

Whistleblower Policy

1. Policy Statement

At ElectraNet we are guided by our values. These values are the foundation for how we behave and interact with each other, our customers, suppliers, shareholders and other stakeholders.

ElectraNet’s policies, such as the Code of Conduct and this Policy, align with our values and, in conjunction with an employee’s employment contract, seek to ensure we observe the highest standards of fair dealing, honesty and integrity in our business activities.

This Policy outlines the framework in which individuals can report concerns about wrongdoing in accordance with the whistleblowing regime in Australia under the *Corporations Act 2001* (Cth) and the *Taxation Administration Act 1953* (Cth).

More specifically, this Policy supports the reporting of concerns in circumstances where a person has reasonable grounds to suspect that ElectraNet (including its officers and employees) has engaged in **Reportable Conduct** without fear of reprisal and with the knowledge that it will be treated fairly and confidentially.

The amended whistleblowing regimes took effect from 1 July 2019 and will apply to new disclosures made on or after 1 July 2019, but may relate to conduct which occurred before 1 July 2019.

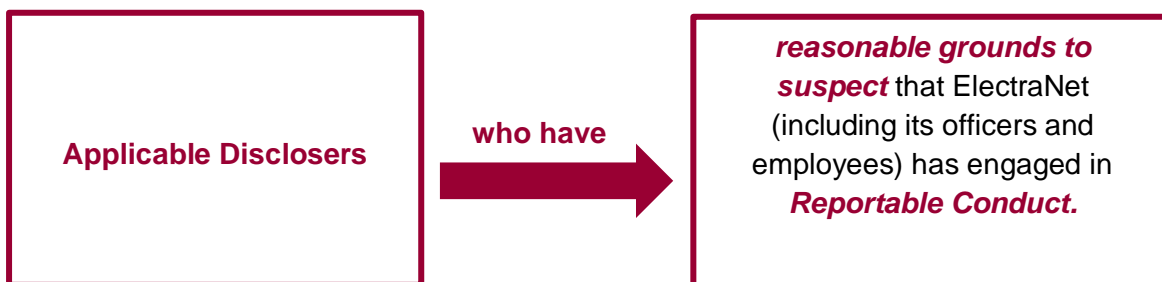
2. Purpose

This Policy sets out ElectraNet’s expectations where an Applicable Discloser **reasonably suspects** that ElectraNet (including its officers and employees) has engaged in **Reportable Conduct** by explaining:

- the individuals who constitute Applicable Disclosers under the Act;
- how, and to whom, Applicable Disclosers should report Reportable Conduct;
- the protections available to Applicable Disclosers who disclose Reportable Conduct and how ElectraNet will support Applicable Disclosers in making those reports; and
- how ElectraNet will investigate those reports, including how ElectraNet will ensure fair treatment of Applicable Disclosers and the persons the subject of the report, or to whom the report otherwise relates.

3. Scope

This Policy applies to:



4. Terms and Acronyms

Term/Acronym	Definition
Applicable Discloser	means any and all (past and present):employees; <ul style="list-style-type: none"> ▪ interns or secondees; ▪ contractors; ▪ consultants; ▪ suppliers or service providers, whether paid or unpaid (and their employees); ▪ associates, of ElectraNet; or ▪ a relative, spouse or dependant of one of those persons (or a dependant of the spouse of one of those persons, such as a stepchild).
Code of Conduct	means the ElectraNet Code of Conduct.
Confidential Information	has the meaning given to it in Clause 5.4.1.
Detrimental Conduct	means, but is not limited to: <ul style="list-style-type: none"> ▪ dismissal of an employee; ▪ injury of an employee in their employment; ▪ alteration of an employee's position or duties to their disadvantage; ▪ discrimination, harassment or intimidation; ▪ harm or injury to a person (including physical or psychological harm); and/or ▪ damage to reputation, property, business or financial position, or any other damage.
Eligible Recipient	has the meaning given to it in Clause 5.5.1.
Policy	means this Whistleblower Policy.
Reportable Conduct	has the meaning given to it in Clause 5.1.
Reportable Conduct Report	means a report made in accordance with this Policy by an Applicable Discloser who has reasonable grounds to suspect Reportable Conduct (or a report in relation to tax affairs made in accordance with Clause 5.5.1).
the Act	means the <i>Corporations Act 2001</i> (Cth) (or the <i>Taxation Administration Act 1953</i> (Cth), where relevant), each as amended by the <i>Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019</i> (Cth) and each as amended from time to time.
Whistleblower	means an Applicable Discloser who makes a Reportable Conduct Report who is subsequently determined to be a Whistleblower under the Act by the Executive, Legal Risk and Governance and/or the WIO in accordance with this Policy.
Whistleblower Report	means a Reportable Conduct Report determined to be a Whistleblower Report under the Act by the Executive, Legal Risk and Governance and/or the WIO.
WIO	Whistleblower Investigation Officer.
WPO	Whistleblower Protections Officer.

