# Group Whistleblower Policy

## Metrics Credit Holdings Pty Ltd

1 July 2025

## Policy Administration and Controls Schedule

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This Policy is not a term of any contract, including any contract of employment and does not impose any contractual duties, implied or otherwise, on Metrics.

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# 1 Purpose

The purpose of this policy is to foster an environment in which the reporting of any instances of suspected misconduct, or of an improper state of affairs or circumstances is encouraged. It is an important tool for helping Metrics to identify wrongdoing that may not be uncovered unless there is a safe and secure means for disclosing wrongdoing.

Metrics is committed to transparency, integrity and accountability and to creating an environment in which individuals feel free to raise legitimate issues relating to Metrics' operations and where eligible whistleblowers are protected from repercussions.

Under Australian law, the *Corporations Act 2001* (Cth) and the *Taxation Administration Act 1953* (Cth) provides protections for whistleblowers (**Whistleblower Protection Scheme**). Under New Zealand law, the *Protected Disclosure (Protection of Whistleblowers) Act 2022* (New Zealand) provides protections for whistleblowers (**NZ Whistleblowers Act**).

The purpose of this policy is to set out information relating to the Whistleblower Protection Scheme and the NZ Whistleblowers Act, including information about:

- the types of disclosures that qualify for protection.
- the protections available to whistleblowers.
- who disclosures can be made to and how they can be made.
- how Metrics will support whistleblowers and protect them from detriment.
- how Metrics will investigate disclosures.
- how Metrics will ensure fair treatment of employees who are the subject of or are mentioned in disclosures; and
- how this policy is to be made available to officers and employees of Metrics.

Metrics will perform the obligations under this policy applying to each member company in the corporate group, as applicable under the relevant laws. Where Metrics has any related bodies corporate outside of Australia, this policy may need to be read subject to any applicable overseas legislation (i.e. New Zealand):

- To ensure individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported in accordance with Metrics' values and our Code of Conduct.
- To encourage disclosure of wrongdoing.

- To help deter wrongdoing relating to Metrics' operations, in line with the Metrics' risk management and governance framework.
- To ensure disclosures are dealt with appropriately and on a timely basis.
- To provide transparency around Metrics' framework for receiving, handling and investigating disclosures.
- To support Metrics' values and Code of Conduct and promote better compliance with the law and promote a more ethical culture, by increasing awareness that there is a higher likelihood that wrongdoing will be reported.
- To support Metrics' long-term sustainability and reputation; and
- To ensure that Metrics meets its legal and regulatory obligations including under the Whistleblower Protection Scheme and the NZ Whistleblowers Act as applicable.

## 2 Scope

This policy applies to the Managing Partners, Board members (`**Board'**), our employees, contractors or anyone representing Metrics and its subsidiaries (which includes Metrics Real Estate Partners and the Navalo Financial Services businesses), collectively the Metrics Group (`**Metrics'**).

This policy provides protections in relation to disclosure of information by any Whistleblower in relation to Disclosable Conduct in accordance with this policy.

- A **Whistleblower** is an individual who is, or has been, any of the following in relation to Metrics:
- an officer or employee (e.g. current and former employees who are permanent, part-time, fixed-term or temporary, interns, secondees, managers, and directors) including employees of Metrics Credit Partners (NZ) Limited (NZ Employees).
- an individual who is an associate of Metrics.
- an individual who supplies services or goods to Metrics (whether paid or unpaid), or an employee of a supplier (e.g. current and former contractors, consultants, service providers and business partners); and
- a relative, dependant or spouse of any individual referred to above.

## 3 What is Disclosable Conduct?

A disclosure of information concerns **Disclosable Conduct** where a person has objectively reasonable grounds to suspect that the information indicates:

- Serious misconduct (i.e. fraud, negligence, default, breach of trust and breach of duty) or an improper state of affairs or circumstances (including tax affairs) in relation to Metrics, whether such conduct involves a contravention of a particular law; or
- Metrics or one of its officers or employees has engaged in conduct that:
    - constitutes an offence against, or a contravention of any law of the Commonwealth, or any State or Territory (punishable by imprisonment of 12 months or more) or, as applicable, New Zealand;1 or
    - represents a danger to the public or the financial system.

