Whistleblowing Policy

1. Purpose and Commitment

Ultimate Security Australia Pty Ltd ("Ultimate Security" or "the Company") is committed to conducting its operations lawfully, ethically, and responsibly, and to maintaining the highest standards of integrity, transparency, and accountability.

The Company recognises that an effective whistleblowing framework is a critical component of sound corporate governance, risk management, and regulatory compliance. It supports the early identification and remediation of misconduct or improper conduct and promotes a culture where individuals feel safe to raise concerns.

This Policy is established in accordance with the whistleblower protection regime set out in Part 9.4AAA of the Corporations Act 2001 (Cth) and is intended to ensure that eligible individuals are able to raise concerns in a safe, confidential, and supportive manner without fear of reprisal or adverse consequences.

Ultimate Security encourages the reporting of wrongdoing and will ensure that disclosures are handled responsibly, confidentially, and in accordance with applicable laws and regulatory requirements.

2. Scope and Application

This Policy applies to disclosures made about Ultimate Security Australia Pty Ltd or any related body corporate.

It applies to eligible whistleblowers including:

- Current and former employees
- Officers and directors
- Contractors, subcontractors and consultants
- Suppliers and their employees
- Associates of the Company
- Relatives, spouses and dependants of the above individuals

This Policy applies regardless of the location in which the conduct occurred.

Level 2, 111 Parramatta Road Concord NSW 2137
Ph 1300 850 5911 ABN: 72 168 832 013
www.ultimatesecurity.com.au
Company Security Licenses:
NSW 000100975 | ACT 17502293 | QLD 3728519
SA ISL-264944 | VIC 894 336 71S | WA SA51733
TAS21152 | NT SFL108

3. Definitions

For the purposes of this Policy:

Eligible Whistleblower
An individual who qualifies for protection under Part 9.4AAA of the Corporations Act 2001 (Cth), including a current or former employee, officer, director, contractor, consultant, supplier, associate, or their relatives, spouses, or dependants.

Disclosable Matter
Information where the whistleblower has reasonable grounds to suspect misconduct or an improper state of affairs or circumstances in relation to Ultimate Security, including breaches of law, unethical conduct, or conduct that represents a danger to individuals, the public, or the financial system.

Personal Work-Related Grievance
Has the meaning given in the Corporations Act 2001 (Cth) and generally relates to a grievance about a whistleblower's employment that has personal implications for the whistleblower only.

Detriment
Includes any actual or threatened conduct that causes harm to a whistleblower, including:

- dismissal
- demotion
- harassment or discrimination
- intimidation
- alteration of duties to the whistleblower's disadvantage
- damage to reputation
- or any other adverse treatment.

4. Disclosable Matters

Ultimate Security encourages the disclosure of information where the whistleblower has reasonable grounds to suspect misconduct or an improper state of affairs or circumstances in relation to the Company.

This includes, but is not limited to:

- Fraud
- Corruption
- Bribery
- Theft
- Dishonesty
- Unethical conduct
- Serious or systemic breaches of company policies or the Code of Conduct
- Unsafe or unlawful work practices
- Modern slavery or labour law breaches
- Conduct that poses a material risk to individuals, the public, or the financial system
- Breaches of applicable state or territory security licensing legislation
- Unlicensed guarding activities or the provision of security services without appropriate regulatory authorisation

Personal work-related grievances are generally excluded from this Policy unless they fall within the scope of statutory whistleblower protections.

Level 2, 111 Parramatta Road Concord NSW 2137
Ph 1300 850 5911 ABN: 72 168 832 013
www.ultimatesecurity.com.au
Company Security Licenses:
NSW 000100975 | ACT 17502293 | QLD 3728519
SA ISL-264944 | VIC 894 336 71S | WA SA51733
TAS21152 | NT SFL108

5. To Whom a Disclosure May Be Made

An eligible whistleblower may make a disclosure to an authorised recipient, including:

- an officer or director of the Company
- the Company Secretary
- an internal or external auditor
- a member of senior management authorised to receive whistleblower disclosures

A whistleblower may also make a disclosure to a **legal practitioner** for the purpose of obtaining legal advice or legal representation regarding whistleblower protections.

Disclosures may also be made to prescribed regulators including:

- the Australian Securities and Investments Commission
- the Australian Prudential Regulation Authority

Disclosures may be made anonymously and do not need to be reported through a whistleblower's direct line manager.

6. Confidentiality and Anonymity

Ultimate Security is legally and ethically committed to protecting the confidentiality of whistleblowers.
The identity of a whistleblower will not be disclosed without their consent except where disclosure is permitted or required by law.

