

# Whistleblowing Policy and Procedure

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|----------------------|-------------------------------------|-----------------------|-----------------------------------------|
| <b>Process Area</b>  | Quality, Risk and Compliance        | <b>Policy Owner:</b>  | Group Safety, Risk & Compliance Manager |
| <b>Policy Title:</b> | Whistleblowing Policy and Procedure | <b>Revision No.:</b>  | 4                                       |
| <b>Policy No.:</b>   | PO-060                              | <b>Revision Date:</b> | 20 <sup>th</sup> June 2025              |

This policy is applicable to the Adcorp Group of companies, its affiliates and subsidiaries in all geographies in which it operates hereinafter referred to as “Adcorp”. BLU by Adcorp hereinafter referred to as BLU by Adcorp as an Adcorp company and its Board of Directors (“the Board”) recognises its obligation to oversee that appropriate controls and procedures are implemented within the Adcorp Group.

## 1. Introduction

Whistle blowing is the release of information by a member or former member of, or persons associated with, an organization that is evidence of illegal or immoral conduct in the organization or conduct in the organization that is not in the public interest.

BLU by Adcorp is committed to the highest standards of openness, probity and accountability. We therefore recognise that employees who raise concerns are an asset not a threat.

It is important to us that any dishonesty, fraud, misconduct or wrongdoing by workers or officers of the organisation is reported and properly dealt with. The organisation therefore encourages all individuals to raise any concerns that they may have about the conduct of others in the organisation or the way in which the organisation is run.

This policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with.

This policy applies to all employees, workers, Managers, Directors and Trustees of the organisation. Other individuals performing functions in relation to the organisation, such as agency workers and contractors, are also encouraged to use it.

## 2. Principles

This whistleblowing policy is intended to provide protections for you if you raise concerns regarding wrongdoing in BLU by Adcorp, such as concerns regarding:

- incorrect financial reporting;
- unlawful activity;
- Activities that are not in line with **Adcorp Group** policy, including **Adcorp Group** code of ethics which otherwise amount to serious misconduct.

Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Workers should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.

Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially. The organisation will provide the independent service provider of the whistleblowing hotline with a monthly status update on all matters reported. If the whistle-

blower is known to the organisation or the service provider, the person will be contacted and given feedback. If the whistle-blower is anonymous, the person would need to contact the service provider to request feedback.

No worker will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the worker will not be prejudiced because he/she has raised a legitimate concern.

Employees have the right to make appropriate external disclosure through the **Adcorp Group** Ethics Hotline by reporting the matter to the independent service provider, without going through the internal procedure first. The organisation, however, would encourage the employee to raise the matter with their manager, designated person, Head of Division, Director, Managing Executive or the Managing Director prior to doing so, unless there are genuine and well-founded grounds for not doing so.

If misconduct is discovered as a result of any investigation under this procedure the disciplinary procedure will be used, in addition to any appropriate external measures.

An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, **workers should not agree to remain silent**. You should report the matter to a director or person senior to the person asking you not to report the wrongdoing.

### 3. Procedure

This procedure is for disclosures about matters other than a perceived actual or potential breach of an employee's own contract of employment. In cases of breaches of contract of employment you should use the Grievance Procedure.

#### Reporting channels:

1. Internal Reporting:  
Inform your line manager, the People and Culture Manager, Quality and/or the Managing Executive/Director.
2. External Reporting:  
If you do not feel comfortable to inform one of the key members above, or you have exhausted all internal reporting channels, please make use of the independent reporting facility: **Adcorp Group** Ethics Line (**refer Annexure A**).

#### Investigation Process:

All matters will be investigated by following the forensics investigations manual, including the forensics notice protocol.

- All matters reported will be investigated
- Investigations will be conducted by an independent internal team / external party
- The investigation may involve obtaining written statement
- Where appropriate, the matter will be escalated to the appropriate government department, donor or regulatory agency

The organisation will provide the independent service provider of the whistleblowing hotline with a monthly status update on all matters reported. If the whistle-blower is known to the organisation or the service provider, the person will be contacted and given feedback. If the whistle-blower is anonymous, the person would need to contact the service provider to request feedback.