Disclosable Conduct does not necessarily involve a contravention of a law. For example, '*misconduct or an improper state of affairs or circumstances*' could involve conduct that, whilst not unlawful, indicates a systemic issue of concern that one of our regulators should know about to properly perform its functions. It may also relate to business behaviour and practices that may cause consumer or investor harm. Also, information that indicates a significant risk to public safety or the stability of, or confidence in, the financial system is Disclosable Conduct, even if it does not involve a breach of a particular law.

Further examples of Disclosable Conduct include:

- dishonest, fraudulent or other unethical conduct in breach of Metrics Code of Conduct.
- unsafe work-practices.
- illegal conduct, such as theft, dealing in, or use of illicit drugs, violence or threatened violence, and criminal damage against property.
- fraudulent activity including money laundering or misappropriation of funds.
- serious, unlawful, corrupt or irregular use of funds or other resources.

[1] For example: the Corporations Act 2001 (Cth); Australian Securities and Investments Commission Act 2001 (Cth); Financial Sector (Collection of Data) Act 2001; Superannuation Industry (Supervision) Act 1993; National Consumer Credit Protection Act 2009; and any instrument made under these Acts.

- improper accounting or financial reporting practices.
- actions threatening the environment and or health and safety of others.
- failure to comply with, or breach of, legal or regulatory requirements.
- offering or accepting a bribe; and
- engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made, or to be planning to make, a protected disclosure.
- a 'disclosable matter' under s1317AA of the Corporations Act.
- a deliberate concealment of any conduct noted above.
- in the case of NZ Employees, an additional "serious wrongdoing" as defined in section 10 of the NZ Whistleblowers Act, not referred to above.

When reporting Disclosable Conduct a Whistleblower must have reasonable grounds to suspect the information being disclosed is true to be eligible for protection. A disclosure will still qualify for protection if information in respect of the Disclosable Conduct turns out to be incorrect, provided the Whistleblower had reasonable grounds to suspect the information was true.

# 4 What is not Disclosable Conduct?

Disclosures that are not about a Disclosable Conduct are not covered by this policy and do not qualify for protection under the Whistleblower Protection Scheme or NZ Whistleblowers Act. However, such disclosures may be protected under other legislation, such as in Australia the *Fair Work Act 2009* (Cth) (for example, personal work-related grievances).

## 4.1 Deliberate False Reports

Metrics will treat all reports of disclosable matters seriously and endeavour to protect anyone who raises concern in line with this policy. A Whistleblower can still qualify for protection under this policy where their disclosure turns out to be incorrect.

However, deliberately false or vexatious reports will not be tolerated. A deliberately false or vexatious report could have a significant effect on the reputation of Metrics and its personnel. Deliberately false or vexatious reporting will be treated as a serious disciplinary matter. Whilst not intending to discourage the reporting of matters of genuine concern, whistleblowers must

ensure that, as far as possible, reports are factually accurate, based on first-hand knowledge, presented in an unbiased fashion (and any possible perception of bias should be disclosed) and without material omission.

## 4.2 Personal Work-Related Grievances

Disclosable Conduct does not include conduct relating to personal work-related grievances and such matters may be dealt with pursuant to one or more of the following policies (as applicable):

- Employee Complaints and Grievance – HR Policy.
- Anti-discrimination, Bullying and Harassment Policy.
- Diversity & Inclusion Policy; or
- Health and Safety Policy.

Personal work-related grievances are those that relate to the discloser's current or former employment and have or tend to, have implications for the discloser personally but do not have any other significant implications for Metrics and do not relate to any conduct or alleged conduct which might be Disclosable Conduct.

Examples of personal work-related grievances include:

- an interpersonal conflict between the Whistleblower and another employee.
- A decision that does not involve a breach of workplace laws.
- a decision relating to the engagement, transfer or promotion of the Whistleblower.
- a decision relating to the terms and conditions of engagement of the Whistleblower; or
- a decision to suspend or terminate the employment of the discloser, or otherwise to discipline the Whistleblower.

