

Inspiring community

Activity



WHISTLEBLOWER POLICY

Whistleblower Policy

1 Purpose

1.1 We are committed to a culture of integrity, transparency and accountability.

1.2 We encourage you to report a Disclosable Matter (as defined below) according to this policy and the Whistleblower Policy Guidelines (Guidelines) and to adopt the attitude 'when in doubt, report'. We are committed to identifying and responding to each Disclosable Matter and supporting anyone who decides to report.

1.3 We take all reports seriously, so it is important that you do not make reports which you know to be untrue.

2 Scope

2.1 This policy applies to you if you are any of the following:

(a) a current, or former, employee or officer of BlueFit (including permanent, parttime, fixed term or temporary, interns, secondees, managers, and directors);

(b) a supplier of services or goods to BlueFit (whether paid or unpaid), including their employees (for example, current and former contractors, consultants, service providers and business partners);

(c) an associate of BlueFit (for example, a director, secretary or a related body corporate of BlueFit); or

(d) a relative, dependant or spouse of an individual described in the above paragraphs (for example, relatives, dependants or spouse of current and former employees, contractors, consultants, service providers, suppliers and business partners).

3

What is a Disclosable Matter?

3.1. A Disclosable Matter is information which you have reasonable grounds to suspect concerns misconduct, or an improper state of affairs or circumstances, in relation to BlueFit's business (including in relation to an officer or employee of BlueFit).

3.2. By way of example only, a Disclosable Matter may include conduct that:

(a) is fraudulent or unsafe;

(b) involves irregular use of company funds or practices (including misleading accounting or financial reporting practices);

(c) is impeding internal controls, or internal or external audit processes;

(d) involves misuse of our business information;

(e) seriously endangers the health and safety of any employee or member of the public.

3.3. Disclosures that are not about a Disclosable Matter do not qualify for protection under this policy or the Corporations Act.

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This policy does not apply to certain matters

4.1. This policy does not cover personal work-related grievances – issues that affect only you personally and do not have broader implications for BlueFit. These may include interpersonal conflicts, employment decisions, or disciplinary actions.

4.2. However, such grievances may still be protected if they involve broader misconduct, breaches of whistleblower protections, or relate to systemic issues.

5 How to make a report

5.1. You should report a Disclosable Matter as practically soon after you become aware of it and make your report to an Eligible Recipient.

5.2. Further information regarding how to report a Disclosable Matter and who Eligible Recipients are can be found in the Guidelines.

6 Public interest or emergency disclosure

6.1. You must not report a Disclosable Matter to a member of parliament or a journalist unless it is a public interest disclosure or an emergency disclosure. Further information about how to make a Public Interest disclosure and emergency disclosure can be found in the Guidelines.

7 Handling and investigation a report of a Disclosable Matter

7.1. BlueFit will assess your report to determine whether it qualifies for protection as a Disclosable Matter, and what the appropriate response to the report will be. Further information regarding the handling and investigation of a report of a Disclosable Matter, can be found in the Guidelines.

8 What protections will a whistleblower receive?

8.1. We are committed to protecting and supporting whistleblowers who report a Disclosable Matter according to this policy. For further information regarding the protections available to a whistleblower, please see the Guidelines.

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Protection from detrimental acts or omissions

9.1. If you report a Disclosable Matter under this policy, you are protected by law from any form of detriment in relation to your report. For further information regarding protection from detrimental acts or omissions, please see the Guidelines.

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Compensation and other remedies

10.1. For information regarding compensation and other remedies that may be available to you, please see the Guidelines.

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Civil, criminal and administrative liability protection

11.1 For information regarding protection from civil, criminal and administrative liability, please see the Whistleblower Policy Guidelines.

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Ensuring fair treatment of individuals mentioned in a disclosure

12.1. For information regarding the steps BlueFit will take to ensure individuals mentioned in disclosures are treated fairly, please see the Guidelines.

13 Evaluation and review

13.1. The Board is responsible for monitoring, reporting and reviewing this policy.

In this policy:

AFCA means Australian Financial Complaints Authority.

AFP means the Australia Federal Police as defined in the Australian Federal Police Act 1979 (Cth).

BlueFit means BlueFit Pty Ltd (ACN 127 508 230) and its related entities.

APRA means the Australian Prudential Regulation Authority.

ASIC means the Australian Securities and Investments Commission.

Associate means associate as defined in section 11 of the Corporations Act, as:

If the primary person is a body corporate, the associate reference includes a reference to:

- (a) a director or secretary of the body; and
- (b) a related body corporate; and
- (c) a director or secretary of a related body corporate

Board means the Board of Directors of BlueFit.

Corporations Act means the Corporations Act 2001 (Cth).

14 Definitions

Disclosable Matter includes conduct:

- which you have reasonable grounds to suspect was engaged in by an entity or person named in paragraph 3.1 of the Policy, and which:
 - ~ breaches the Corporations Act, the Australian Securities and Investments Commission Act 2001 (Cth), the Banking Act 1959 (Cth), the Financial Sector (Data Collection) Act 2001 (Cth), the Insurance Act 1973 (Cth), the Life Insurance Act 1995 (Cth), the National Consumer Credit Protection Act 2009 (Cth), or the Superannuation Industry (Supervision) Act 1993 (Cth);
 - ~ is an offence against any other law of the Commonwealth of Australia that is punishable by imprisonment for a period of 12 months or more; or
 - ~ indicates a significant risk to public safety or the stability of, or confidence in, the financial system (even if it does not involve a breach of a particular law); and
- that may not involve contravention of a particular law.

Eligible Recipient means a person referred to in clause 1.2 of the Guidelines.

Whistleblower Protections Officer means a person who has responsibility for managing a whistleblower disclosure made to an Eligible Recipient.

14

Definitions

