likely to lead to the identification of that person, unless:
 - a) the information does not include the discloser's identity;
 - b) the entity removes information relating to the discloser's identity or other information that is likely to lead to the identification of the discloser (eg the discloser's name, position title and other identifying details); and
 - c) it is reasonably necessary for investigating the issues raised in the disclosure;
3. Avant may not be able to undertake an investigation if it is not able to contact the disclosing person for further information. It should also be noted that a discloser's identity may be able to be guessed if, for example:
 - a) the discloser has previously mentioned to other people that they are considering making a disclosure;
 - b) the discloser is one of a very small number of people with access to the information; or
 - c) the disclosure relates to information that a discloser has previously been told privately and in confidence;
4. if the disclosure has not been made directly to the Whistleblower Investigation Officer, the recipient will immediately refer the matter to the Whistleblower Investigation Officer for a preliminary assessment;
5. the Whistleblower Investigation Officer will undertake a preliminary review of the allegations raised in the disclosure as soon as reasonably possible after receipt of the disclosure. This may include collecting further material in order to consider the allegations;
6. at the conclusion of the Whistleblower Investigation Officer's preliminary review, they will decide whether an in-depth investigation is required. If so, the Whistleblower Investigation Officer will determine:
 - a) the nature and scope of the investigation;
 - b) the person(s) within and/or outside Avant that should lead the investigation (the Lead Investigator) – this person must also be an Eligible Recipient;
 - c) the nature of any technical, financial or legal advice that may be required to support the investigation; and
 - d) the anticipated timeframe for the investigation;
7. at this stage, unless the disclosing person has elected to remain anonymous and/or it is not appropriate to do so, the Whistleblower Investigation Officer will advise that individual of the decision to investigate further and will assign the disclosing person a Whistleblower Protection Officer (who must also be an Eligible Recipient) if the disclosing person consents to such and it is appropriate to do so;
8. subject to confidentiality requirements, the Whistleblower Investigation Officer will maintain a register with details of any disclosure that has been made under this Policy (the **Whistleblower Register**). If an in-depth investigation is carried out, the Whistleblower Register will also record details of the progress of any investigation;
9. Should a Protected Disclosure relate to allegations about the Whistleblower Investigation Officer, the Alternative Whistleblower Investigation Officer will carry out the steps referred to in this schedule;
10. All investigations will be conducted in a timely manner and in any event will be completed within a reasonable timeframe of the disclosure being made. The Whistleblower Investigation Officer will monitor the length of investigations and seek regular updates from the Lead Investigator as to the progress and results of the investigation;
11. Throughout the investigation, where appropriate, Avant will provide feedback to the whistleblower regarding the investigation's progress and/or outcome (subject to considerations relating to the privacy against those whom allegations are made, and being conscious of not prejudicing any external investigations or other matters arising from a disclosure being made); and
12. Avant will periodically update its executives and board members on this Policy and any reports made under it. When making these reports it will ensure that it does not breach its obligations of confidentiality. The method for documenting and reporting the findings of an investigation will depend on the nature of the disclosure.

Schedule 4 – External Reporting

1. How do I make a disclosure to ASIC (Corporations Act)?

Whistleblowers can make a report to ASIC's Office of the Whistleblower by lodging a report via ASIC's online reporting form at: <https://asic.gov.au/about-asic/contact-us/how-to-complain/report-misconduct-to-asic/>.

2. How do I make disclosure to the Commissioner for Taxation? (Tax Act)

A Protected Disclosure can be made to the Commission of Taxation in the following ways:

- a) through the tip-off form in the contact section of the ATO app, downloadable from: <https://www.ato.gov.au/general/gen/making-a-tip-off/>;
- b) by telephone on the confidential hotline to report tax avoidance schemes: 1800 060 062;
- c) by mail (marking your letter "in confidence") to:

Australian Taxation Office
Tax Integrity Centre
Locked Bag 6050
Dandenong VIC 3175

3. How do I make a disclosure to APRA?

Whistleblowers can make a report to the Australian Prudential Regulation Authority by emailing: whistleblower@apra.gov.au