However, personal work-related grievances may qualify for protection in certain circumstances, such as:

- where the disclosure also includes information that is a disclosable matter (i.e. a mixed report).
- where the disclosure reasonably indicates a breach of employment or other Commonwealth laws punishable by imprisonment for a period of 12 months or more.

- where a discloser seeks legal advice or representation about the operation of the whistleblower protections under the Corporations Act 2001 - that communication with lawyers is protected; or
- where the discloser suffers from or is threatened with detriment for making a disclosure, whether or not the disclosure is actually a protected disclosure - the discloser is entitled to protection against detriment.

Disclosures that are not about Disclosable Conduct do not qualify for protection under the Whistleblower Protection Scheme or the NZ Whistleblowers Act (as applicable) or under this policy, although disclosures may be protected under other legislation such as the Fair Work Act 2009 (in Australia).

# 5 Reporting Disclosable Conduct

## 5.1 Eligible Recipients

In order to qualify for protection under the Whistleblower Protection Scheme or the NZ Whistleblowers Act (as applicable) under this policy, a disclosure by a Whistleblower of information concerning Disclosable Conduct must only be made in accordance with this policy and to an Eligible Recipient (identified below).

Disclosures may be made on an **open or anonymous basis** to benefit from protection. A Whistleblower's disclosure qualifies for protection from the time it is made to an Eligible Recipient, regardless of whether the Whistleblower or the recipient recognises that the disclosure qualifies for protection at that time.

Metrics anticipates that information in respect of Disclosable Conduct reported under this policy will be most efficiently dealt with internally.

Whistleblowers are encouraged report information concerning Disclosable Conduct to the Chief Compliance Officer. If the Disclosable Conduct relates to the either of these officers, the report can be made to any of the Managing Partners.

Metrics notes for completeness that concerns can also be reported in person, by phone, by email or otherwise in writing to any of the following Eligible Recipients:

- officers, Board directors and senior managers of Metrics;
- Metrics' auditors (or members of an audit team conducting an audit); or
- our Tax Agent or BAS Agent in relation to tax affairs,

(each an '**Eligible Recipient**').

Reports of Disclosable Conduct may also be protected when made to ASIC, and the Commissioner of Taxation, or if applicable an **appropriate authority** as defined in the NZ Whistleblowers Act, regardless of whether such reports are first made as set out above.

In more specific and limited circumstances where a matter of public interest in Australia is concerned, a report may be protected if made to a journalist or a member of Parliament, but only if the Whistleblower complies with the following strict requirements:

- disclosure must have previously been made to ASIC, or a prescribed body; and
- written notice must have been provided to the body to which the disclosure was made.
- at least 90 days must have passed since the qualifying disclosure was made.
- the Whistleblower does not have reasonable grounds to believe that action is being, or has been, taken to address the matters to which the qualifying disclosure is related.
- the Whistleblower has reasonable grounds to believe that making a public interest disclosure would be in the public interest.
- after 90 days have passed, the Whistleblower must give the body to which the qualifying disclosure was originally made, a written notification that:
    - includes sufficient information to identify the qualifying disclosure; and
    - states that the Whistleblower intends to make a public interest disclosure; and
- the extent of the information disclosed in the public interest is no greater than to inform the journalist or member of Parliament of the misconduct or improper state of affairs or circumstances, or other conduct falling within the scope of the Whistleblower Protection Scheme or NZ Whistleblowers Act (as applicable).

In more specific and limited circumstances where a matter of emergency in Australia is concerned, a report may be protected if made to a journalist or a member of Parliament, but only if the Whistleblower complies with the following strict requirements:

- disclosure must have previously been made to ASIC, or a prescribed body; and
- the Whistleblower has reasonable grounds to believe that information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment.
- the Whistleblower must give the body to which the qualifying disclosure was originally made, a notification that:
    - they intend to make an emergency disclosure; and
    - includes sufficient information to identify the qualifying disclosure; and
- the extent of the information disclosed in the emergency disclosure is no greater than necessary to inform the journalist or member of Parliament of the substantial and imminent danger.