All reasonable steps will be taken to reduce the risk that a whistleblower may be identified. Information relating to a disclosure will be handled securely and on a strictly need-to-know basis.

Whistleblowers may choose to remain anonymous throughout the disclosure process, including during and after any investigation.

7. Fair Treatment of Individuals Named in Disclosures

Ultimate Security recognises that disclosures made under this Policy may involve allegations or information relating to employees, officers, contractors, or other individuals associated with the Company.

The Company is committed to ensuring that any individual who is the subject of a disclosure is treated fairly, objectively, and in accordance with principles of procedural fairness and natural justice.
This includes:

- handling disclosures confidentially and sensitively
- ensuring allegations are assessed impartially and based on available evidence
- providing individuals with an opportunity to respond to allegations where appropriate and lawful to do so
- taking reasonable steps to protect individuals from reputational harm arising from unsubstantiated or malicious disclosures.

No adverse action will be taken against any individual solely because they are named in a disclosure unless and until misconduct has been appropriately assessed and substantiated through a proper investigation process.

Level 2, 111 Parramatta Road Concord NSW 2137
Ph 1300 850 5911 ABN: 72 168 832 013
www.ultimatesecurity.com.au
Company Security Licenses:
NSW 000100975 | ACT 17502293 | QLD 3728519
SA ISL-264944 | VIC 894 336 71S | WA SA51733
TAS21152 | NT SFL108

8. Protection from Detriment

Ultimate Security strictly prohibits any form of detriment against a whistleblower who makes a disclosure in good faith.

Any person who engages in retaliatory, victimising, or harmful conduct against a whistleblower may be subject to disciplinary action up to and including termination of employment or contract.

Such conduct may also expose the individual and the Company to civil or criminal liability under applicable legislation.

9. Investigation and Oversight

All disclosures made under this Policy will be assessed objectively and managed in a fair, independent, and timely manner.

Investigations will be conducted by appropriately qualified internal or external parties having regard to the nature and seriousness of the matter.

Appropriate executive oversight will be maintained throughout the investigation process.

Where a disclosure involves senior management or the Chief Executive Officer, oversight will be exercised by the Board or an independent external adviser to ensure impartiality and independence.

10. False and Malicious Disclosures

A whistleblower who makes a disclosure honestly and in good faith will not be subject to any adverse treatment solely because the disclosure is not ultimately substantiated.

However, disclosures that are knowingly false, misleading, or made with malicious intent may constitute a breach of company policies and may result in disciplinary or other appropriate action.

How to Make a Disclosure

Disclosures may be made via the following channels:
Email: whistleblower@ultimatesecurity.com.au

Direct reporting: To an officer or director of the Company.
Website reporting portal: Via the Ultimate Security website whistleblower reporting page.

Whistleblowers may choose to provide their name and contact details if they wish to receive updates regarding their disclosure; however, disclosures may also be submitted anonymously.

Level 2, 111 Parramatta Road Concord NSW 2137
Ph 1300 850 5911 ABN: 72 168 832 013
www.ultimatesecurity.com.au
Company Security Licenses:
NSW 000100975 | ACT 17502293 | QLD 3728519
SA ISL-264944 | VIC 894 336 71S | WA SA51733
TAS21152 | NT SFL108

11. Policy Availability and Review

This Policy forms part of Ultimate Security's broader governance, risk management, and compliance framework and is supported by internal procedures that prescribe reporting mechanisms, investigation protocols, roles and responsibilities, and record-keeping requirements.

The Policy will be made available to employees and relevant external parties and will be reviewed periodically to ensure ongoing compliance with legislative requirements and alignment with best practice.

Ultimate Security affirms that speaking up is a responsible and valued act that is fundamental to ethical conduct, legal compliance, and effective corporate governance.

The Company is committed to maintaining an environment in which concerns are raised in good faith, assessed independently and objectively, and addressed in a timely, proportionate, and defensible manner.

Through this commitment, Ultimate Security seeks to protect individuals and the organisation, strengthen accountability and transparency, and sustain the confidence of employees, clients, regulators, and the wider community.

Ying Loong

Ying Loong Lee
Chief Operating officer
12th January 2026

Level 2, 111 Parramatta Road Concord NSW 2137
Ph 1300 850 5911 ABN: 72 168 832 013
www.ultimatesecurity.com.au
Company Security Licenses:
NSW 000100975 | ACT 17502293 | QLD 3728519
SA ISL-264944 | VIC 894 336 71S | WA SA51733
TAS21152 | NT SFL108