



Whistleblower Policy

Policy Hierarchy:	Board Policy
Division:	People & Culture
Accountable Owner:	Group Chief People Officer - Janita Valentine
Policy Owner:	General Manager, Executive Performance & Remuneration
Policy Author:	General Manager, Executive Performance & Remuneration
Version:	5.0
Review Frequency:	Annually
Approved by:	AGIC Board
Approval Date:	31 October 2025
Next review date:	October 2026

Any unauthorised use or disclosure is prohibited.

1. Purpose	3
2. Scope	3
3. Applicability	3
4. Approval and Review Process	3
5. Principles	3
6. Protected Disclosures	4
6.1 Eligible Whistleblowers	4
6.2 Reportable Conduct	4
6.3 Work-Related Grievances	4
6.4 Eligible Recipients	5
7. Reporting Conduct under this Policy	6
7.1 Anonymity	6
7.2 Public Interest Disclosures	6
7.3 Emergency Disclosures	6
8. Assessment and Investigation of Protected Disclosures	7
8.1 Confidentiality	7
8.2 Record Keeping	8
8.3 False or Misleading Disclosures	8
8.4 Involvement In Reported Conduct	8
9. Whistleblower Support and Protection	9
9.1 Protection for Whistleblowers	9
9.2 Support for Whistleblowers	9
9.3 Support for Individuals Mentioned in a Whistleblower Disclosure	9
10. Governance, Roles and Responsibilities	10
10.1 Governance	10
10.2 Roles and Responsibilities	10
11. Compliance	11
12. Change Management	11

1. PURPOSE

We are committed to the highest standards of conduct and ethical behaviour in all our business activities, and actively promote a culture of transparency, corporate compliance, and good corporate governance.

Our work environment encourages and allows employees to operate with ownership and integrity, be recognised and rewarded for their achievements, and to feel safe to raise matters of concern.

The purpose of this Policy is to encourage the reporting of dishonest, illegal, fraudulent or unethical conduct that is contrary to our Company Values, and to ensure that such reports can be made without fear of intimidation, disadvantage or punishment.

2. SCOPE

This Policy applies to all Eligible Whistleblowers and entities of the Group as outlined in section 3. Applicability. The protections afforded by this Policy and the Corporations Act are strictly limited to Protected Disclosures.

3. APPLICABILITY

This Policy applies to all entities within the Level 2 Prudentially Regulated Insurance Group (referred to in this document as "the Group"), specifically:

- Auto & General Insurance Company Limited (AGIC);
- Auto & General Holdings Pty Ltd (AGH);
- Auto & General Services Pty Ltd (AGS); and
- Compare the Market Pty Ltd (CTM).

In addition, this policy also applies to Pet Health Insurance Services Pty Ltd (PHIS) and Control Insurance Solutions Ltd (CIS).

This Policy applies to all Directors, Officers, contractors, employees and third party representatives of the Group. A reference to AGIC is also a reference to AGIC in its capacity as head of the Group.

4. APPROVAL AND REVIEW PROCESS

The Whistleblower Policy is approved by the AGIC Board. It will be reviewed at least every 12 months, and will include endorsement of the IA ExCo Risk Committee, AGIC Board Risk Committee, and the CTM (Aggregation) Board.

5. PRINCIPLES

All members of the Group are expected to behave and operate in a manner that promotes honesty, and transparency. This includes reporting disclosable matters as outlined within this Policy.

To support this practice, we are committed to:

- treating reports of actual or suspected improper conduct seriously;
- encouraging individuals to report an issue if they reasonably believe someone has engaged in wrongdoing;
- allowing individuals to disclose wrongdoing safely, securely and with confidence that they will be protected and supported;
- dealing with disclosures appropriately and on a timely basis; and
- providing transparency around the framework for receiving, handling and investigating Protected Disclosures, as far as reasonably practicable.

6. PROTECTED DISCLOSURES

A Protected Disclosure is when an Eligible Whistleblower makes a disclosure of information that is Reportable Conduct to an Eligible Recipient. A person who makes a Protected Disclosure under this Policy will be subject to the protections of the Corporations Act.

6.1 ELIGIBLE WHISTLEBLOWERS

Eligible Whistleblowers are current and former:

- Employees and contractors of the Group;
- Directors and Officers of the Group;
- suppliers of goods or services to the Group (whether paid or unpaid), and their representatives;
- Associates of the Group; and
- relatives, dependents, and/or spouses of any individuals referred to in this section.

