



COMPANY:	Experience Co Limited and all Group Companies (the Company / Experience Co/ EXP / Group)
TITLE:	Whistle-blower Policy
DEPARTMENT:	Human Resources
ISSUE DATE:	September 2019

PURPOSE

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

Management and the Board of Directors of Experience Co have adopted this policy with the aim to encourage all persons to report any wrongdoing in good faith and in an environment free from victimisation so that the Board and Senior Management can address any improper conduct. A copy of this policy is available on the Company's website at www.experienceco.com.

COVERAGE

This policy applies to all current and former employees, contractors, officers and directors of the Company and any family member of current and former employees, contractors, officers and directors of the Company (whistleblower/person/s).

WHAT IS WRONGDOING?

Wrongdoing examples include but are not limited to:

- A breach of laws or regulations;
- Dishonest, corrupt, fraudulent, or other illegal or unethical conduct or activity including soliciting, accepting or offering a bribe;
- Impeding internal or external audit processes;
- Improper behaviour relating to accounting, internal accounting controls, actuarial or audit matters;
- Conduct endangering health and safety;
- Conduct that is contrary to, or in breach of, Experience Co's Codes and Policies;
- Conduct involving substantial risk to the environment;
- A substantial mismanagement of Experience Co's resources;
- Conduct that is detrimental to Experience Co's financial position or reputation;
- Conflicts of interest;
- Concealment of wrongdoing;
- Sexual harassment;
- Bullying, discrimination, harassment or vilification.

HOW DO I REPORT WRONGDOING?

Any person who has reasonable grounds to suspect that any wrongdoing has occurred can report wrongdoing through:

1. Their 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 senior management directly or with Human Resources within Experience Co.

or

2. 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

Any person reporting wrongdoing either to their Manager or the relevant support area can be assured that they will be protected and that the investigation will be conducted in accordance with the principles of fairness and natural justice. Any employees involved in the investigation must treat the matter confidentially.

This policy does not prevent any person from reporting wrongdoing to a regulator under any applicable law.

The Whistleblower may or may not wish to remain anonymous when making the report. However, it should be noted that in order for a Whistleblower to obtain protection under the Corporations Act the Whistleblower must provide their name prior to providing the information. Consideration will be given at the time as to whether an anonymous report can be accepted having regards to the nature of the allegations made.

INVESTIGATING WRONGDOING

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.

Following completion of an investigation, and where appropriate having regard to the circumstances (including privacy rights and confidentiality obligations), the Whistleblower will be informed of the outcome of the investigation.

It is a breach of this policy and Experience Co forbids any employee from penalizing 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 damage the person.

BREACH

Adherence to this Policy is a condition of employment and / or terms of contract at Experience Co. Breaches may be subject to disciplinary action including termination of employment or contract, as appropriate.

REVIEW

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