



JUA Underwriting Agency Pty Ltd

Whistleblower Policy

OVERVIEW

At JUA Underwriting Agency (“the Company”) we are committed to our company values. These values are the foundation of how we conduct ourselves and interact with each other, our clients and other stakeholders. The company is committed to ensuring corporate compliance and promoting ethical corporate culture by observing the highest standards of fair dealing, honesty and integrity in our business activities.

PURPOSE

The Company encourages the reporting of any instances of suspected unethical, illegal, corrupt, fraudulent or undesirable conduct involving the Company’s business and provides protections and measures to individuals who make a disclosure in relation to such conduct without fear of victimisation or reprisal.

This policy will be made available on the Company website and in any other ways that will ensure that it is made available to persons to whom this policy applies.

SCOPE

This policy applies to any person who is, or has been, any of the following with respect to the Company:

- Employee;
- Officer;
- Director;
- Contractor (including sub-contractors and employees of contractors);
- Supplier (including employees of suppliers);
- Consultant;
- Auditor;
- Associate; and
- Relative, dependant, spouse, or dependant of a spouse of any of the above.

REPORTABLE CONDUCT

You may make a report or disclosure under this policy if you have reasonable grounds to believe that a Company director, officer, employee, contractor, supplier, consultant or other person who has business dealings with the Company, has engaged in conduct (‘Reportable Conduct’) which is:

- Dishonest, fraudulent or corrupt;



- Illegal (such as theft, violence or threatened violence or criminal damage to property);
- Unethical, including any breach of the Company's policies; Oppressive or grossly negligent;
- Potentially damaging to the Company, its employees or a third party;
- Misconduct or an improper state of affairs;
- A danger, or represents a danger to the public or financial system;
- Harassment

For the avoidance of doubt, Reportable Conduct does not include personal work-related grievances. These grievances should be reported to your manager. A personal work-related grievance is a grievance about any matter in relation to a staff member's current or former employment, having implications (or tending to have implications) for that person personally and that do not have broader implications for the Company.

Example of personal work-related grievances are as follows:

- An interpersonal conflict between the staff member and another employee;
- A decision relating to the engagement, transfer or promotion of the staff member;
- A decision relating to the terms and conditions of engagement of the staff member;
- A decision to suspend or terminate the engagement of the staff member, or otherwise to discipline the staff member.

MAKING A DISCLOSURE

The Company relies on its employees maintaining a culture of honest and ethical behaviour. Accordingly, if you become aware of any Reportable Conduct, it is expected that you will make a disclosure under this policy.

Disclosing any issue or behaviour which you consider to be Reportable Conduct can be done via the Whistleblower Officers listed below:

Responsible Officers

Whistleblower Officer

Name : Simon Thorn
Phone Number : (02) 8272 4808
Email Address : sthorn@jua.com.au

GM Finance

Name : Marty Lindsay
Phone Number : (02) 8272 4848
Email Address : mlindsay@jua.com.au

If you are unable to use any of the above reporting channels, a disclosure can be made to an "eligible recipient" within the Company. Eligible recipients include Company Directors and Auditors or member of an audit team conducting an audit of the Company.



Individuals may choose to make a disclosure to an external or regulatory body such as the Australian Securities and Investments Commission (ASIC) or the Australian Prudential Regulation Authority (APRA). You will be covered by the protections and measures afforded to you by the Company under this policy if you report your concerns to any external or regulatory body.

Anonymity

When making a disclosure, you may do so anonymously. It may be difficult for the Company to properly investigate matters disclosed if a report is submitted anonymously and therefore the Company encourages you to share your identity when making a disclosure, however you are not required to do so.

Reporting to a Legal Practitioner

You may choose to discuss your concerns with a legal practitioner for the purposes of obtaining legal advice or representation. You will be covered by the protections and measures afforded to you by the Company under this policy if you report your concerns to a legal practitioner.

