

Honey Insurance's Whistleblower Policy enables you to actively play a role in making sure we live up to our collective objectives and remove any inappropriate conduct, behaviour or decisions in the workplace.

This policy allows any Honey Insurance employee to raise concerns they have, so that we:

- allow you to disclose concerns safely, securely and with confidence that they will be protected and respected as sensitive, where appropriate,
- deal with any issues raised in a timely manner,
- provide transparency around Honey Insurance's framework for receiving, handling and investigating these issues,
- prevent improper conduct, behaviour and decisions,
- apply an appropriate approach to assist Honey Insurance identify wrongdoing that otherwise may not be identified, and
- implement a framework for whistleblower disclosures which meets the requirements of the *Corporations Act* and *Taxation Administration Act*.

This Policy is approved by the Board of Honey Insurance Pty Ltd (**tentative - Board review 4th June 2021**).

Availability

This Policy is made available through internal Honey Insurance communications and employee training. It will be provided separately to Eligible Recipients who are not Honey Insurance employees. A version of the Policy will also be made available to others entitled to raise relevant issues under this Policy through Honey Insurance's website.

Questions

Any questions you have about how this Policy operates should be directed to the Disclosure Officer who may be contacted in person, by telephone, email or mail.

What conduct is reportable?

You report an incident, with the benefit of the protections set out in this Policy and under the *Corporations Act*. If you have reasonable grounds to suspect the information concerns misconduct, or an improper set of circumstances, including whereby Honey Insurance or any of their employees have engaged in conduct which is:

- dishonest or misleading;
- fraudulent or corrupt;
- illegal, such as theft, drug use or selling of drugs ;
- violent;
- bullying, discrimination, victimisation or harassment;
- criminal, eg. - damage to property or other breaches of common law
- a failure to comply with, or a breach of, legal or regulatory requirements, including but not limited to the *Corporations Act* and *ASIC Act*;
- misconduct, or an improper state of affairs or circumstances in relation to Honey Insurance's tax affairs;
- in the case of Honey Insurance Pty Ltd, a responsible person does not meet the fit and proper criteria set out in the Honey Insurance Group Fit and Proper Policy;

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- a systemic issue that a regulator should know about;
- potentially harmful to Honey Insurance Employees, such as unsafe work practices or environment; or
- a danger to the public or the financial system.

As well as the *Corporations Act* protections, further protection is provided to individuals drawing attention to reportable conduct under the *Taxation Administration Act 1953*. Further information about these laws can be found at:

<https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/https://www.ato.gov.au/general/gen/whistleblowers/>

Other matters

The protections in this Policy and under the *Corporations Act* do not apply to disclosures relating to other topics, where the information does not concern misconduct or an improper set of circumstances.

You can make a report if you are, or have been, any of the following:

- a director or officer of Honey Insurance;
- an employee of Honey Insurance;
- a supplier of services or goods to Honey Insurance (whether paid or unpaid);
- an employee of a supplier of services or goods to Honey Insurance (whether paid or unpaid);
- an associate of Honey Insurance;
- a relative of any of the above individuals; or
- a spouse or dependent of any of the above individuals.

Honey Insurance has several ways to report an incident.

STOPline

We have engaged an external specialist organisation (STOPline) to confidentially accept any issues raised under this Policy. This is to allow people who raise concerns to feel comfortable and reassured that the issues will be dealt with confidentially, professionally and in good faith. These concerns can be reported via telephone, mail, email, or the website. It is important to remember our program enables individuals to maintain anonymity should they choose. STOPline is available to all Honey Insurance Employees and designated stakeholders referred to in this document.

Translation services can be provided if requested. Disclosures can be made to STOPline under this Policy in any of the following ways:

Phone: **1300 30 45 50** – AUSTRALIA

+61 3 9811 3275 – OVERSEAS (REVERSE CHARGES)

Email: SEND AN EMAIL TO: makeareport@stopline.com.au

Website: <http://honeyinsurance.stoplinereport.com/>

Post: C/O THE STOPLINE LOCKED BAG 8 HAWTHORN VIC AUSTRALIA 3122

App: Search for STOPline in the iTunes App Store or Google Play to download the free app and submit a relevant issue

Disclosure to others

While Honey Insurance encourages you to use STOPline to raise relevant issues under this Policy, you are also entitled to make your concern known to:

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- another 'Eligible Recipient' in relation to Honey Insurance, which means:
- a director or officer;
- a senior manager;
- ASIC; or
- APRA.

When you communicate directly to STOPline or one of the above Eligible Recipients you qualify for protection as a whistleblower under the *Corporations Act* from the time you raise your concern.

Where, rather than using the STOPline, you make a disclosure to one of the other Honey Insurance Eligible Recipients above, it is important that you first make it clear you want to raise a concern under this Policy, so that the Eligible Recipient understands that the terms of the Whistleblower Policy need to be met.

Where an Honey Insurance Eligible Recipient receives a disclosure, they should immediately notify the Disclosure Officer and follow their guidance.

Public Interest Disclosures

Where you have raised an eligible concern with ASIC or APRA (but not otherwise), you are also permitted to disclose information to a journalist or parliamentarian in the following circumstances:

- at least 90 days have passed since you made the disclosure to ASIC or APRA;
- you do not have reasonable grounds to believe that action is being, or has been taken, in relation to the concerns raised;
- you have reasonable grounds to believe that raising your concern is in the public interest; and
- before making the public interest disclosure, you have given written notice to ASIC or APRA (as appropriate) that identifies the disclosure and states that you intend to make a public interest disclosure.