6.2 REPORTABLE CONDUCT

Disclosable matters involve information that the discloser has reasonable grounds to suspect concerns misconduct, or an improper state of affairs or circumstances, in relation to the Group.

Such matters are considered Reportable Conduct under this Policy, and include:

- Corrupt conduct;
- Fraud, theft, or bribery;
- Conduct that constitutes an offence against any of the legislation within the Whistleblower Legislative Framework;
- Conduct that constitutes an offence against any law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more;
- In the case of AGIC, that a Responsible Person does not meet the fit and proper criteria set out in AGIC's Fit and Proper Policy;
- Misconduct or an improper state of affairs or circumstances in relation to the tax affairs of the Group, or an entity within the Group;
- Group practices endangering the environment;
- Group practices endangering the health or safety of a member of the Group, volunteers, or the general public;
- Conduct that represents a significant risk to public safety or the stability of or confidence in the financial system; or
- Engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure, or is believed, or suspected to have made, or be planning to make, a disclosure under this Policy.

6.3 WORK-RELATED GRIEVANCES

The protections afforded by this Policy and under the Corporations Act do not apply to personal work-related grievances, such as:

- an interpersonal conflict between the discloser and another member of the Group;
- a decision about the engagement, transfer, or promotion of the discloser; or
- a decision to suspend or terminate the engagement of the discloser, or otherwise to discipline the discloser.

The **Disputes and Grievances Policy** and other policies provide a process for raising such issues. However, a disclosure about, or including, a personal work-related grievance may qualify for protection under this Policy and the Corporations Act if the disclosure:

- relates to misconduct that is considered Reportable Conduct under this Policy;
- relates to a breach of employment or other laws punishable by imprisonment for a period of 12 months or more;

- relates to conduct that caused detriment to an Eligible Whistleblower under this Policy, or a threat of such conduct in connection with a disclosure, or potential disclosure;
- has significant implications for the Group;
- has been made to a legal representative for the purpose of seeking legal advice or legal representation about the operation of the whistleblower protections under the Corporations Act.

Where an employee has a workplace dispute or grievance, they should refer to the **Disputes and Grievances Policy** and can speak with their manager or People and Culture representative.

6.4 ELIGIBLE RECIPIENTS

To qualify for protection under this Policy, a disclosure must be made to one of the following Eligible Recipients:

Whistleblower Protection Officer

We have appointed the following person to be Whistleblower Protection Officer (**WPO**), who will receive and manage internal disclosures under this Policy:

Name	Group Chief People Officer
Telephone	(07) 3096 8481
Email	whistleblower@autogeneral.com.au
Mail	Level 13, Toowong Tower, 9 Sherwood Road, Toowong QLD 4066

If you suspect that the WPO may have a conflict, for instance, by being involved in conduct or they are the subject of your proposed report, you may make your report to the Group Managing Director & CEO (Asia Pacific):

Name	Group Managing Director & CEO (Asia Pacific)
Telephone	(07) 3377 8808
Email	ram.kangatharan@autogeneral.com.au
Mail	Level 13, Toowong Tower, 9 Sherwood Road, Toowong QLD 4066

While you are encouraged to make reports under this Policy to the WPO, you are also entitled to make reports to other listed Eligible Recipients.

Supervisor /Manager

A disclosure may be made to an Eligible Recipient of the Group, which means:

- a Director or Officer; or
- a Senior Manager.

If you make a report to an Eligible Recipient of the Group, it is important that you first state that you wish to make a report under this Policy, so that the recipient understands that the terms of this Policy need to be met.

In circumstances where an Eligible Recipient of the Group receives a report under this Policy, they should immediately notify the WPO and follow their directions.

Legal Practitioner

You may also disclose the matter to your own external legal practitioner for the purposes of obtaining legal advice or representation.

External Agencies

You may disclose their matter directly to any of the following external agencies:

ASIC	https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing
APRA	https://www.apra.gov.au/become-a-whistleblower-and-make-a-public-interest-disclosure
KPMG	(07) 3233 3127
ATO	https://www.ato.gov.au/general/gen/whistleblowers/ (applicable to tax matters only)

7. REPORTING CONDUCT UNDER THIS POLICY

A person wishing to submit a report under this Policy should do so as soon as possible after becoming aware of a matter covered by this Policy.

Reports of conduct protected under this Policy should be made to an Eligible Recipient, either in person, via phone, email, or mail to ensure a record of the conduct is received.

