

1. INTRODUCTION TO THE WINNING SPEAK UP POLICY

Winning Appliances Pty Limited and each of its subsidiaries (collectively, Winning Group) are committed to a culture of integrity. Our guiding values help to influence how we behave and interact with others, whether that be with our colleagues, our customers or our suppliers. The Winning Group is committed to promoting and supporting a culture of honest and ethical behaviour, compliance and strong corporate governance.

2. PURPOSE OF THE POLICY

The purpose of this Policy is to encourage the reporting of any actual or suspected wrongdoing or any other issues that may be affecting your wellbeing at work or that may be affecting the Winning Group, its customers or suppliers.

The Winning Group recognises the importance of ensuring a safe, supportive and confidential environment where people feel confident to 'speak up' about wrongdoing and feel supported throughout the process.

This Policy establishes the minimum requirements for how the Winning Group will foster and encourage a safe and confidential culture of speaking up whilst ensuring there are protections and protocols in place to support those who elect to seek protection as a result of speaking up under this policy.

3. SCOPE OF THE POLICY

The Policy applies to all current and former employees, officers, contractors, service providers, associates and suppliers of the Winning Group who wish to make a Report about actual or suspected wrongdoing or any other issue that may be affecting your wellbeing at work or that may be affecting the Winning Group, its customers or suppliers. This Policy also applies to relatives and dependants of those employees, contractors, service providers, associates and suppliers.

Reports made under this Policy fall into two categories:

- your Report may be general in nature ('speaking up'); or
- in the event you have concerns for your wellbeing, safety or fear reprisal as a result of making a Report and you are reporting Reportable Conduct (defined in 4.4, below), you can elect to seek protection under this Policy.

Whistleblowers who report Reportable Conduct are provided with protection as set out in the *Corporations Act 2001* (Cth) and the *Taxation Administration Act 1953* (Cth).

4. SPEAKING UP AND / OR WHISTLEBLOWING

4.1. When to Speak Up?

- a. Any current or former employee, officer, contractor, service provider, associate, supplier (or their relative or dependant) who sees or suspects any wrongdoing or any other issue that may be affecting their wellbeing at work, or that may be affecting the Winning Group, its customers or suppliers are encouraged to 'speak up' and report the issue at the earliest opportunity.
- b. Where practicable, you are encouraged to approach your line manager in the first instance (if an employee



or contractor) or primary point of contact (in the case of a supplier) as this provides a practical option to discuss your concerns and for the Winning Group to take management action where appropriate. Alternatively, if the Report involves your line manager (or primary point of contact), you are encouraged to report your concerns to Team Experience.

- c. If the Report involves the Chief Executive Officer, Chief Operating Officer or a member of the Advisory Board or Board of Directors, you are encouraged to approach the Winning Group's General Counsel & Company Secretary, Amy Cowper, in the first instance.
- d. If you choose to speak up, and in making a Report, feel that it isn't appropriate to report the issue to your line manager (or primary point of contact), a member from Team Experience or you have concerns for your wellbeing or fears of reprisal as a result of making the Report (i.e. speaking up), you may elect to seek protection as provided for in terms of this Policy.

4.2. What can I Speak Up about?

You should Speak Up if your report concerns:

- a. a general health and/or safety issue;
- b. bullying, harassment or discrimination;
- c. a breach of an internal policy; and/or
- d. any other inappropriate behaviour.

If the nature of your concern relates to a grievance or performance issue, you are encouraged to follow the Winning Group's formal complaint management/grievance procedure. Further information on this procedure can be obtained from the [Grievance Handling](#) section of the [Winning Group Key Policies](#) document. These concerns may, dependant on the circumstances, may also be considered Reportable Conduct.

4.3. Who can be a Whistleblower?

A Whistleblower is any person, whether they be a current or former employee, officer, contractor, or service provider, associate, supplier (or their relative or dependant) of the Winning Group), who:

- makes a Report relating to any suspected or actual wrongdoing or other issue as defined (as Reportable Conduct below);
- makes the Report through one of the reporting channels set out in this Policy;
- who makes a report on a reasonable suspicion ; and
- seeks to have their Report protected under this Policy (Protected Disclosure).

