

5.8 PayGroup Ltd Whistleblower Protection Policy

Objective

The purpose of this Policy is to:

- a) encourage reporting of unethical, corrupt and illegal practices, and any breach of PayGroup Limited's (PayGroup) Code of Conduct;
- b) assist in obtaining information on suspected Improper Conduct so that PayGroup may address it;
- c) identify how to report suspected Improper Conduct, including access to a helpline for reporting suspected improper conduct which can be anonymous;
- d) help protect people who report suspected Improper Conduct.

Policy

1. Policy Statement

PayGroup is committed to conducting our business in a lawful and ethical manner. The company expects and requires its staff to perform their duties in a lawful and ethical manner. PayGroup views having this policy as an important benefit to it as one mechanism to ensure that any Improper Conduct is appropriately identified and dealt with.

PayGroup may take prompt action against those who engage in improper conduct, up to and including termination of employment.

Any person (**Complainant**) suspecting improper conduct by PayGroup staff may report a complaint (**Complaint**) so that PayGroup may respond to it under this Policy.

At this time, if a Complainant lodges a Complaint in good faith, that person may be a whistleblower. There is proposed legislation that changes this so that a Complainant needs only to have reasonable grounds to suspect Improper Conduct has occurred. PayGroup is committed to affording that person the benefits and protections identified in this Policy and current and proposed legislation, so as to foster an open environment in which whistleblowers may come forward without fear of retribution or retaliation. The protections include helping whistleblowers to remain anonymous. This policy adopts current and the proposed whistleblower legislation, if and when it becomes law.

Whistleblower Protection

PayGroup encourages all PayGroup personnel to feel free to provide information about suspected improper conduct by PayGroup by:

- Reporting the matter to the Chief Financial Officer who is PayGroup's designated Whistleblower Investigations Officer; or
- Emailing or calling the helpline which is operated for PayGroup by Justin Owen, PayGroup's designated Whistleblower Protection Officer as follows:

Email: paygroup.whistleblower@gmail.com

Tel: +61 3 8692 7248

Tel +61 421 050 405

You may also qualify for immunity from any action PayGroup may take, and from prosecution by relevant authorities, concerning Improper Conduct you have been involved in. The Whistleblower Protection Officer can advise you further on this.

Complainants may choose to remain anonymous when making a Complaint. If a Complainant supplies his or her details, PayGroup will not disclose them outside PayGroup without consent, unless required by law or if necessary to investigate serious suspected improper conduct, such as an actual or potential criminal offence. In those instances, the Complainant may also need to assist the authorities with enquiries.

PayGroup is committed to fostering an environment in which Complainants feel free to bring forward concerns about suspected improper conduct, understanding that PayGroup will treat them seriously and take appropriate action. PayGroup will not tolerate PayGroup personnel taking adverse action against Complainants, such as reprisals, retaliation or victimisation and will take all reasonable measures to guard Complainants from such behaviour. Complainants are encouraged to report any such behaviours if they experience them. However, false reporting through these channels will be regarded as a serious matter and may result in disciplinary action up to and including termination of employment.

Where reprisals are taken or are claimed to have been taken against a Complainant, the Complainant will have an automatic right of appeal to the Whistleblower Protection Officer.

2. Reporting

The first line of reporting is to the Whistleblower Investigations Officer.

You can also email the Whistleblower Protection Officer at:

Email: paygroup.whistleblower@gmail.com

You may identify yourself or remain anonymous (except where anonymous reporting is prohibited by local law).

When reporting a concern or making an allegation, you will be asked to provide as much information about the suspected violation, such as the name of your organisation, the name of the people involved, and other details so that PayGroup can investigate.

To further protect your anonymity:

- call summary reports do not identify your gender.
- calls are not recorded.
- no attempts are made to identify your telephone number through the use of "Caller ID."

Every concern or allegation will be handled promptly, discretely, and professionally. PayGroup will investigate all reports of improper conduct and take appropriate action to resolve each reported matter.

3. Lodging a Complaint

Complaints may be oral or in writing. In each case a Complainant needs to identify the following matters:

- their name, organization and contact details (phone and address) (if they are prepared to give this information);
- nature of the Complaint;
- all relevant facts giving rise to the Complaint;

- name of the relevant PayGroup Department or business which is the subject of the Complaint;
- the name(s) of all PayGroup Personnel involved;
- an acknowledgement that the information you have provided: (i) is a true and accurate representation of the events which have occurred and that have led to the Complaint; and (ii) does not contain any misleading statements or omissions; and
- whether you consent to the disclosure of your name (if provided).

Complaints can be made using the same contact details referred to above.

4. Investigations

4.1. The Investigation Process

All investigations of improper conduct will be conducted. Investigations follow a process designed to promote consistency and fairness in the conduct of investigations across the company. The investigations cycle covers a number of steps, including gathering and reviewing relevant information and interviewing those who may be able to provide information.

4.2. The Investigation Principles

The investigation process embraces a number of key elements of fairness and natural justice, including the following principles:

- Independent
- Objective
- Thorough
- Professional
- Confidential
- Timely
- Cost Effective

PayGroup will keep the Complainant informed of the outcome of the investigation subject to privacy considerations of those against whom the allegations are made and provided the Complainant agrees in writing to maintain confidentiality of all related information provided to the Complainant.

Once the investigation is completed, PayGroup will advise the Complainant that the matter is closed. If you have concerns about the way in which an investigation was conducted, you may raise this concern to the CEO

5. Education and Training of Employees

Information about this Policy will be provided to PayGroup Personnel as part of their induction process and any ongoing training in compliance areas.

6. Review

This Policy will be reviewed annually by PayGroup's Audit and Risk Committee to ensure relevance and effectiveness.