If you contact an Eligible Recipient to make a disclosure, you should be prepared to provide the following details:

- information regarding the conduct you wish to report;
- whether you are comfortable providing your identity (and where anonymity is desired, taking care not to reveal your identity in an email or letter); and
- whether you agree to further contact to discuss and be provided with updates on your report.

7.1 ANONYMITY

You may make a report anonymously or under a pseudonym, and still be eligible to qualify for the protections under this Policy and the Corporations Act. You are also entitled to remain anonymous or use a pseudonym during the course of the investigation and to refuse to answer any questions put to you.

Where a report is made anonymously, we will apply the same approach to assessing and investigating the disclosure as if you had revealed your identity. However, there may be some practical limitations in conducting the investigation if you do not share your identity.

A disclosure who wishes to remain anonymous should consider maintaining ongoing two-way communication with the Company, so the Company can ask follow-up questions or provide feedback (e.g., through a dedicated and private email account).

7.2 PUBLIC INTEREST DISCLOSURES

If you make a report to ASIC or APRA (but not otherwise), you are also entitled to disclose information to a journalist or parliamentarian in the following circumstances:

- If at least 90 days have passed since you made your report to ASIC or APRA; and
- you do not have reasonable grounds to believe that actions are being, or have been taken in relation to your report; and
- you have reasonable grounds to believe that making further disclosure of the information is in the public interest; and
- before making the public interest disclosure, you have given written notice to ASIC or APRA (as appropriate) that identifies the disclosure and states that you intend to make a public interest disclosure.

It is recommended that you contact an independent legal adviser before making a Public Interest Disclosure.

7.3 EMERGENCY DISCLOSURES

If you make a report to ASIC or APRA (but not otherwise), you are also entitled to disclose information to a journalist or parliamentarian in the following circumstances:

- If you have reasonable grounds to believe that information the subject of your report concerns a substantial and imminent danger to the health or safety of one or more persons, or to the natural environment; and
- before making the emergency disclosure, you have provided written notice to ASIC or APRA (as appropriate) that identifies the disclosure and states that you intend to make an emergency disclosure; and
- the extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the journalist or parliamentarian of the substantial and imminent danger.

It is recommended that you contact an independent legal adviser before making an emergency disclosure.

8. ASSESSMENT AND INVESTIGATION OF PROTECTED DISCLOSURES

Upon receiving a disclosure, the Eligible Recipient will confirm that the report has been received. An assessment will then be made as to whether the disclosure falls within the scope of this Policy, and whether an investigation is required. The specific steps taken to manage or investigate a disclosure will depend on the nature of the Reportable Conduct, which will be assessed on a case by case basis.

Investigation steps taken may include:

- undertaking preliminary fact-finding;
- interviewing of relevant witnesses;
- reviewing and collating evidence;
- seeking advice from external agencies;
- liaising with the police, other law enforcement agencies or regulatory bodies; and/or
- reporting on findings.

You may be kept informed of the progress of the investigation, if you consent to further contact. You may also be consulted or asked to clarify information.

All investigation findings under this Policy will be reported to the WPO or, where it is more appropriate to do so, the Group Managing Director & CEO (Asia Pacific) (**GMD**). Through consultation with appropriate parties, the WPO or GMD will determine any further actions to be taken.

If it is appropriate to do so, the Eligible Whistleblower may be provided with details of the investigation outcome, but that is not a requirement of this Policy.

8.1 CONFIDENTIALITY

The WPO or the Group cannot disclose information that is likely to lead to the identification of the discloser as part of its investigation process, unless:

- The information does not include the discloser's identity;
- The entity removes information relating to the discloser's identity or other information that is likely to lead to the identification of the disclosure (e.g., the discloser's name, position title and other identifying details); and
- It is reasonably necessary for investigating the issues raised in the disclosure.

A person can disclose the information contained in a disclosure with or without the discloser's consent if:

- The information does not include the discloser's identity;

- The entity has taken all reasonable steps to reduce the risk that the disclosure will be identified from the information; and
- It is reasonably necessary for investigating the issues raised in the disclosure.

All information provided by you, as part of a report under this Policy, will be held in the strictest confidence and all reasonable steps will be taken to protect your identity. All files and documentation will be kept secure in suitable locations and only accessed by the WPO or in accordance with their directions. Interviews, meetings, and phone calls related to an investigation will be undertaken in private.

Where information is provided to an investigator or other individuals (e.g., the Board), they are to maintain confidentiality over the information in accordance with the WPO's directions. In passing on any information, care will be taken to minimise the risk of you being identified, for instance, by using gender neutral language and removing aspects of the information which could point towards your role within the Company.