4.4. What is Reportable Conduct?

Reportable Conduct includes any conduct (e.g. issue or wrongdoing) which could be considered to be:

- misconduct such as any illegal, unethical or improper conduct
- a breach of any legislation, regulation or criminal conduct
- dishonest or fraudulent conduct (including bribery and/or corruption);
- financial irregularities;
- an activity that significantly or seriously endangers health, safety or the environment;
- serious impropriety or an improper state of affairs or circumstances; and/or

- concealing any of the above conduct.

As set out below, personal work-related grievances are not generally considered to be Reportable Conduct.

4.5. What are personal work-related grievances?

Personal work-related grievances are not generally covered by this policy and do not qualify for protection under the Corporations Act.

Personal work-related grievances are those grievances that tend to have implications for you personally but do not have any significant implications for the Winning Group or do not relate to Reportable Conduct. Examples of personal work-related grievances may include conflicts between you and another employee or other employment matters such as decisions relating to promotions or termination.

However, a personal work-related grievance may qualify for protection where:

- a report contains a mixture of misconduct and personal work-related grievances;
- the grievance involves breaches of employment or other laws punishable by imprisonment for a period of 12 months or more, engaging in conduct that represents a danger to the public or the disclosure relates to information that suggests misconduct beyond your personal circumstances;
- you suffer from or are threatened with detriment for making a disclosure; or
- you seek legal advice or legal representation about the operation of the whistleblower protections under the Corporations Act.

4.6. How do you ‘Speak Up’ or report Reportable Conduct (i.e. provide a Whistleblower Report)?

Winning Group provides a number of reporting channels for current or former employees, officers, contractors, or service providers, associates, suppliers (or their relatives or dependants) of the Winning Group to ‘speak up’ and report Reportable Conduct.

Channel	Details
Web & Online (URL)	https://qrs.ly/Winning
Web & Online (QR Code)	



Speak Up/Whistleblower Policy

Email	speakup@coreintegrity.com.au
Phone	1800 324 775
Mail	Speak Up P.O. Box 895 Darlinghurst NSW 1300
Government agencies	<ul style="list-style-type: none"> • ASIC; • APRA; or • another Commonwealth body prescribed by regulation.
Auditors	<ul style="list-style-type: none"> • internal or external auditor; or • an actuary of Winning Group.
Legal practitioner	<p>A legal practitioner for the purpose of obtaining legal advice or representation in relation to the operation of the provisions of the relevant legislation.</p> <p>You can elect to speak to a legal practitioner even if the legal practitioner concludes that your report does not relate to Reportable Conduct.</p>
Internal	<ul style="list-style-type: none"> • an officer (including a director or company secretary) or senior manager of Winning; • another employee or officer who has functions or duties in relation to Winning’s tax affairs; or • a Winning Speak Up Champion

The Winning Group’s ‘Speak Up Hotline’ is an externally managed and independent hotline service provided by our integrity partners, Core Integrity Pty Ltd (“Core Integrity”).

Core Integrity are experienced in the management of speak up and Whistleblower reports. The Core Integrity team treat all matters in the strictest of confidence and adhere to the procedures outlined in this Policy.

If you wish to report Reportable Conduct, your report will qualify for protection if you report the conduct through one of the above channels.

4.7. What happens when you make a Report?

When making any report under this Policy, you will be requested to provide as much information as possible about the issue being raised. Information such as dates, times, location, individuals involved, other witnesses, physical evidence (e.g. documents, images) and any other general information may be sought.

This information is important as it enables the Winning Group to properly assess the concerns being raised and decide on the appropriate course of action to be taken.

Any information provided in a Report may be used by the Winning Group in consideration of an investigation or some other action except in certain circumstances such as a Protected Disclosure where the person speaking up (a Whistleblower) has specifically requested that such information is kept confidential.

4.8. How is your Report Protected?

1. If you make any Report under this Policy you will have your details, and the information you provide, treated in the strictest of confidence. You can elect to have your Report protected under this Policy (i.e. a 'Whistleblower') if:
 - you report Reportable Conduct and you have reasonable grounds to believe the Report and information supplied is true; and
 - you make the report through one of the channels set out at 4.6.