5. Policy Details

5.1 What is Reportable Conduct?

Under the Act, Reportable Conduct means conduct of ElectraNet (including its officers and employees) that:

- constitutes misconduct or an improper state of affairs or circumstances;

- constitutes an offence against, or a contravention of, a provision of a Commonwealth Act listed in Schedule 1 of this Policy;
- constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more; or
- represents a danger to the public or financial system.

See also Clause 5.5.1 below in relation to information and conduct regarding tax affairs.

5.1.1 Examples of Reportable Conduct

The Act defines “misconduct” to include matters such as fraud, negligence, default, breach of trust and breach of duty.

The term “an improper state of affairs or circumstances” under the Act is intentionally broad and, like “misconduct”, is not limited to unlawful conduct in relation to ElectraNet or its officers and employees – it may simply be a systemic issue which affects ElectraNet’s ability to properly perform its functions or which could cause harm to customers and other stakeholders.

With that in mind, examples of Reportable Conduct can include any conduct of ElectraNet (including its officers and employees) which is:

- dishonest;
- fraudulent;
- unlawful, corrupt or concerns the irregular use of company funds or practices;
- illegal (including theft, dealing in illicit drugs, violence or threatened violence or criminal damage to property);
- unethical, including a breach of the ElectraNet Code of Conduct, to the extent constituting “misconduct”, systemic impropriety or other conduct falling within Clause 5.1;
- improper or involves misleading accounting or financial reporting practices or tax affairs; or
- a danger, or represents a significant risk, to the public or financial system.

5.1.2 What are “Reasonable grounds to suspect” Reportable Conduct?

If an Applicable Discloser has reasonable grounds to suspect Reportable Conduct, their suspicion must be based on **fact**, not speculation.

The Applicable Discloser must have at least a **rational** and **objectively reasonable** suspicion of the Reportable Conduct, such that the occurrence of the Reportable Conduct is more than just a remote possibility.

In practice, a mere allegation with no supporting information is not likely to be considered as having reasonable grounds to suspect Reportable Conduct.

An Applicable Discloser’s motive or personal opinion of any person involved in the Reportable Conduct is not relevant and will not prevent them from obtaining protections under the Act and this Policy.

If, following investigation, a Reportable Conduct Report turns out to be unsubstantiated, the protections available to the Applicable Discloser will still apply provided that they had reasonable grounds to suspect Reportable Conduct.

5.2 Reports not covered by this Policy

5.2.1 Personal Grievances

The Act does not protect, and this Policy does not apply, to the reporting of **personal, work-related grievances** where the grievance:

- does *not* have significant implications for ElectraNet beyond the personal circumstances of the reporting person;
- does *not* concern Reportable Conduct; or
- does *not* concern Detrimental Conduct against the reporting person for making a report.

However, a report to an Eligible Recipient of a **personal, work-related grievance** will still qualify for protection under this Policy and the Act where it:

- involves, includes or is contained in a report about Reportable Conduct (a mixed report);
- concerns Detrimental Conduct suffered by or threatened against the reporting person in relation to the making of their report (for example, because they made, or are believed or suspected to have made or be planning to make, a Reportable Conduct Report); or
- is made to a legal practitioner to obtain legal advice or legal representation about whistleblower laws (even if the disclosure concerns a personal work-related grievance, and even if the legal practitioner concludes that the report is not otherwise protected).