Where you provide your identity in connection with a report under this Policy (or the Company otherwise comes to know your identity), that will only be disclosed to individuals other than the WPO in the following circumstances:

- With your consent;
- To ASIC, APRA or the Australian Federal Police; or
- To a legal practitioner for the purpose of obtaining legal advice or representation about the whistleblower provisions in the Corporations Act.

It is illegal for a person to disclose your identity if you are an Eligible Whistleblower or information likely to lead to your identification other than in these circumstances.

Information the subject of a report under this Policy will only be disclosed to an investigator or other individual where reasonably necessary for investigating the issues raised in the report. That information will not include your identity (where known) unless the WPO has first obtained your written consent. If consent is not given, your identity will not be provided to the investigator, and all reasonable steps will be taken to reduce the risk that you will be identified from other information. However, your refusal to consent to providing your identity to an investigator may impact the effectiveness of the investigation.

8.2 RECORD KEEPING

We will maintain appropriate records regarding each step in the process for dealing with the Protected Disclosure as set out in this Policy, including reports, communications, and other documents prepared in relation to the report or investigation. The method for documenting and reporting of findings will depend on the nature of the disclosure.

8.3 FALSE OR MISLEADING DISCLOSURES

In the event that information disclosed turns out to be incorrect, protection under this Policy and the Corporations Act will still be applied, provided you had reasonable grounds to suspect the disclosures were correct at the time they were made.

Any disclosures that are deliberately false or misleading, or where the discloser knew or ought reasonably to have known that the disclosure was incorrect, will not be afforded protection under this Policy. Such disclosures may result in disciplinary or legal action.

8.4 INVOLVEMENT IN REPORTED CONDUCT

This Policy does not protect you from disciplinary action or liability if you were involved in the conduct that you are reporting. However, voluntary reporting and full cooperation with an investigation may be considered as a mitigating factor when determining what action (if any) will be taken.

9. WHISTLEBLOWER SUPPORT AND PROTECTION

9.1 PROTECTION FOR WHISTLEBLOWERS

The protections set out in this section apply from when a disclosure of Reported Conduct is made to an Eligible Recipient under this Policy.

Individuals are also protected from administrative, civil and criminal liability in relation to the making of that report. The protections do not grant immunity for any misconduct a disclosure has engaged in that is revealed in their disclosure.

The Group will not take any action that causes detriment to an individual who makes a Protected Disclosure in accordance with this Policy, including but not limited to:

- Disciplinary actions;
- Dismissal;
- Alteration of position or duties to their disadvantage;
- Discrimination;
- Harassment;
- Intimidation;
- Damage to reputation, property, business or financial position; or
- Any other harm, injury, or damage.

Detrimental action does not include administrative action taken to protect an individual, provided it is reasonable, or managing the individual's unsatisfactory work performance in line with our reasonable performance expectations.

The Group's officers and employees are also prohibited from engaging in conduct that causes detriment (or threatens to cause detriment) to an individual who makes a Protected Disclosure in accordance with this Policy, including where they believe or suspect that an individual may be proposing to make a report.

If you suffer loss, damage or injury because of a report made under this Policy, you may be entitled to compensation or other orders through the Courts if the Group failed to take reasonable precautions or exercise due diligence to prevent such detriment.

You may wish to seek independent legal advice if you think that may be the case.

9.2 SUPPORT FOR WHISTLEBLOWERS

The Company is dedicated to ensuring the fair treatment of its employees who are mentioned in a disclosure and who qualify for protection.

Support will be afforded to Eligible Whistleblowers who make Protected Disclosures. This support may include:

- taking any reasonable steps necessary to reduce identified risks to the Eligible Whistleblower;
- permitting an Eligible Whistleblower to contact the WPO directly to discuss any concerns they have in relation to the Protected Disclosure;
- affording access to the Employee Assistance Program (**EAP**) to the Eligible Whistleblowers family or personal supports; or
- considering any reasonable request for support made by the Eligible Whistleblower.

9.3 SUPPORT FOR INDIVIDUALS MENTIONED IN A WHISTLEBLOWER DISCLOSURE

We are dedicated to ensuring the fair treatment of persons who are the subject of a Protected Disclosure. If you have allegations raised against you, you can expect that the Group will take reasonable and appropriate steps to protect your confidentiality.

If, as part of an investigation, the preliminary assessment determines that allegations are not supported, the fact that the investigation has been carried out, the results of the investigation and your identity will remain confidential.