Your Report will also be protected if you make an emergency or public disclosure (see 4.10 below).

If you satisfy the above criteria, you will qualify for protection even if your disclosure turns out to be incorrect.

2. The Winning Group is committed to ensuring that a person who speaks up in terms of this Policy is provided support and protection from personal or financial disadvantage as a result of making a Report on reasonable grounds.

A Whistleblower who makes a Report through any of the channels set out in this policy will be afforded protection and the Winning Group will not tolerate any form of retaliation against persons who make a Report on reasonable grounds under this Policy.

You will be afforded legal protections in accordance with the Corporations Act. This means that another person cannot cause you any detriment because they believe or suspect that you report, may have reported, are proposing to report or could report Reportable Conduct that qualifies for protection. This protection against detriment also applies where a person has only threatened to cause you detriment.

3. Winning Group cannot disclose your identity or any information that is likely to lead to your identification (which has been obtained directly or indirectly). It is illegal for us to do so.

The only exceptions to this are:

- where your identity is disclosed by us to ASIC, APRA, or a member of the Australian Federal Police;
- to a legal practitioner for the purposes of obtaining legal advice or legal representation about the whistleblower provisions in the Corporations Act;
- to a person or body prescribed by regulations; or
- where you have consented to us disclosing your identity.

We may also need to disclose information contained in your Report with or without your consent if:

- the information doesn't include your identity;
- we have taken all reasonable steps to reduce the risk that you will be identified from the information; and
- it is reasonably required for us to disclose the information to investigate the issues you have raised in your

Report.

If you believe your identity or information has been disclosed in circumstances not covered by the exceptions above, please report this breach of confidentiality to the Speak Up Investigations Officer (SUIO). You can also lodge a complaint with ASIC or APRA.

4. If a person who speaks up believes that they have been subjected to a reprisal as a result of their Protected Disclosure, the first point of contact should be to notify the Speak Up Protection Officer (SUPO).
5. Winning will make efforts to ensure that all personal information or reference to a person who has made a Report will be redacted and the person will be referred to in a gender-neutral context. Any documents relating to the disclosure will be stored securely and limited to those involved in investigating the disclosure.

4.9. Can you remain anonymous?

Any person making a Report under this Policy can choose to remain anonymous, including those seeking protection.

The identity of the person making a Report will be protected unless the person making the Report consents to the disclosure of their identity or if the Winning Group has been compelled or permitted by Law, regulatory obligations or broader external requirement to disclose the person's identity. Please note that we will treat any Report from an email address where we cannot determine your identity (and you do not identify yourself in the email) as an anonymous disclosure. You can also choose to adopt a pseudonym if you wish.

It is important to remember that anonymous reports can, at times, be more difficult to investigate and if you choose to remain completely anonymous and do not provide any contact information, the Speak Up Protection Officer (SUPO) and/or Speak Up Investigations Officer (SUIO) will be unable to make contact with you to ask further questions about your report or provide you with any updates on the investigation or provide you with feedback on the Report.

Should you wish to remain anonymous, you are encouraged to submit your Report via our online reporting channel (web link and/or QR code).

If you submit a Report via our online reporting channel, and elect to remain anonymous, you can receive updates on your Report, provide more information and check on the status of your Report by supplying your email address. Your email address **will not** be accessible or visible to anyone from within the Winning Group or the independent and external provider, Core Integrity, thereby providing you with true anonymity. We also encourage you to maintain communication after you submit your Report, so that we can ask any follow up questions or provide feedback.

You can choose to remain anonymous while making a disclosure, over the course of any investigation and after the investigation is finalised. You can also refuse to answer any questions you feel could identify you at any time.

4.10. Public interest and emergency disclosures

The Corporations Act also provides protections for public interest disclosures and emergency disclosures which meet specific requirements prescribed by the Act. Such Reports may be made to a journalist or a parliamentarian.

It is important to understand that, to qualify for protection in the circumstances, you must have previously made a Report of Reportable Conduct to ASIC, APRA or another Commonwealth prescribed body and you must have provided written notice to the body to which you made the Report. Where you are making a Report in the public interest, at least 90 days must have passed since you made the Report to ASIC, APRA or another Commonwealth prescribed body.

