Whistleblower Policy

Entity:	OFX Group Limited
Owner:	Company Secretary
Created:	December 2013
Updated:	August 2018
Approved by:	OFX Group Limited Board

Unless otherwise indicated, OFX Group Limited and its Related Bodies Corporate (**OFX**) owns the copyright in the content in this Policy. You may only access and use the content for non-commercial or personal use unless you have prior written approval from us. All other use, copying or reproduction of this Policy or any part of it is prohibited (except to the extent permitted by law). None of the content or any part of it may be reproduced. If you seek to reproduce or otherwise use the content in any way it is your responsibility to obtain approval for such use where necessary on +61 2 8667 8000.

Commitment

OFX Group Limited and its related bodies corporate (as defined in the *Corporations Act 2001* (Cth)) (**OFX**) is committed to the highest standards of ethical conduct in all of its business activities.

Purpose of this Policy

The purpose of the Whistleblower Policy (**Policy**) is to support OFX's commitment to the highest standards of ethical conduct and to provide all Eligible Whistleblowers (defined below) of OFX with the means to raise concerns, without the fear of repercussions, regarding actual or suspected Disclosable Conduct (defined below).

This Policy sets out the legal protections available to Eligible Whistleblowers to make reports of actual or suspected Disclosable Conduct and provides information about how OFX will protect and support them and investigate their disclosures.

OFX encourages openness and will support Eligible Whistleblowers who raise genuine concerns under this Policy, even if they turn out to be mistaken.

Who is covered by this Policy?

This policy applies to the activities of OFX and its subsidiaries and affiliates anywhere in the world. It is applicable to all current and former:

- officers (eg. directors) of OFX;
- employees of OFX;
- individuals who have a contract for the supply of services or goods to OFX (eg. contractors);
- employees of a person who has a contract for the supply of services or goods to OFX;
- associates (e.g. partners) of OFX; or
- a spouse, child or dependant of any of the above,

(collectively, **Eligible Whistleblowers**).

Notwithstanding the above, for UK residents that in the United Kingdom protection for whistleblowers is only afforded to workers, which is defined widely to mean self-employed workers, agency staff and trainees as well as normal employees.

What is "Disclosable Conduct"?

To be a protected disclosure, the Eligible Whistleblower needs to have objectively reasonable grounds to suspect that misconduct, or an improper state of affairs or circumstances exists in relation to OFX or its related bodies corporate or may have been engaged in by OFX or its related bodies corporate and extends to improper conduct that has happened or will happen, as well as improper conduct that is currently happening (**Disclosable Conduct**).

Disclosable Conduct includes, but is not limited to, conduct that is:

- dishonest;
- fraudulent;

- corrupt;
- illegal;
- harassment, discrimination or bullying;
- unethical or otherwise has the potential to damage OFX's reputation;
- in breach of OFX's policies or Code of Conduct; or
- represents a danger to the public or the financial system.

For example, Disclosable Conduct could include a failure to comply with a financial services license or reporting obligations under the respective anti-money laundering and counter-terrorism financing laws (including, but not limited to, Australia, New Zealand, Hong Kong, Singapore, Canada, the United States and the United Kingdom). Other examples include disclosures concerning corporate corruption, bribery, fraud or other serious misconduct.

Disclosable Conduct also includes concealed reportable conduct and any conduct which comprises retaliation against any person who raises concerns of actual or suspected Disclosable Conduct under this policy or against anyone who helps address a concern raised.

How do I raise a concern about possible Disclosable Conduct?

Eligible Whistleblowers are encouraged to report any concerns through the normal reporting channels (i.e. where applicable through their immediate or next higher-level manager) in order to keep an open communication.

- If an Eligible Whistleblower feels uncomfortable raising the concern, or is unable to, through the normal reporting channels, they are encouraged to report the concern to a Whistleblower Protection Officer. The current Whistleblower Protection Officers nominated by OFX are:
    - the Chief Legal Officer and Company Secretary;
    - the Chief Risk Officer; and
    - the Chief People and Culture Officer

- If, for any reason, the Eligible Whistleblower feels uncomfortable, or is unable to, raise the concern to a Whistleblower Protection Officer, they are encouraged to report the concern through the OFX Online Reporting Portal – Whispli: https://ofx.whispli.com/speakup)

How do I submit a report?