Emergency Disclosures

Where you have raised an eligible concern with ASIC or APRA (but not otherwise), you are also entitled to disclose information to a journalist or parliamentarian in the following circumstances:

- you have reasonable grounds to believe that information subject to the disclosure concerns a substantial and imminent danger to the health or safety of one or more persons ;
- before making the emergency disclosure, you have given written notice to ASIC or APRA (as appropriate) that identifies the disclosure and states that you intend to make an emergency disclosure; and
- to the extent the information disclosed in the emergency disclosure is no greater than is necessary to inform the journalist or parliamentarian of the substantial and imminent danger.

Legal Advice

The protections in this Policy also apply to any disclosure made by you, as an eligible individual who raises a concern, to a legal practitioner for the purpose of obtaining legal advice or legal representation regarding the operation of the whistleblower provisions in the *Corporations Act* and this Policy (even if the legal practitioner concludes that a disclosure is not a Reportable Conduct).

What is the Investigation Process after a Report is made?

Any report made to our external provider, STOPline, will be detailed in a Disclosure Report to Honey Insurance's Disclosure Officer, unless information in the report relates to the Disclosure Officer, in

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which case STOPline will instead provide its report to Honey Insurance's CEO without the involvement of any other parties.

If the Disclosure Officer considers they may have an actual or potential conflict in relation to a disclosed matter, they should immediately pass all information relating to the disclosure to the Honey Insurance CEO and remove themselves from further involvement.

After the initial report is provided, Honey Insurance's Disclosure Officer (or Honey Insurance CEO) will assess the disclosed matter to determine whether it qualifies for protection under this Policy and whether an investigation is warranted.

Where this is the case, Honey Insurance's Disclosure Officer will provide the nature, scope and timeframe of the investigation, which will vary depending on the nature of the disclosure, and appoint a WIO with appropriate expertise and skills that are operationally independent from the area concerned.

Honey Insurance's Disclosure Officer will provide information regarding the disclosure to the WIO where that is considered necessary for investigating the issues raised in the disclosure. Your identity will only be disclosed if you have given your consent to do so.

During this process, STOPline and the Disclosure Officer to keep them informed of the investigation's progress and advise them of the final outcome.

The person raising a concern is entitled to remain anonymous or use a pseudonym during the course of the investigation and is entitled to refuse to answer any questions that are asked, though this may impact the effectiveness of the investigation.

The final outcome will be communicated to Honey Insurance's CEO without providing the details of the person reporting the concerns.

If you'd like to query or dispute an outcome

Where the person raising concerns is not satisfied with the conduct or outcome of the investigation, or final decision, they can request that either STOPline or Honey Insurance's Disclosure Officer escalate the matter to Honey Insurance's CEO for further investigation.

Information will be kept Confidential

STOPline and Honey Insurance's Disclosure Officer will keep all information provided to them, as part of a disclosure, including the identity of the person raising the concern, in secure locations, both digital and physical, and will allow access to that information only in accordance with the terms of this Policy.

Where information is provided to another individual, they will maintain confidentiality in accordance with this Policy and any directions from the Disclosure Officer.

If required to pass on any information, care will be taken not to disclose the identity of the person raising the matter, for instance by using gender neutral language and removing aspects of the information which could point towards the individual's role at Honey Insurance.

Reports may be made anonymously or using a pseudonym and still qualify for protection under this Policy.

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Where you do provide your identity, that, and information likely to lead to your identification, will only be disclosed to individuals other than Honey Insurance's Disclosure Officer, including the WIO, in the following circumstances:

- with your consent;
- to ASIC, APRA or the Australian Federal Police; or
- to a legal practitioner for the purpose of obtaining legal advice or representation about the whistleblower provisions in the *Corporations Act*.

It is illegal for a person to disclose your identity or information likely to lead to your identification apart from these circumstances.

To ensure appropriate oversight at the Honey Insurance Board of Directors level, the Disclosure Officer will prepare, submit and, if requested, speak to any matters raised or dealt with under this Policy to the Board. Any matter reported to Honey's Disclosure Officer will be included. At all times confidentiality, and where requested anonymity, will be of paramount importance.

If you believe there has been a breach of your confidentiality, you may lodge a complaint with Honey Insurance's Disclosure Officer or, if they are the subject of the breach, to Honey Insurance's CEO. In this instance, you would also be free to seek independent legal advice or lodge a complaint with ASIC, APRA or the ATO as appropriate.

Protection for Whistleblowers

Honey Insurance will endeavour to protect individuals who disclose conduct under this Policy and provide support to them, including in the following ways:

- Honey Insurance's Disclosure Officer will consider the risk of any detriment against the individual as soon as possible after receiving notice of a concern and take any steps considered necessary to reduce that risk;
- individuals may contact the Whistleblower Support Officer directly to discuss concerns they have, and steps that may be taken to reduce those concerns;
- any additional support requested by the individual which, in Honey Insurance's opinion, is reasonable.

Support for individuals mentioned in a disclosure

Honey Insurance will treat any Honey Insurance Employees mentioned in a disclosure made under this Policy fairly, including :

- maintaining the confidentiality of those mentioned where practical and appropriate in the circumstances;
- advising the individual as and when required and prior to any actions being taken; and
- advising the individual of the outcome of any investigation.

You will still qualify for protection under the *Corporations Act* and this Policy if the information disclosed turns out to be incorrect, provided you had reasonable grounds to suspect it was correct. If it is shown that you have made a false report without reasonable grounds then that conduct itself will be considered a serious matter. In that case, you will not be protected under this Policy and you may be subject to legal or disciplinary action which can include dismissal.

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Note that you may not be protected under this Policy if you have been found to have been materially involved in conduct you are reporting, although in some cases the making of a report may be a mitigating factor.