You should obtain independent legal advice before making a public interest disclosure or an emergency disclosure.

5. INVESTIGATION FOLLOWING A REPORT

5.1. Stage One

Once a report has been received, it will firstly be assessed to determine whether it qualifies for protection. Once assessed, Winning Group will determine the appropriate action required. Examples of actions could include:

- the report is forwarded for an investigation to take place;
- the report is recorded for information purposes; or
- no further action is taken.

If a Report you submit is recommended for information purposes or for no further action, where practicable you will be contacted and advised of the determination.

5.2. Stage Two

If a report you submitted is recommended for an investigation to take place, an assessment will be made by a member of Team Experience or, in the event of a Protected Disclosure, the Speak Up Investigations Officer (SUIO).

The Report will be assigned to an appropriate investigator for further action.

The investigation may be conducted by the SUIO, a Winning Group employee nominated by the SUIO or by an external investigator appointed by Winning Group.

All investigations will be conducted in a manner that is fair, confidential, objective (without bias) and timely manner.

5.3. Stage Three

At the conclusion of an investigation, you may, where appropriate, be informed of the outcome of the investigation by a member of Team Experience, the SUIO or another senior member of the Winning Group.

5.4. Discretions

Winning Group may in certain circumstances, whether required by law or in its discretion, inform the relevant authority of any contents of a report made at any stage of the investigation.

6. ROLES AND RESPONSIBILITIES

6.1. Speak Up Protection Officer (SUPO)

- a. The Speak Up Protection Officer (SUPO), often called a Whistleblower Protection Officer, is usually a senior employee appointed by Winning Group to, as far as is reasonably practicable, protect persons who seeks protection when making a Report and is accountable for the provisions of this Policy.

In respect of Protected Disclosures, the SUPO will:

- provide assistance and support to a person seeking protection for speaking up before, during or after they make a Report in respect of this Policy;



- consider whether the conduct or issues raised amounts to Reportable Conduct;
- enable the investigation of Reportable Conduct;
- maintain the confidentiality, privacy and anonymity (as required and where practical and appropriate) of the person speaking up.
 - b. details of Winning’s current SUPO can be found on the Winning intranet on its Speak Up page found at <https://sites.google.com/winning.com.au/winningweb/policies-guidelines-forms>.
 - c. The SUPO is Amy Cowper, General Counsel and Company Secretary (Winning Group).

6.2. Speak Up Investigation Officer (SUIO)

- a. The Speak Up Investigation Officer (SUIO), often called a Whistleblower Investigation Officer, is responsible for leading, co-ordinating or overseeing the investigation of Protected Disclosers made under this Policy.
- b. The SUIO can elect to appoint another party, either from within the Winning Group or external to it, to undertake an investigation on their behalf under this Policy and is to ensure that the investigation is conducted in a fair, confidential, objective (without bias) and timely manner.
- c. Whistleblower reports will be assessed by the SUIO who will review the Report and decide on the appropriate next steps. The SUIO may be assisted, as required, in determining what the appropriate next steps should be.
- d. Details of Winning’s current SUIO can be found on the Winning intranet on its Speak Up page found at <https://sites.google.com/winning.com.au/winningweb/policies-guidelines-forms>.
- e. The SUIO is Ed Brenac, Head of TX (Winning Group).

6.3. Speak Up Champions

As further demonstration of its commitment in fostering a safe, supportive and confidential environment where people feel confident to ‘speak up’ about wrongdoing, the Winning Group has appointed ‘Speak Up Champions’ whose role is to act as positive supporters (champions) of this Policy and the commitment to speaking up across the Group.

Speak Up Champions are senior members of the Winning Group who display Winning’s values and they will ensure the intent of this Policy and program is upheld.

Any employee, contractor or supplier can approach a Speak Up Champion to seek advice or assistance in relation to this Policy and program. Speak Up Champions can refer those seeking advice to the appropriate area internally, and where appropriate, take a Report on behalf of an employee, contractor or supplier and submit this through the Speak Up Hotline.