A **personal, work-related grievance** concerns information about any matter in relation to the reporting person's employment, or former employment, which has (or tends to have) personal implications for the reporting person.

Example of personal, work-related grievances

- an interpersonal conflict between the person wishing to make the report and another employee;
- a decision relating to the engagement, transfer or promotion of the person wishing to make the report;
- a decision relating to the terms and conditions of engagement of the person wishing to make the report;
- a decision to suspend or terminate the engagement of the person wishing to make the report, or otherwise to discipline the person wishing to make the report.

If an individual has a personal work-related grievance, that individual is encouraged to speak with their manager or seek assistance through ElectraNet's Employee Assistance Program or the procedures outlined in 5-G15-P001 Respectful Workplace Behaviour Resolution Procedure (further details available on Maxwell).

5.2.2 False Reports

An individual will not be penalised for making a report of Reportable Conduct under this Policy which is subsequently found to be unsubstantiated, however, anyone who *knowingly* makes a false report, or who otherwise fails to act honestly and reasonably may be subject to disciplinary action. The disciplinary action taken will depend on the severity, nature and circumstances of the false report.

5.3 Responsibility to Report

ElectraNet relies on its employees to help maintain a culture of honest and ethical behaviour.

ElectraNet does not tolerate Reportable Conduct. It is expected that any Applicable Discloser who has reasonable grounds to suspect Reportable Conduct will make a **Reportable Conduct Report** in accordance with this Policy.

If an individual is concerned about whether or not conduct is Reportable Conduct, or whether their concerns are likely to fall under the Act and this Policy, that individual is encouraged to speak with an Eligible Recipient or the WPO about those concerns. They may also speak with an independent legal adviser.

5.4 Protection of Whistleblowers and Applicable Disclosers

There are a number of protections available to Whistleblowers under the Act.

An Applicable Discloser who is subsequently determined by the Executive, Legal Risk and Governance or WIO to be a Whistleblower under the Act will be afforded all of the protections under the Act and this Clause 5.4. The protections available to Whistleblowers under the Act apply regardless of whether a Whistleblower Report is made internally within ElectraNet to an Eligible Recipient, or through a permitted external channel. The protections for a Whistleblower continue to apply, even if it turns out that their concerns are incorrect or unsubstantiated.

An Applicable Discloser who makes or purports to make a Reportable Conduct Report in accordance with this Policy, whose report is subsequently found (through an investigation in accordance with Clause 5.5.5) *not* to constitute a Whistleblower Report, is still afforded the same protections (to the extent possible) by ElectraNet under this Clause 5.4. However, some protections are only available under the Act to Whistleblowers.

5.4.1 Confidentiality

Strict confidentiality obligations apply under the Act in respect of the identity of a Whistleblower and any information that is likely to lead to their identification. It is unlawful and an offence for a person to disclose this information, outside the exceptions set out in this Clause.

ElectraNet will ensure that:

- the identity of the Applicable Discloser or the Whistleblower; and
- any information that is likely to lead to the identification of the Applicable Discloser or the Whistleblower,

(together, "**Confidential Information**") will be kept confidential by the Eligible Recipient to whom the Reportable Conduct Report was made, unless an exception applies.

If an Applicable Discloser or Whistleblower makes a Reportable Conduct Report, they will be asked by the Eligible Recipient who receives it to provide their written consent to the disclosure of the Confidential Information, to facilitate any investigation or resolution of the matter. If they withhold their consent, it may not be possible for ElectraNet to adequately investigate and respond (if at all) to the report.

Where this consent is withheld, an Eligible Recipient will only disclose the Confidential Information if the disclosure is:

- a) required or allowed by law (for example, disclosure to ASIC, APRA, the AFP, other prescribed bodies or (in relation to tax matters) the Commissioner of Taxation);

- b) to a lawyer for the purposes of obtaining legal advice or representation relating to the law on whistleblowing; or
- c) reasonably necessary to investigate the Reportable Conduct, provided that the identity of the Applicable Discloser or Whistleblower is not disclosed, and all reasonable steps are taken to reduce the risk that the Applicable Discloser or Whistleblower will be identified as a result of the disclosure (see Clause 5.5.2 below as to measures to be taken).