It is important for any Whistleblower to understand the criteria for making a public interest or emergency disclosure and they should contact an independent legal adviser before doing so.

A Whistleblower also qualifies for protection if information in respect of Disclosable Conduct is disclosed to a legal practitioner for the purposes of obtaining legal advice or legal representation about whistleblower protections.

## 5.2 Scope of Reporting

In order for Whistleblower report to be fully and properly investigated, a Whistleblower should try to provide as much information as possible to assist an investigation. A Whistleblower reporting Disclosable Conduct should look to provide the following information:

- Full details of the Disclosable Conduct.
- name of entity and/or persons involved.
- dates, locations.
- possible witnesses to the Disclosable Conduct; and
- any evidence that substantiates the Disclosable Conduct (documents, emails, messages, photographs etc).

Whistleblowers may be asked for consent regarding sharing your details and the information provided. Personal details will be treated with the strictest confidence.

## 5.3 Anonymous Reporting

A Whistleblower may:

- choose to remain anonymous in reporting Disclosable Conduct, over the course of the investigation and after an investigation is finalised.
- refuse to answer any questions that they feel could reveal their identity at any time, including during follow up conversation.

However, whistleblowers are encouraged to provide their identity because it will make it easier for Metrics to fully investigate and address the disclosure (for example, the context in which the Disclosable Conduct was observed is likely to be useful and the Eligible Recipient may seek more information to assist an investigation).

Metrics will assess anonymous disclosures in the same way as open disclosures, and any investigation will be conducted as best as possible in the circumstances.

Please be aware, an investigation may not be possible unless there is sufficient information. For this reason, a Whistleblower who wishes to remain anonymous should ideally maintain ongoing two-way communication (through an anonymous channel) with the Eligible Recipient to facilitate follow-up questions and feedback as well as support, if necessary.

# 6 Whistleblower Protections

Metrics views all reports of Disclosable Conduct seriously and is committed to the protection of Whistleblowers against action taken in reprisal for reporting Disclosable Conduct. The protections set out here apply not only to internal disclosures, but to disclosures to legal practitioners, regulatory and other external bodies, and public interest and emergency disclosures that are made in accordance with the Whistleblower Protection Scheme or the NZ Whistleblowers Act.

Civil and criminal sanctions also apply for breaches of these protections.

## 6.1 Confidentiality

Strict confidentiality obligations apply in respect of any disclosures that qualify for protection under the Whistleblower Protection Scheme and the NZ Whistleblowers Act.

It is illegal for Metrics or any Metrics personnel to disclose the identity of a Whistleblower or information that is likely to lead to the identification of the disclosure (which it has obtained directly or indirectly because the Whistleblower

made a disclosure that qualifies for protection) unless the Whistleblower consents to the disclosure.

If a Whistleblower does not consent to their identity being disclosed, in Australia, it will still be lawful to disclose their identity to:

- ASIC, APRA, the AFP or the Commissioner of Taxation (in relation to tax matters);
- a legal practitioner for the purposes of obtaining legal advice or legal representation about the disclosure; or
- to a body prescribed by the Corporations Regulations

In New Zealand a Whistleblowers identity may be disclosed to a regulatory agency or a law enforcement agency for investigation pursuant to section 17 of the Protected Disclosure (Protection of Whistleblowers) Act 2022.

ASIC, APRA or the AFP can disclose the identity of a Whistleblower, or information that is likely to lead to the identification of the Whistleblower, to a Commonwealth, State or Territory authority to help the authority in the performance of its functions or duties.

Metrics (and any Metrics personnel) may otherwise disclose information contained in any report in respect of Disclosable Conduct if it is reasonably necessary for investigating the issues raised in the report.

To reduce the risk that the Whistleblower will be identified from the information contained in a report, unless the Whistleblower consents:

- all personal information or reference to the discloser witnessing an event will be redacted.
- the Whistleblower will be referred to in a gender-neutral context.
- where possible, the Whistleblower will be contacted to help identify certain aspects of their disclosure that could inadvertently identify them; and
- disclosures will be handled and investigated by qualified staff.