To submit a formal report of Disclosable Conduct, you can:

1. complete an Online Disclosable Conduct Form accessible through the OFX Online Reporting Portal (https://ofx.whispli.com/speakup), which is available to internal and external parties;

2. report the matter to a Whistleblower Protection Officer by email (privacy@ofx.com) or letter (ATT: Whistleblower Protection Officer, OFX, Level 19, 60 Margaret Street, Sydney NSW 2000, Australia); or

3. for the United Kingdom only, contact Public Concern at Work, an independent whistleblowing charity in the United Kingdom which provides free help to prospective whistleblowers and advice on whistleblowing laws:

- E-mail: whistle@pcaw.co.uk
- Website: www.pcaw.co.uk

How can I make a report anonymously?

An Eligible Whistleblower can always choose to make a report anonymously by reporting the event through the OFX Online Reporting Portal (https://ofx.whispli.com/speakup) and choosing to remain anonymous or sending an anonymous written report directly to a Whistleblower Protection Officer at Level 19, 60 Margaret Street, Sydney NSW 2000, Australia.

If an Eligible Whistleblower is comfortable enough to identify themselves when making a report, they can ask that the Whistleblower Protection Officer for follows up and to provide feedback on the outcome of any investigation.

What happens after I make a report?

If you raise a report under this Policy, then it will be assessed and investigated within a reasonable time frame. The investigation process includes:

1. **Assigning an investigation team -** Experts with the right knowledge and objectivity will be assigned to investigate.

2. **Conducting the investigation -** Investigations will be conducted in a fair and confidential manner. The team will determine the facts through interviews and/or review of documents as necessary.

3. **Corrective action -** If necessary, depending on the outcome of the findings of the investigation, the team will recommend corrective actions to the appropriate managers for implementation.

4. **Feedback -** The Eligible Whistleblower raising the concern will receive feedback on the outcome provided it was not raised anonymously. If you are an external party and your report is assessed as relating to a concern or complaint about a product or service provided by OFX rather than to Disclosable Conduct, then the report will be handled in accordance with the relevant OFX Complaints Policy for further investigation and resolution.

Will my report be treated confidentially?

Subject to relevant laws, OFX and any persons receiving reports will not disclose particulars of reported matters that would suggest the identity of the Eligible Whistleblower without obtaining the Eligible Whistleblower's prior consent. Any such disclosure to which the Whistleblower consents will be on a strictly confidential basis.

All files and records created from an investigation will be retained under strict security. Subject to relevant laws, the unauthorised release of information without an Eligible Whistleblower's consent to any person not involved in the investigation (other than the OFX Audit Risk and Compliance Committee) is a breach of this Policy.

Will I be protected if I submit a report?

Eligible Whistleblowers have certain protections granted to them under the relevant legislation and OFX will support Eligible Whistleblowers who raise genuine concerns under this Policy, even if they turn out to be mistaken. In addition, OFX will not tolerate any retaliation against any person who raises a report of Disclosable Conduct or helps to address a concern raised. Any such retaliatory action may be grounds for disciplinary action up to and including dismissal.

This Policy does not restrict rights to make disclosure to relevant regulators and disclosure to a lawyer for the purposes of obtaining legal advice. Additionally, protection may also be provided in exceptional circumstances to an Eligible Whistleblower who makes a report to a member of parliament or journalist where the Eligible Whistleblower reasonably believes there is an imminent risk of serious harm or danger to public health or safety, or to the financial system if the information is not acted on immediately, and if a reasonable period has passed since the Eligible Whistleblower first made a protected disclosure within the applicable organisation.

Notwithstanding the above, please note that for the disclosure to be protected by the applicable whistleblowing laws in the United Kingdom, the report should be made through OFX, but it can also be made through various 'prescribed persons'. A list of prescribed persons can be found at: https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-peopleand-bodies--2.

Reporting

The OFX Audit Risk and Compliance Committee (**ARCC**) will receive copies of all reports from the Eligible Whistleblower Protection Officers. Subject to relevant laws, anonymity and confidentiality requirements will be observed by the ARCC and OFX.

Review of this Policy

The Company Secretary and the ARCC will monitor and annually review the effectiveness of this Policy.

Amendment of this policy

This Policy can only be amended with the approval of the OFX Board.

Disclaimer

While every care has been taken in the preparation of this Policy, OFX cannot accept responsibility for any errors, including those caused by negligence, in the material. OFX makes no statements, representations or warranties about the accuracy or completeness of the information and you should not rely on it. You are advised to make your own independent inquiries regarding the accuracy of any information provided in this Policy.