#### **4. Safeguards**

Harassment or Victimization - Harassment or victimization for reporting concerns under this policy will not be tolerated. Victimization of a worker for making a disclosure will be a disciplinary offence.

Confidentiality - Every effort will be made to treat the complainant's identity with appropriate regard for confidentiality.

Anonymous Allegations - This policy encourages employees to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be explored appropriately, but consideration will be given to:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from other attributable sources.

#### **5. False Reporting**

There may be instances where a disclosure is made, based on genuine belief by the worker that something is wrong at a particular time, which is subsequently demonstrated to be false or inaccurate. In such circumstances, if the worker is not anonymous, the organization will inform the worker of the high level discrepancy between their report and the facts at hand. Provided the organisation is satisfied that the worker acted in good faith and had a genuine belief that such a situation should be reported, no further action will be taken.

If it becomes apparent to the manager and/or People and Culture Manager that the worker making the disclosure has acted maliciously or frivolously, or has acted for personal gain, this will be dealt with through the organisation's disciplinary process. Action taken may include summary dismissal for gross misconduct.

Approved by



**Zebulun Riddell**  
Managing Director  
June 2025

# Document Control

## Approval

|                 | Title                    | Name        |
|-----------------|--------------------------|-------------|
| <b>Owner</b>    | People & Culture Manager | Laura Keane |
| <b>Approver</b> | Managing Director        | Zeb Riddell |

*Note: This document has been approved electronically within the BLU by Adcorp Policy & Process Library*

## Document History

The following table lists the changes made to this document:

| Revision | Date      | Amended By | Details of Change                  |
|----------|-----------|------------|------------------------------------|
| 2        | 8/2/2024  | C.Bailey   | Align to Adcorp                    |
| 3        | 13/5/2024 | C.Bailey   | Changed owner and approver         |
| 4        | 23/6/2025 | S Ramsay   | Change Logo/Rebranding/Colours etc |

**ANNEXURE A****Tip-offs Line and Protected Disclosures Act**

- a. BLU by Adcorp through Adcorp has implemented a tip-offs line to facilitate the anonymous reporting of fraud or dishonest and unethical behavior.
- b. In addition to the above, where an employee prefers not to remain anonymous, he or she is protected under the Protected Disclosures Act (commonly known as the "Whistleblower's Act") in bringing to the attention of BLU by Adcorp, bona fide allegations in good faith and in terms of the Act.
- c. An employee may choose to remain anonymous and under these circumstances can contact the Deloitte independently managed Adcorp Tip-offs line using the details below:
  - I. Free Call: 0800 22 32 11
  - II. Website: <http://www.tip-offs.com>
  - III. Email: [advalue@tip-offs.com](mailto:advalue@tip-offs.com)
- d. Disclosures will be received by Deloitte Tip-offs Anonymous, and reports will be prepared for communication to the authorized Adcorp individuals to investigate.
  - i. Reports are sent to Adcorp Group Head of Risk and Compliance and General Counsel and Company Secretary
  - ii. Should any of the above roles be implicated in the report, the report is escalated directly to the Group CEO
  - iii. Should the Group CEO be implicated in the report, the report is then escalated to the Chairperson of the Audit and Risk Committee. (A sub-committee of the board)
- e. The reports will include only objectively presented information that is in direct relation to the scope of any investigation undertaken for the verification of the alleged facts.
- f. All reports provided to the authorised BLU by Adcorp individuals will eliminate any element that could identify the employee making the disclosure. This means that the employee will remain totally anonymous if they have chosen to use this option.
  - I. However, the identity of an employee will be provided to BLU by Adcorp if any of the following conditions are met:
    - II. The employee has given their verbal consent to the Adcorp Tip-offs line, the external service provider, to communicate their identity to Adcorp;
    - III. The employee concerned commits a criminal offence by making that disclosure; or
    - IV. The disclosure is made by a legal adviser to whom the information concerned was disclosed in the course of obtaining legal advice.