In addition:

- all paper and electronic documents and other materials relating to disclosures will be stored securely.
- access to all information relating to a disclosure will be limited to those directly involved in managing and investigating the disclosure.
- only a restricted number of people who are directly involved in handling and investigating a disclosure will be made aware of a

discloser's identity (subject to the discloser's consent) or information that is likely to lead to the identification of the discloser.

- communications and documents relating to the investigation of a disclosure will not to be sent to an email address or to a printer that can be accessed by other staff; and
- each person who is involved in handling and investigating a disclosure will be reminded about the confidentiality requirements, including that an unauthorised disclosure of a discloser's identity may be a criminal offence.

A Whistleblower should be aware that people may be able to guess their identity if:

- they have previously mentioned to other people that they are considering making a disclosure.
- they are one of a very small number of people with access to the information; or
- the disclosure relates to information that they have previously been told privately and in confidence.

A Whistleblower may lodge a complaint with Metrics in respect of a breach of confidentiality. A Whistleblower may also lodge a complaint for investigation by a regulator such as ASIC or the ATO.

## 6.2 Detrimental Acts or Omission

Metrics and any Metrics personnel may not engage in conduct that causes or threatens (express or implied, conditional or unconditional, and whether or not the Whistleblower fears that the threat will be carried out) to cause detriment to a Whistleblower if:

- it believes or suspects that the discloser (or another person) made, may have made, proposes to make or could make a disclosure that qualifies for protection; and
- the belief or suspicion is the reason, or part of the reason, for the conduct.

Detrimental conduct includes but is not limited to:

- dismissal.
- injury in his or her employment.
- alteration of position or duties to the disadvantage of the Whistleblower.

- discrimination between the Whistleblower and other employees of Metrics.
- harassment or intimidation.
- harm or injury, including psychological harm.
- property damage.
- reputational damage.
- damage to a person's business or financial position; or
- any other personal damage.

Detrimental conduct will not include:

- administrative action that is reasonable for the purpose of protecting a Whistleblower from detriment (e.g. moving a discloser who has made a disclosure about their immediate work area to another office to prevent them from detriment); and
- managing a Whistleblower's unsatisfactory work performance, if the action is in line with Metrics' performance management framework.

Metrics may apply one or more of the following measures and mechanisms for protecting Whistleblowers from detrimental acts or omissions (where appropriate):

- conduct an assessment of the risk of detriment against a Whistleblower and other persons (e.g. other staff who might be suspected to have made a disclosure), which will commence as soon as possible after receiving a disclosure.
- arrange for the availability of support services (including counselling or other professional or legal services).
- consider, apply and review strategies to help a Whistleblower minimise and manage stress, time or performance impacts, or other challenges resulting from the disclosure or its investigation.
- consider the Whistleblower performing their duties from another location, reassign the Whistleblower another role at the same level, make other modifications to the Whistleblower's workplace or the way they perform their work duties, or reassign or relocate other staff involved in the Disclosable Conduct.
- ensure that management are aware of their responsibilities to maintain the confidentiality of a disclosure, address the risks of isolation or harassment, manage conflicts, and ensure fairness when managing the

performance of, or taking other management action relating to, a discloser.

- interventions for protecting a discloser if detriment has already occurred—for example, Metrics may investigate and address the detrimental conduct, such as by taking disciplinary action, or allow the discloser to take extended leave, develop a career development plan for the discloser that includes new training and career opportunities, or offer compensation or other remedies.

A Whistleblower may be subject to disciplinary action if, in the course of investigating a disclosure, Metrics determines that the Whistleblower was complicit in the misconduct or improper state of affairs or has otherwise acted in an improper way.

A Whistleblower may lodge a complaint in accordance with this policy if they have suffered detriment. Any complaint will be investigated as a separate matter by a Metrics' officer or employee who is not involved in dealing with disclosures and the investigation findings will be provided to the Board or audit or risk committee.