Information contained in a Reportable Conduct Report that is not Confidential Information (for example, the nature or details of the alleged misconduct) may be disclosed, unless it would reveal the Applicable Discloser's identity or information likely to lead to their identification.

Notwithstanding the confidentiality protections set out above, it is possible that the identity of an Applicable Discloser may be guessed, particularly if:

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

If an Applicable Discloser or a Whistleblower considers or is otherwise concerned that ElectraNet has not maintained, or may not be maintaining, confidentiality in accordance with this Policy, they must report that matter to an Eligible Recipient or the WPO as soon as practically possible. ElectraNet will thoroughly investigate and remedy any reports of this nature.

5.4.2 Anonymity

A Reportable Conduct Report can be made anonymously under this Policy in whichever way is considered appropriate by the Applicable Discloser or the Whistleblower (for example, by anonymous telephone or email) and still be protected under this Policy or the Act. An Applicable Discloser or Whistleblower can also choose to remain anonymous over the course of an investigation and after it is finalised.

However, the Applicable Discloser or the Whistleblower should be aware that this may make it difficult for ElectraNet to properly investigate the report or to provide them with updates as to the progression and outcome of the investigation.

ElectraNet will treat an anonymous Reportable Conduct Report or a Whistleblower Report in the same way as it treats other Reportable Conduct Reports and Whistleblower Reports.

If you choose to remain anonymous, you should maintain ongoing two-way communication with ElectraNet, so that ElectraNet can ask questions or provide feedback to you.

5.4.3 Discrimination and Victimisation

It is unlawful and an offence under the Act to engage in or threaten Detrimental Conduct against an individual in relation to a Whistleblower Report. ElectraNet will take all reasonable steps to ensure that an Applicable Discloser or a Whistleblower (or other persons) will not be subjected to any form of Detrimental Conduct (including any threat of Detrimental Conduct) by virtue of or in part because of an Applicable Discloser or a Whistleblower having made, or having been believed or suspected to have made or be planning to make, a Reportable Conduct Report or a Whistleblower Report (even if

those reports are subsequently determined to find that there was no Reportable Conduct or the claims of Reportable Conduct were unsubstantiated).

Detrimental Conduct can include, but is not limited to:

- dismissal of an employee;
- injury of an employee in their employment;
- alteration of an employee's position or duties to their disadvantage;
- discrimination, harassment or intimidation;
- harm or injury to a person (including physical or psychological harm); and/or
- damage to reputation, property, business or financial position, or any other damage.

However, Detrimental Conduct does *not* include matters such as:

- administrative action that is reasonable for the purpose of protecting an Applicable Discloser or a Whistleblower from detriment (for example, moving an Applicable Discloser/Whistleblower from their immediate work area to another office to protect them from Detrimental Conduct); or
- managing an Applicable Discloser's/Whistleblower's unsatisfactory work performance.

If an Applicable Discloser or a Whistleblower considers that they are, or may be, subjected to any form of Detrimental Conduct, they must report that matter to an Eligible Recipient or the WPO as soon as practically possible. This further report in relation to Detrimental Conduct will be treated as a Reportable Conduct Report made under this Policy, provided it is made to an Eligible Recipient.

ElectraNet does not tolerate any form of Detrimental Conduct under this Policy and will thoroughly investigate and remedy any reports of this nature.

ElectraNet will take measures to protect an Applicable Discloser or Whistleblower from Detrimental Conduct as appropriate, such as:

- assessing the risk of Detrimental Conduct as soon as practicable;
- processes to ensure that all relevant persons within ElectraNet are aware of their responsibilities, including obligations of confidentiality, the need to avoid Detrimental Conduct, and the need to ensure fair treatment of all employees;
- offering support to the Applicable Discloser or Whistleblower, including access to ElectraNet's WPO and/or Employee Assistance Program;
- steps to help the Applicable Discloser or Whistleblower minimise and manage stress, time or performance impacts or other challenges resulting from their report or its investigation;
- actions, reassignments or modifications to protect the Applicable Discloser or Whistleblower from risk of Detrimental Conduct, if required, on a case-by-case basis;
- referring the Applicable Discloser or Whistleblower to the process for making a report under this Policy if they have suffered or been threatened with Detrimental Conduct; and
- interventions to protect the Applicable Discloser or Whistleblower if Detrimental Conduct occurs or is threatened.