If the preliminary assessment finds that a complete investigation is required, you, as the person subject to the allegations, will be:

- informed of the nature of allegations (where appropriate);
- given the opportunity to respond to the allegations before a final decision is made; and
- advised of the outcome of the investigation.

Immunity for misconduct will not be granted under this Policy.

10. GOVERNANCE, ROLES AND RESPONSIBILITIES

10.1 GOVERNANCE

The table below summarises key governance bodies and their roles in managing or overseeing AGIC's Whistleblowing Policy.

Role	Responsibilities
AGIC Board Chair	<ul style="list-style-type: none">• Oversee and monitor this Policy, including through the review of any reports or escalations from the WPO.
AGIC Board	<ul style="list-style-type: none">• Oversee and monitor this Policy, including through the review of any reports from the WPO.• Ensure that the Policy is approved by the AGIC Board and reviews of the framework are undertaken as reasonably necessary.• Ensure that endorsement from IA ExCo Risk Committee and AGIC Board Risk Committee and CTM Board is obtained following any review.
AGIC Board Risk Committee	<ul style="list-style-type: none">• Review whether trends, themes or emerging risks highlighted by disclosures are being addressed and mitigated.• Consider and endorse (as appropriate) changes to this Policy.

10.2 ROLES AND RESPONSIBILITIES

The table below summarises the key roles and responsibilities in managing or overseeing this Policy:

Role	Responsibilities
Director	<ul style="list-style-type: none"> Eligible to receive Protected Disclosures but it is recommended to direct the Whistleblower to the Whistleblower Protection Officer. If receiving a disclosure, ensure the matter remains confidential.
Group Chief People Officer and Whistleblower Protection Officer (WPO)	<ul style="list-style-type: none"> Provide reports to the AGH, ISU, CTM, CIS, PHIS and AGIC Boards regarding the effectiveness of this Policy and de-identified reports made under it, as reasonably necessary to monitor compliance and effectiveness of the framework and while maintaining confidentiality. Recommend any changes to the framework, as appropriate, to the AGIC Board for approval, and implement any approved changes. Review this Policy annually.
People and Culture Representative	<ul style="list-style-type: none"> Conduct investigations under the direction of the WPO in line with this Policy.
All Employees	<ul style="list-style-type: none"> Be aware of this Whistleblower Policy and follow its requirements and the guidelines provided within.

11. COMPLIANCE

Policy non-compliance must be reported via the Incident Management process or via email to riskadvice@autogeneral.com.au.

Instances of wilful or deliberate breaches of this policy may lead to disciplinary action under the Code of Conduct, up to and including termination of employment. Some breaches of this policy may constitute a criminal offence.

If it is believed a person has acted contrary to the terms of this Policy, you may raise the matter directly with the WPO. You are also free to seek independent legal advice or lodge a complaint with ASIC, ATO or APRA if you believe you have suffered detriment (including suffering a breach of confidentiality) in relation to a report made, or to be made, under this Policy.

This Policy will be made available to Group employees through the intranet and employee training. A version of this Policy will also be made available to others entitled to make reports under this Policy through the Auto & General external Website.

12. CHANGE MANAGEMENT

APPROVAL DATE	VERSION No.	NATURE OF THE CHANGES	APPROVER
Jan 2022	3.0	Periodic review as required by policy.	AGIC Board
Oct 2024	4.0	Periodic review as required by policy.	AGIC Board
31 Oct 2025	5.0	Periodic review as required by policy.	AGIC Board

APPENDIX A: RELATED DOCUMENTS

The following are the key related documents supporting this Policy:

- Fit & Proper Policy;
- Corporations Act 2001;
- Disputes & Grievances Policy;
- Gifts and Benefits Policy; and
- Managing Underperformance & Inappropriate Workplace Behaviour Policy.

APPENDIX B: DEFINITIONS

Accountable Owner: The “Accountable Owner” of the policy is required to be the relevant Accountable Person at the senior executive level, in line with the Group’s Financial Accountability Regime (FAR) requirements.

Auto & General Insurance Company Limited (AGIC): AGIC is the ultimate underwriter of Insurance products across the Group and for its key distribution partners. In this document a reference to AGIC is also a reference to AGIC in its capacity as head of the Group.

Board or AGIC Board: A reference to the AGIC Board or Board refers to the AGIC Board, unless specifically noted otherwise.

Corporations Act: Means *Corporations Act 2001* (Cth) and its regulations, as amended from time to time.