A Whistleblower may seek independent legal advice or contact regulatory bodies, such as ASIC or the ATO (in Australia), if they believe they have suffered detriment.

## 6.3 Compensation and other Remedies

A Whistleblower may be eligible to seek compensation and other remedies through the courts if:

- they suffer loss, damage or injury because of a disclosure; and
- Metrics failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

Whistleblowers are encouraged to seek independent legal advice in this regard.

In Australia, disclosures may also amount to the exercise of a workplace right by an employee or contractor. Metrics and its employees are prohibited under the *Fair Work Act 2009* (Cth) from taking adverse action against employees or contractors because they exercised or propose to exercise any workplace rights.

## 6.4 Civil, Criminal and Administrative Liability Protection

A Whistleblower is protected from any of the following in respect of disclosure of Disclosable Conduct:

- civil liability (e.g. any legal action against the discloser for breach of an employment contract, duty of confidentiality or another contractual obligation);
- criminal liability (e.g. attempted prosecution of the discloser for unlawfully releasing information, or other use of the disclosure against the discloser in a prosecution (other than for making a false disclosure)); and
- administrative liability (e.g. disciplinary action for making the disclosure).

The above protections do not grant immunity for any misconduct a Whistleblower has engaged in that is revealed in their disclosure. However, in some circumstances, an admission may be a mitigating factor when considering administrative disciplinary or other action.

# 7 Investigation process

## 7.1 Handling a Disclosure

All Disclosable Conduct disclosures made under this policy will be received and treated sensitively and seriously, and will be dealt with promptly, fairly, independently and without bias. Metrics' response to a disclosure will vary depending on the nature of the disclosure (including the amount of information provided).

Following receipt of a disclosure of information in respect of Disclosable Conduct, Metrics will acknowledge receipt (within 20 days) and will then need to assess each disclosure to determine whether:

- it qualifies for protection under the Whistleblower Protection Scheme and NZ Whistleblowers Act, as applicable; and
- a formal, in-depth investigation is required – and if so, how that investigation should be carried out.

Generally, if an investigation is required, Metrics will determine:

- the nature and scope of the investigation.
- who should lead the investigation – including whether an external investigation is appropriate.
- the nature of any technical, financial or legal advice that may be required to support the investigation; and

- the anticipated timeframe for the investigation. Each investigation will be different which will impact the applicable timeframe. However, Metrics' intent is to complete an investigation as soon as practicable.

A disclosure may be addressed and resolved through formal investigation or informally (e.g. by assisting people to change their behaviours). If allegations are serious, Metrics may involve outside investigators and pass on information about the Disclosed Conduct or refer the disclosure to an appropriate authority in accordance with the terms of this policy.

The method for documenting and reporting the findings of the investigation of Disclosable Conduct will depend on the nature of the disclosure.

In circumstances where it may be unclear whether a disclosure qualifies for protection, Metrics may elect to treat the discloser as though they were protected as a whistleblower under the Whistleblower Protection Scheme or New Zealand Act (or the Taxation Administration Act, where relevant) and accordingly under this policy.

Where practicable, Metrics will keep the Whistleblower informed of the steps taken or to be taken (or if no action is to be taken, the reason for this), and provide appropriate updates, including about the completion of any investigation. However, the extent of the information provided, or whether it will be provided at all, will be subject to applicable confidentiality considerations, legal obligations and other factors Metrics considers relevant in the particular situation.

Metrics may not be able to undertake an investigation, or provide information about the process etc, if it is not able to contact the Whistleblower, for example, if a disclosure is made anonymously and a means of contact has not been provided.

Where practicable, Whistleblowers will receive updates about when the investigation has begun, while the investigation is in progress and after the investigation has been finalised. The frequency and timeframe of any updates may vary depending on the nature of the disclosure. Metrics will also have regard to confidentiality considerations when providing updates.

## 7.2 Communication with Whistleblower

A Whistleblower may be told how Metrics has decided to respond, including if an investigation will be conducted and its outcome. However, it may not always be appropriate to provide this information, and it may not be possible if a Whistleblower’s contact details have not been provided.