5.4.4 Compensation and Remedies

Under the Act, compensation and other remedies can be sought through the courts where there is actual or threatened Detrimental Conduct in relation to the making or possible making of a Whistleblower Report.

5.4.5 Immunity

Under the Act, a Whistleblower will be protected from civil, criminal and administrative liability (including disciplinary action) for making a Whistleblower Report. This includes the enforcement of a contractual right or other remedy against that individual. Other provisions apply under the Act, for example, a Whistleblower Report cannot be used in evidence against the Whistleblower in criminal or penalty proceedings (other than in proceedings relating to making a false disclosure).

However, a Whistleblower should be aware that the immunities do not apply where the Whistleblower has also engaged in the Reportable Conduct the subject of their Whistleblower Report or that is otherwise revealed as part of the investigation into that individual's Whistleblower Report.

A Whistleblower should be also aware that the immunities may not apply where the Whistleblower is in breach of any laws or regulations whilst gathering information and evidence in preparation of making a Whistleblower Report.

While the immunities applicable under the Act to Whistleblowers are broader, to the extent possible, ElectraNet will extend the same protections to an Applicable Discloser for making a Reportable Conduct Report. This means that, subject to the same restrictions as set out above in this Clause 5.4.5, ElectraNet will not pursue civil action or disciplinary proceedings, or enforce contractual rights or other remedies, against an Applicable Discloser for making a Reportable Conduct Report.

5.5 How to make a Report

5.5.1 Step 1: Making a Reportable Conduct Report

If an Applicable Discloser wants to make a Reportable Conduct Report, they should make their report directly to:

- a) an officer or senior manager of ElectraNet, including a Director, the Company Secretary or a member of the Executive;¹
- b) the Head of People and Capability at ElectraNet;
- c) a Senior Legal Counsel, a Special Counsel or a Legal Counsel of ElectraNet; or
- d) ElectraNet's internal or external auditors or actuaries (including a member of an audit team conducting an audit)

(together, "**Eligible Recipients**").²

¹ A 'senior manager' is defined in the Act as (a) a Director or the Company Secretary (b) a person who makes, or participates in making, decisions that affect the whole, or a substantial part, of the corporation's business or (c) a person who has the capacity to affect significantly the corporation's financial standing.

² Applicable Disclosers are encouraged to report their concerns to the Eligible Recipients under this Policy, however, the Act also provides alternative mechanisms by which Applicable Disclosers can make Reportable Conduct Reports, including to ASIC, APRA and other prescribed authorities, bodies or persons, or to a lawyer for the purposes of obtaining legal advice or representation about

In relation to tax affairs, a Reportable Conduct Report may be made as follows:

- where an Applicable Discloser has information that they consider may assist the Commissioner of Taxation perform their functions or duties under a taxation law in relation to ElectraNet or one of its associates, the information may be reported directly to the Commissioner of Taxation; or
- where an Applicable Discloser has reasonable grounds to suspect that information indicates misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of ElectraNet or one of its associates, and considers that the information may assist the Eligible Recipient perform functions or duties in relation to the tax affairs of ElectraNet or one of its associates, the information may be reported directly to an Eligible Recipient. “**Eligible Recipient**” for this purpose includes any of the persons listed in 5.5.1 (a) to (d) above, ElectraNet’s registered tax agent or BAS agent, or employees or officers of ElectraNet who have functions or duties relating to ElectraNet’s tax affairs.

Information to include in a Reportable Conduct Report

Where possible, the following information should be provided to an Eligible Recipient when making a Reportable Conduct Report:

- the nature of the conduct, the reasonable grounds for suspicion and any background information (including how the Applicable Discloser became aware of those matters);
- any other procedures that the individual may have already used in relation to the conduct and the outcome;
- the names of the employees, or any other persons involved (if possible);
- dates or periods of time; and
- names of other persons who may support the Reportable Conduct Report.