Director: Has the meaning as defined in section 9AC of the Corporations Act 2001, being: (1) A director of a company or other body is:

- (a) a person who:
 - (i) is appointed to the position of a director; or
 - (ii) is appointed to the position of an alternate director and is acting in that capacity; regardless of the name that is given to their position; and
- (b) unless the contrary intention appears, a person who is not validly appointed as a director if:
 - (i) they act in the position of a director; or
 - (ii) the directors of the company or body are accustomed to act in accordance with the person's instructions or wishes (excluding advice given by the person in the proper performance of functions attaching to the person's professional capacity or their business relationship with the directors or the corporation).

Eligible Whistleblower: Is the class of individuals defined in section 6.1.

Employee: An employee of the Group. Also referred to as ‘you’ in this policy.

Grievance: A complaint made by an individual regarding some specific aspect of their employment, the policies and practices of the Company, the actions, conduct or behaviour of another employee or associate, or Workplace Health and Safety issue.

Group: In this document a reference to the Group is a reference to:

- (a) entities within the Level 2 Group, consisting of the following entities:
 - (i) Auto and General Insurance Company Limited (**AGIC**);
 - (ii) Auto and General Holdings Limited Pty Ltd (**AGH**)
 - (iii) Auto and General Services Pty Ltd (**AGS**);
 - (iv) Compare the Market Pty Ltd (**CTM**).

Officer: Has the meaning as defined in section 9AD of the Corporations Act 2001, being: (1) An officer of a corporation (other than a CCIV) is:

- (a) A director or secretary of the corporation; or
- (b) A person:
 - (i) Who makes, or participates in making, decisions that affect the whole, or a substantial part, of the business of the corporation; or
 - (ii) Who has the capacity to affect significantly the corporation's financial standing; or
 - (iii) In accordance with whose instructions or wishes the directors of the corporation are accustomed to act (excluding advice given by the person in the proper performance of functions attaching to the person's professional capacity or their business relationship with the directors or the corporation); or
- (c) A receiver, or receiver and manager, of the property of the corporation; or

- (d) An administrator of the corporation; or
- (e) An administrator of a deed of company arrangement executed by the corporation; or
- (f) A restructuring practitioner for the corporation; or
- (g) A restructuring practitioner for a restructuring plan made by the corporation; or
- (h) A liquidator of the corporation; or
- (i) A trustee or other person administering a compromise or arrangement made between the corporation and someone else.

People & Culture Representative: A nominated member of the People & Culture team, most likely from the People Services team.

Reportable Conduct: Is the conduct defined in section 6.2.

Responsible Person: Under APRA's purview is an individual who holds a position of significant influence or authority within an APRA-regulated entity. This individual would have responsibilities that directly impact the entity's compliance with APRA's prudential standards. A Responsible Person is defined by the Group as:

- any legal Director of any company within the AGIC Level 2 Group;
- the Appointed Auditor;
- the Appointed Actuary;
- a Senior Manager in relation to the Group who:
 - makes, or participates in making, decisions that affect the whole, or a substantial part, of the business of the Group; or
 - has the capacity to affect significantly the Group's financial standing; or
 - may materially affect the whole, or a substantial part, of the Group's business or its financial standing through their responsibility for:
 - enforcing policies and implementing strategies approved by the Boards of the Group; or
 - the development and implementation of systems that identify, assess, manage or monitor risks in relation to the Group's business; or
 - monitoring the appropriateness, adequacy and effectiveness of the Group's risk management systems; and
- any person determined in writing by APRA, ASIC or the AGIC Board to be a Responsible Person of the Group.

Senior Managers are defined by the Group as:

- any roles reporting directly to the Group CEO and MD;
- General Manager of Internal Audit; and
- a member of the Insurance Australia Senior Executive Team.

Definition and documentation of competencies for each Responsible Person are contained within the individual's position description.

Whistleblower: An eligible person who discloses information about suspected concerns of misconduct, wrongdoing or an improper state of affairs or circumstance in relation to the Company and qualifies for protection under the Corporations Act.

Whistleblower Legislative Framework: Means the following pieces of legislation:

- (a) the Corporations Act;
- (b) the *Australian Securities and Investments Commission Act 2001* (Cth);
- (c) the *Banking Act 1959* (Cth);
- (d) the *Financial Sector (Collection of Data) Act 2001* (Cth);
- (e) the *Insurance Act 1973* (Cth);
- (f) the *Life Insurance Act 1995* (Cth);
- (g) the *National Consumer Credit Protection Act 2009* (Cth); or
- (h) the *Superannuation Industry (Supervision) Act 1993* (Cth).