## 7.3 Fair Treatment

Metrics will ensure fair treatment of any employees who are mentioned in a disclosure of Disclosable Conduct, including those who are the subject of the disclosure.

Metrics will apply the following measures and mechanisms for protecting Whistleblowers and for ensuring fair treatment of individuals mentioned in a disclosure (where applicable):

- disclosures will be handled confidentially, when it is practical and appropriate in the circumstances.
- each disclosure will be assessed and may be the subject of an investigation.
- when an investigation needs to be undertaken, the process will be objective, fair and independent with the objective of determining whether there is enough evidence to substantiate or refute the matters disclosed.
- an employee who is the subject of a disclosure will be advised about the subject matter of the disclosure as and when required by principles of natural justice and procedural fairness and prior to making any adverse finding against them.
- an employee who is the subject of a disclosure may contact Metrics' support services (e.g. counselling); and
- an employee who is the subject of a disclosure may (where appropriate) perform their duties from another location or be reassigned to another role of the same level or have other modifications made to the workplace or the way they perform their duties.

Metrics may also consider a range of other matters to protect a Whistleblower from the risk of suffering detriment and to ensure fair treatment of individuals mentioned in a disclosure. Steps it will take to help achieve this may include:

- assessing whether anyone may have a motive to cause detriment – information could be gathered from a Whistleblower about:
    - the risk of their identity becoming known.
    - who they fear might cause detriment to them.
    - whether there are any existing conflicts or problems in the workplace; and
    - whether there have already been threats to cause detriment.

- analysing and evaluating the likelihood of each risk and evaluating the severity of the consequences.
- developing and implementing strategies to prevent or contain the risks – for anonymous disclosures, it may be worthwhile assessing whether the discloser's identity can be readily identified or may become apparent during an investigation; and
- monitoring and reassessing the risk of detriment where required – the risk of detriment may increase or change as an investigation progresses, and even after an investigation is finalised.

Where an investigation identifies a breach of Metrics' Code of Conduct or internal policies or procedures, appropriate disciplinary action may be taken. This may include but is not limited to terminating or suspending the employment or engagement of the person(s) involved in the Disclosable Conduct.

If the disclosure mentions or relates to employees of Metrics (other than the Whistleblower) Metrics will endeavour to take steps to ensure that those individuals are treated fairly. Typically, this would include giving those persons an opportunity to respond to the subject matter of the disclosure having regard to principles of procedural fairness. In addition, action would only be taken against such a person if there is cogent evidence of wrongdoing.

# 8 Reporting

The Chief Compliance Officer will report regularly to the Board on Whistleblower matters and ongoing investigations, to the extent they are able to do so.

# 9 Support

Metrics personnel may choose to contact Metrics' Employee Assistance Program (EAP) for confidential support and counselling at any time. Refer to Health and Safety Policy.

Whistleblowers may also request additional support from the Chief Compliance Officer if required.

# 10 Compliance with this Policy

All suspected breaches of this policy will be investigated by Metrics. If these investigations reveal material breaches, appropriate disciplinary and remedial action will be taken. Depending on the nature of the breach, this will range from

providing training, coaching and counselling through to formal warnings and/or termination of your employment.

Metrics reserves the right to inform the appropriate authorities where it is considered that there has been criminal activity or an apparent breach of the law.

In addition, significant civil and criminal penalties for any company or individual (including any Metrics' personnel) disclosing a Whistleblower's identity or victimising a Whistleblower apply.

## 11 Review of this Policy

Metrics will review this policy every year.

This policy may be amended from time to time at the discretion of Metrics.

| Version | Review | Description of Changes | Date approved | Approver |
|---|---|---|---|---|
| 0.1 | 01/09/24 | Draft content | 01/02/25 | (AL) Chief Executive Officer |
| 0.2 | 01/05/25 | Styling and formatting | 15/05/25 | (DL) Chief Compliance Officer |
| 1.0 | 01/06/25 | Content and version update | 18/06/25 | Metrics Group Board |
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