How and when an individual decides to raise their concerns is a matter for them. The individual can speak with, or write personally to, an Eligible Recipient, or may choose to make the Reportable Conduct Report anonymously. Emails or letters should be marked confidential and to the attention of an Eligible Recipient.

Please see the heading “*Protection of Whistleblowers and Applicable Disclosers*”, above, for more information on the protections afforded to individuals under this Policy and under the Act.

5.5.2 Step 2: Confidentiality and Permissions

The Eligible Recipient within ElectraNet who receives a Reportable Conduct Report must comply with the confidentiality obligations set out in Clause 5.4.1. This means that they must not disclose any Confidential Information to any other person, including other Eligible Recipients, unless the written consent of the Applicable Discloser has been obtained or another exception applies.

The Eligible Recipient who receives a Reportable Conduct Report will seek permission from the Applicable Discloser to share their identity and identifying details for the purpose of handling the matter and facilitating any investigation or resolution. If the Applicable Discloser prefers, this can be

whistleblower protections. For more information about this, please refer to section 1317AA of the *Corporations Act 2001* (Cth) and section 14ZZT of the *Taxation Administration Act 1953* (Cth). A ‘public interest disclosure’ or an ‘emergency disclosure’ may also be made to a member of Parliament or a journalist under section 1317AAD of the *Corporations Act 2001* (Cth), but only if each of the strict requirements under that section are met. Independent legal advice should be sought before a public interest disclosure or an emergency disclosure is made.

limited to disclosure to specific persons (for example, the Executive, Legal Risk and Governance, the WPO and WIO).

In accordance with Clause 5.4.1(c) above, if this consent is not given, the Confidential Information (**but not the identity of the Applicable Discloser**) may be disclosed by the Eligible Recipient where reasonably necessary to investigate the Reportable Conduct, provided that all reasonable steps are taken to reduce the risk that the Applicable Discloser will be identified as a result. This includes proceeding to Steps 3 and 5 below, with the following measures in place.

Subject to any permissions from the Applicable Discloser, the Eligible Recipient and ElectraNet will take measures as appropriate to ensure that all Confidential Information will be treated in accordance with the strict confidentiality obligations outlined above, throughout the handling and investigation of a Reportable Conduct Report, such as:

- the Eligible Recipient asking the Applicable Discloser to help identify any particular aspects of their Reportable Conduct Report which could inadvertently identify them;
- redacting from the Reportable Conduct Report and any other documents the Applicable Discloser's name, position title, team and any other information that is likely to lead to their identification, for example, references to them witnessing an event only witnessed by a small number of persons, or other facts or circumstances;
- referring to them in a gender-neutral manner;
- secure record-keeping and storage of their identity and all documents containing Confidential Information (including the Reportable Conduct Report and all hard copy and electronic documents and reports relating to its handling and any investigation). Rights of access will be restricted to authorised persons (such as those directly involved in the handling and investigation of the matter); and
- reminding each person involved in handling and investigating a Reportable Conduct Report about the strict confidentiality requirements and the need to prevent unauthorised disclosure of information, either within, or outside, ElectraNet.

5.5.3 Step 3: ElectraNet Executive, Legal Risk and Governance

ElectraNet's Executive, Legal Risk and Governance is responsible for receiving all Reportable Conduct Reports, whether that be directly from the individual making the Reportable Conduct Report, or reports that have been referred to it by the Eligible Recipients outlined above.

The Executive, Legal Risk and Governance will determine how the Reportable Conduct Reports will be managed and investigated in accordance with the Act and this Policy.

The Executive, Legal Risk and Governance will also appoint a WPO to provide support to the Applicable Discloser (subject to their prior consent) and a WIO to investigate the Reportable Conduct Report.