- a. Winning Speak Up Champions are:
 - **Jo Devery:** Chief Operating Officer (Winning Group)
 - **Mick Bunt:** GM, Winning Services (Winning Services)
 - **Julian Kipping:** Lead, National Stores (Winning Appliances)



- **Bradley Wyeth:** Indooroopilly Store Manager (Winning Appliances)
- **Virginia Pacella:** NSW DC Administration Team Leader (Winning Services)
- **Reshma Ross:** Customer Support Team Leader (Home Clearance)
- **Tim Collings:** DC Manager Western Australia (Winning Services)
- **Robert Gray:** DC Manager Victoria (Winning Services)

6.4. Employee Assistance Program (EAP)

- When a person who makes a Report of Reportable Conduct under this Policy, the SUPO will be responsible for overseeing the protection of that person. A Whistleblower who experiences any issues as a result of their disclosure, should in the first instance contact the SUPO.

Any employee, contractor or supplier seeking general welfare support or counselling should contact Winning’s Employee Assistance Program (EAP).

- The Winning Group offers any employee, contractor or supplier access to confidential support and counselling through our Employee Assistance Program (EAP).

This is a free and confidential service provided by an independent and external provider, Converge International:

Ph: 1300 687 327

www.convergeinternational.com.au

Further information relating to the EAP can be obtained by viewing the EAP Policy.

7. GLOSSARY OF KEY TERMS

Term	Definition
Report	A Report is a disclosure made by any current or former employee, officer, contractor, service provider, associate or supplier (or their dependant or relative), whether protected or not, through the Speak Up Hotline or via the other methods set out in this policy. A Report can be general in nature or can be a Protected Disclosure.

**Reportable
Conduct**

Reportable Conduct includes any conduct (e.g. issue or wrongdoing) which could be considered to be:

- misconduct such as illegal, unethical or improper conduct
- a breach of any legislation, regulation or criminal conduct
- dishonest or fraudulent conduct (including bribery and/or corruption);
- financial irregularities;
- an activity that significantly or seriously endangers health, safety or the environment;
- serious impropriety or an improper state of affairs or circumstances;
- a Whistleblower protection issue; and/or

any other inappropriate behaviour, which may qualify as a Protected Disclosure. Personal work-related grievances are not generally considered to be Reportable Conduct.

Protected Disclosure	<p>For a Report to qualify as a Protected Disclosure, the person reporting must, amongst other things:</p> <ul style="list-style-type: none"> • be a current or former employee, officer, contractor, service provider, associate or supplier (or their dependant or relative), to the Winning Group (or its subsidiaries); • make the disclosure in according with the provisions of the Corporations Act; • be making a disclosure of Reportable Conduct; • make the disclosure on a reasonable grounds <p>The protection extends to any adverse action or reprisal action that the person reporting may suffer as a result of making the disclosure, and not the conduct itself.</p> <p>A Protected Disclosure does not remove or reduce liability from a person reporting for any potential wrongdoing they may have been a party to, whether or not it is related to the disclosure being made.</p>
Speak Up Champion	A senior member of the Winning Group who display Winning’s values and ensure the intent of this policy and program is upheld. Speak Up Champions provide advice, support and leadership of the Speak Up Policy and program across the Group.
Whistleblower	Any current or former employee, officer, contractor, or service provider, associate, supplier (or their relative or dependant) who makes a Report (disclosure) of reportable conduct, on reasonable grounds and seeks protection under this Policy.
Speak Up Investigation Officer (SUIO)	Often called a Whistleblower Investigation Officer. The Speak Up Investigation Officer is a senior member of the Winning Group who is responsible for leading, co-ordinating or overseeing the investigation of Protected Disclosures in a fair, confidential, objective (without bias) and timely manner.
Speak Up Protection Officer (SUPO)	Often called a Whistleblower Protection Officer. The Speak Up Protection Officer is a senior member of the Winning Group who is responsible, as far is reasonably practicable, to protect Whistleblowers and is accountable for the provisions of this Policy.

8. AVAILABILITY OF THE POLICY

Copies of this policy can be accessed on the Winning Web. This policy is publicly available on www.winning.com.au

You can also request a copy of this policy be sent to you by a member of the TX team.

Speak Up/Whistleblower Policy

Doc Prefix:

WGSU
Version NO: 002
Date: 27/12/2019

Policy Owner	Head of Team Experience
Next Review Date	December 2020