JCurve Solutions Limited
Whistleblowing Policy

At JCurve Solutions we are committed to the highest standards of conduct and ethical behaviour in all our business activities, and to promote and support a culture of honest and ethical behaviour, corporate compliance and good corporate governance.

We encourage the reporting of any instances of suspected unethical, illegal, fraudulent or undesirable conduct involving JCurve Solutions business, and will ensure that those persons who make a report shall do so without fear of intimidation, disadvantage or reprisal.

This Policy has been developed to align with, and is underpinned by the JCurve Solutions values, which are set out in our Code of Conduct.

1. What is Reportable Conduct?

You may make a report under this policy if you suspect on reasonable grounds that a JCurve Solutions Director, employee, contractor, supplier, tenderer or other person who has business dealings with JCurve Solutions has engaged in conduct (Reportable Conduct) which may have contravened a provision of the Fair Work Registered Organisations Act, the Fair Work Act, the *Corporations Act* 2001, the *Competition and Consumer Act* 2010 or constitutes an offence against a law of the Commonwealth.

This includes, but is not limited to:

- is dishonest, fraudulent or corrupt activity, including bribery or other activity;
- is illegal activity (such as theft, drug sale or use, violence, harassment or intimidation, criminal damage to property or other breaches of state or federal law);
- is unethical or in breach of JCurve Solutions' policies (such as dishonestly altering company records or data, adopting questionable accounting practices or willfully breaching JCurve Solutions policies or procedures);
- is potentially damaging to JCurve Solutions, a JCurve Solutions employee or a third party, such as unsafe work practices, environmental damage, health risks or abuse of JCurve Solutions property or resources;
- amounts to an abuse of authority;
- may cause financial loss to JCurve Solutions or damage its reputation or be otherwise detrimental to JCurve Solutions interests;
- involves harassment, discrimination, victimisation or bullying;
- involves any other kind of serious impropriety;
- represents a danger to the public or the financial system.

This reportable conduct covers personal work-related grievances in certain limited circumstances. A disclosure of a work-related grievance will only be protected if it relates to systemic issues or involves detrimental conduct to the whistleblower. A disclosure of a work-related grievance will also be protected if it is made to a legal practitioner to obtain legal advice or representation in relation to the whistleblower provisions.

2. Who Can Make a Report?

Reports can be made by the below persons, whether they be current or former:

- Employees
- Contractors or Suppliers (including employees of suppliers)
- An individual who is an associate of JCurve Solutions (as defined in the *Corporations Act* 2001)
- Spouses and direct relatives of any of the above

3. Who Can I Make a Report to?

JCurve Solutions has several channels for making a report if a person becomes aware of any issue or behaviour which he or she considers to be Reportable Conduct:

Any person may make a report to any of the following Protected Disclosure Officers:

Stephen Canning
Chief Executive Officer
stephen.canning@jcurvesolutions.com

James Aulsebrook
Chief Financial Officer
james.aulsebrook@jcurvesolutions.com

Reports may also be made by post to:

Level 8, 9 Help Street
Chatswood NSW 2067
(Marked "Private and Confidential" to the attention of one of the Protected Disclosure Officers referred to above).

Alternatively, you may wish to write or email the JCurve Solutions Auditor:

BDO Audit Pty Ltd
Gareth Few
Partner
Level 11, 1 Margaret Street
Sydney, NSW, Australia, 2000
Gareth.Few@bdo.com.au

Reports can also be made directly to the Australian Securities and Investment Commission (ASIC) via the below webpage: https://asic.gov.au/report-misconduct

or to Australian Prudential Regulation Authority (APRA) either via email to: pid@apra.gov.au

or via mail to:

Chief Risk Officer
APRA
GPO Box 9836
Sydney NSW 2001

If the Auditor does receive a report, they will provide the details of the disclosure to an appropriate Protected Disclosure Officer listed above. Where a discloser provides their contact details to BDO East Coast Partnership, those contact details will not be provided to the Protected Disclosure Officer without the discloser's consent.

Whistleblowers who do not want their contact details known by Protected Disclosure Officers from JCurve Solutions' management or its Board of Directors should make their disclosure to JCurve Solutions' auditors and request their contact details are not provided to any of the Protected Disclosure Officers. This will ensure their anonymity from JCurve Solutions.

4. JCurve Solutions Investigation of Reportable Conduct

JCurve Solutions will investigate all matters reported under this Policy as soon as possible after the matter has been reported. A Protected Disclosure Officer may, with the whistleblower's consent, appoint a person to assist in the investigation of a matter raised in a report. Where appropriate, JCurve Solutions will provide feedback to the whistleblower regarding the investigation's progress and/or outcome (subject to considerations of the privacy of those against whom allegations are made).

The investigation will be conducted in an objective and fair manner, and otherwise as is reasonable and appropriate having regard to the nature of the Reportable Conduct and the circumstances.

5. Protection of Whistleblowers

JCurve Solutions is committed to ensuring confidentiality in respect of all matters raised under this policy, and that those who make a report in good faith are treated fairly and do not suffer any disadvantage.

(a) Protection of your identity and confidentiality

Subject to compliance with legal requirements, upon receiving a report under this Policy, JCurve Solutions will not, nor will any supervisor, manager or Protected Disclosure Officer, disclose any particulars that would suggest or reveal your identity as a whistleblower, without first obtaining your consent.

Any disclosure that you consent to will be disclosed on a strictly confidential basis. However, the Protected Disclosure Officer is able to disclose the complaint without your consent to NSW Police, ACNC, ASIC, APRA or the Australian Federal Police.

(b) Protection of files and records

All files and records created from an investigation will be retained under strict security and unauthorised release of information to someone not involved in the investigation (other than senior managers or directors who need to know to take appropriate action, or for corporate governance purposes) without your consent as a whistleblower will be a breach of this policy.

Whistleblowers are assured that a release of information in breach of this policy will be regarded as a serious matter and will be dealt with under the Complaints and Grievance Policy.

(c) Fairness

Any JCurve Solutions employee or volunteer who is subjected to detrimental treatment as a result of making a report in good faith under this policy should inform a Protect Disclosure Officer immediately.

If the matter is not remedied, it should be raised with the Chairman of JCurve Solutions Limited.

Detrimental treatment includes dismissal, demotion, harassment, discrimination, disciplinary action, bias, threats or other unfavourable treatment connected with making a report.

The *Corporations Act* 2001 (Cwlth) also gives special protection to disclosures about breaches of that Act, as long as certain conditions are met.

6. Duties of Employees and Volunteers in relation to Reportable Conduct

It is expected that employees or volunteers of JCurve Solutions who become aware of known, suspected, or potential cases of Reportable Conduct will make a report under this policy or under other applicable policies.

7. Reporting Procedures

Business units and Protected Disclosure Officers (as appropriate) will report to the Board of Directors on the number and type of whistleblower incident reports annually, to enable JCurve Solutions to address any issues at a business unit and/or company level.

These reports will be made on a 'no names' basis, maintaining the confidentiality of matters raised under this policy.

The Audit and Risk Committee will receive copies of all whistleblower reports from Protected Disclosure Officers (as appropriate). In addition, serious and/or material Reportable Conduct will be considered by the Protected Disclosure Officers for immediate referral to the Chairman of the Audit and Risk Committee (David Franks).

8. Reporting Procedures

The policy will be reviewed regularly periodically and updated as required to ensure it remains consistent with current law and practice. The latest version of this policy can be found on the Company's website or obtained from the Company Secretary.

<u>Policy History</u>

Established:	25 June 2019
Last review:	30 June 2021 (effective)