Public Interest and Emergency Disclosure

In certain situations, the conduct or wrongdoing may be of such gravity and urgency that disclosure to the media or parliamentarian is necessary. A public interest and emergency disclosure can only be made to :

- A journalist, defined to mean a person who is working in a professional capacity as a journalist for a newspaper, magazine, or radio or television broadcasting service, including digital and online mediums; or
- A member of the Parliament of the Commonwealth or of a State or Territory parliament. You may only make a public interest and emergency disclosure if:
 - You have previously disclosed the information to ASIC or APRA;
 - At least 90 days from the previous disclosure was made;
 - You have reasonable grounds to believe that action is not being taken to address the matters which you have disclosed;
 - You have reasonable grounds to believe that by making a further disclosure to a journalist or member of parliament would be in the public interest;
 - You have given written notification, including sufficient information to identify the previous disclosure to the authority to which the previous disclosure was made that you intend on making a public interest disclosure; and
 - No more information is disclosed than is reasonably necessary to inform the recipient of the substantial and imminent danger.



INVESTIGATION

The Company will investigate all matters reported under this policy as soon as practicable after the matter has been reported. The Whistleblower Officer will investigate the matter and where necessary, appoint an external investigator to assist in conducting the investigation. All investigations will be conducted in a fair, independent and timely manner and all reasonable efforts will be made to preserve confidentiality during the investigation.

If the reporting is not anonymous, the Whistleblower Officer or external investigator will contact you to discuss the investigation process and any other matters that are relevant to the investigation.

Where you have chosen to remain anonymous, your identity will not be disclosed in investigations, and the Company will conduct the investigation based on the information provided to it.

Where possible you will be provided with feedback on the progress and expected timeframes of the investigation. The person against whom the allegations have been made will also be informed of the concerns and will be provided with an opportunity to respond (unless there are any restrictions or other reasonable bases for not doing so).

To the extent permitted by law, the Company may inform you and/or a person against whom allegations have been made of the findings. Any report will remain the property of the Company and will not be shared with you or any person against whom the allegations have been made.

PROTECTION OF WHISTLEBLOWERS

The Company is committed to ensuring that any person who makes a disclosure is treated fairly and does not suffer detriment and that confidentiality is preserved in respect of all matters raised under this policy.

Protection from Legal Action

You will not be subject to any civil, criminal or administrative legal action (including disciplinary action) for making a disclosure under this policy or participating in any investigation. Any information you provide will not be admissible in any criminal or civil proceedings other than for proceedings in respect of the falsity of the information.

Protection against Detrimental Conduct

The Company (or any person engaged by the Company) will not engage in “Detrimental Conduct” against you if you have made a disclosure under this policy.

Detrimental Conduct includes actual or threatened conduct such as the following (without limitation):

Termination of employment;

- Injury to employment including demotion or disciplinary action;
- Alternation of position or duties;



- Discrimination;
- Harassment, bullying or intimidation;
- Victimisation;
- Harm or injury including psychological harm;
- Damage to person's property or reputation;
- Damage to a person's business or financial position, or any other damage to a person.

The company will take all reasonable steps to protect you from Detrimental Conduct and will take necessary action where such conduct is identified.

The Company also strictly prohibits all forms of Detrimental Conduct against any person who is involved in an investigation of a matter disclosed under the policy in response to their involvement in that investigation.

If you are subjected to Detrimental Conduct as a result of making a disclosure under this policy or participating in an investigation, you should inform a Whistleblower Officer or eligible participant in accordance with the reporting guidelines outlined above.

Protection of Confidentiality

All information received from you will be treated confidentially and sensitively.

If you make a disclosure under this policy, your identity (or any information which would be likely to identify you) will only be shared if:

- You give your consent to share that information; or
- The disclosure is allowed or required by law (for example where the concern is raised with a legal practitioner for the purpose of obtaining legal advice);
- The concern is reported to ASIC or APRA, THE Australian Taxation Office (ATO) or the Australian Federal Police (AFP);
- Where it is necessary to disclose information for the effective investigation of the matter, and this is likely to lead to your identification, all reasonable steps will be taken to reduce the risk that you will be identified.

OTHER MATTERS

Any breach of this policy will be taken seriously and may result in disciplinary action, up to and including termination of employment.

In so far as this policy imposes any obligations on the Company, those obligations are non contractual and do not give rise to any contractual rights. To the extent that this policy describes benefits and entitlements for employees, they are discretionary in nature and are also not intended to be contractual.

The terms and conditions of employment that are intended to be contractual are set out in an employee's written employment contract.

The company may unilaterally introduce, vary, remove or replace this policy at any time.