5.5.4 Step 4: Whistleblower Protection Officer ("WPO")

Step 4 may **only** be undertaken where the Applicable Discloser **provides their consent** to their identity being provided to the WPO. At ElectraNet, the WPO is the Head of People and Capability, or as otherwise directed by the Executive, Legal Risk and Governance (for example, in circumstances where a Reportable Conduct Report is made directly to the WPO in their capacity as an Eligible

Recipient, the Executive, Legal Risk and Governance will appoint an alternative WPO to ensure impartiality).

The role of the WPO is to (where the identity of the Applicable Discloser is known):

- safeguard the interests of an Applicable Discloser in accordance with this Policy;
- assess and monitor the welfare of an Applicable Discloser and, where the Applicable Discloser is an employee, seek to foster a supportive work environment; and
- where the Applicable Discloser is an employee, manage any concerns or reports of victimisation by the Applicable Discloser.

5.5.5 Step 5: Investigation – Whistleblower Investigations Officer (“WIO”)

The Executive, Legal Risk and Governance will appoint an independent and impartial WIO to:

- conduct and/or supervise the investigation of a Reportable Conduct Report made under this Policy; and
- ensure procedural fairness and natural justice throughout the investigation process.

The WIO is a person in the role of Senior Legal Counsel at ElectraNet, or as otherwise directed by the Executive, Legal Risk and Governance.

The WIO will:

- assess and determine whether the Reportable Conduct Report falls within the intended scope of the Act;
- if it is determined that the Reportable Conduct Report is a Whistleblower Report, carry out a preliminary review of the Whistleblower Report and decide whether the allegations should be investigated or otherwise engage an independent third party to investigate and report upon the Whistleblower Report;
- investigate and manage the Whistleblower Report fairly, independently and expeditiously; and
- provide the Executive, Legal Risk and Governance with a written investigation report, which will include recommendations as to how the Whistleblower Report should be resolved or escalated (with appropriate measures and restrictions to preserve confidentiality), as the case may require.

Important note:

The WIO is not the personal legal adviser to an Applicable Discloser or a Whistleblower. The role of the WIO is to investigate the Reportable Conduct Report under this Policy and to convey those findings to the Executive, Legal Risk and Governance.

5.6 Reports Concerning Eligible Recipients, WPO or WIOs

If a Reportable Conduct Report involves an Eligible Recipient, a WPO or a WIO, the Applicable Discloser should direct their concerns to an Eligible Recipient who the Applicable Discloser reasonably believes to be independent of the subject matter of the Reportable Conduct.

5.7 Investigation Process

Wherever possible (for example, where the identity of the person making the report is known), an Applicable Discloser or Whistleblower will be kept regularly and reasonably informed as to the

progression and the outcome of the investigation, subject to any privacy and confidentiality considerations or any other reason that the Executive, Legal Risk and Governance (or their nominee) deems relevant in their sole discretion.

5.8 Breach of this Policy

Any breach of this Policy will be taken seriously and may result in disciplinary action, which can include dismissal. Civil and criminal penalties also apply for breaches of the protections under the Act. If an Applicable Discloser or Whistleblower has concerns with respect to any breach of this Policy, they are encouraged to speak with an Eligible Recipient or the WPO about those concerns. They may also seek independent legal advice or speak to a regulator such as ASIC or the ATO.

5.9 Changes to this Policy

This Policy does not form part of any employee's contract of employment or any other contract. It may be varied by ElectraNet at any time.

This Policy will be made available to all officers and employees of ElectraNet upon their commencement of employment and via Maxwell. An external version will also be made available on ElectraNet's website.

6. Associated Documents

6.1 Schedule 1 – Prescribed Legislation

1. *Australian Securities and Investments Commission Act 2001* (Cth);
2. *Banking Act 1959* (Cth);
3. *Corporations Act 2001* (Cth);
4. *Financial Accountability Regime Act 2023* (Cth);
5. *Financial Sector (Collection of Data) Act 2001* (Cth);
6. *Insurance Act 1973* (Cth);
7. *Life Insurance Act 1995* (Cth);
8. *National Consumer Credit Protection Act 2009* (Cth);
9. *Superannuation Industry (Supervision) Act 1993* (Cth); or
10. an instrument made under the legislation referred to in any of subparagraphs (1) to (9) above.