

EXPERIENCECO

COMPANY:	Experience Co Limited and all Group Companies (the Company / Experience Co/ EXP / Group)
TITLE:	Whistle-Blower Policy
DEPARTMENT:	People + Performance

PURPOSE

Experience Co is committed to the highest standard of ethical practices and honest relationships and to the protection of individuals who report in good faith instances or allegations of wrongdoing.

Experience Co Directors and Management have adopted this policy to encourage reporting of any wrongdoing in good faith and in an environment free from victimisation so that the Board and Management can address any improper conduct.

COVERAGE

This policy applies to the Company's current and former employees, contractors, officers, directors and their associates, suppliers, professional service providers, employees of a supplier or a professional service provider and their associates, relatives and/or dependents (Whistleblower).

WHAT IS WRONGDOING?

Wrongdoing includes (but is not limited to) the following activities which may cause financial loss to EXP or may damage its reputation or otherwise may amount to serious improper conduct:

- A breach of laws or regulations;
- Dishonest, corrupt, fraudulent or other illegal or unethical conduct or activity;
- Is an unsafe work practice or conduct endangering health and safety;
- Represents a danger to the public;
- Conduct that is contrary to, or in breach of, Experience Co's Code of Conduct or any Company policy;
- Conduct involving substantial risk to the environment;
- A substantial mismanagement of Experience Co's resources; or
- Conduct that is detrimental to Experience Co's financial position or reputation.

It is a serious disciplinary offence to make allegations that prove to be unsubstantiated and/or made maliciously or known to be false.

This policy does not cover workplace grievances. Workplace grievances should be reported through your manager or supervisor.

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HOW DO I REPORT WRONGDOING?

At any time before you raise a concern, you can obtain more information about this policy, how it works and the legal protections available to you by contacting the General Manager, People and Performance or any of the officers listed below.

Any person who has reasonable grounds to suspect that any wrongdoing has occurred, can report such wrongdoing via the following channels:

1. Your direct Manager. Depending on the nature of the wrongdoing, any person is encouraged to first discuss their concern with their Manager. Alternatively, if the person does not feel comfortable speaking with their Manager, they can raise the concern with an officer or senior manager of the Company directly;

or
2. The Whistleblowing officer; by emailing the Whistleblower Officer on whistleblower@experienceco.com;

or
3. Anonymously; in writing for the attention of the Whistleblower Officer at PO Box 5361, Wollongong, NSW 2500 – marked as private and confidential.

WHISTLEBLOWER PROTECTIONS

The identity and information likely to lead to the identification of the Whistleblower will only be disclosed with the consent of the Whistleblower. Civil penalties apply to companies that do not protect the confidentiality of Whistleblowers.

Any person reporting wrongdoing either to their Manager or via the above channels can be assured that they will be protected and that the investigation will be conducted in accordance with the principles of fairness and justice. Any employees involved in the investigation must treat the matter confidentially and must not disclose the identity of the Whistleblower without their consent.

It is a breach of this policy and EXP forbids any employee from penalising any person who in good faith reports an instance or allegation of wrongdoing in accordance with this policy. This includes any reprimand, reprisal, change in work duties, change in employment amenities, change in reporting requirements, damage to career prospects or reputation, threats to do any of these or deliberate omissions which may damage the person.

This policy does not prevent any person from reporting wrongdoing to the Company's auditor or a regulator under any applicable law.

The Whistleblower may or may not wish to remain anonymous when making a report. However, Whistleblowers are encouraged to provide their identity to enable effective investigation of wrongdoing.

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INVESTIGATING WRONGDOING

Where applicable and if the identity of the Whistleblower is known, the Whistleblower officer will notify the Whistleblower and acknowledge receipt of a report of wrongdoing within 7 business days.

Investigations of allegations of wrongdoing will be conducted in a manner that is confidential, fair and objective.

The investigation processes will vary depending on the nature of the alleged wrongdoing and the amount of information provided. All reports will be promptly evaluated and investigated, although the seriousness and complexity of the concern may affect the time needed to investigate the matter.

Material incidents reported under this policy will be reported to the Company's Audit & Risk Committee.

BREACH

Adherence to this policy is a condition of employment, engagement and / or terms of contract at Experience Co. Breaches may be subject to disciplinary action including termination of employment or contract, as appropriate. If the report finds a suspected or confirmed breach of the law or regulations, the matter will be referred to the relevant legal authority.

REVIEW AND AVAILABILITY

This policy may be amended with the approval of the Board to ensure that it continues to comply with legislative changes and meets best practice standards.

A copy of this policy is available on the Company's website at www.experienceco.com.

Updated – February 2024