



INLOOP GROUP

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# Whistleblower Statement



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# 1. Purpose and Scope

## 1.1 Purpose of this Statement and Senior Management Commitment

This Whistleblower Statement (Statement) supports the InLoop Group's commitment to conducting our business with honesty and integrity. It provides people guidance on how to raise a concern about suspected or actual unlawful or improper behaviour. For the purpose of this Statement, we will refer to an individual who speaks up in this manner as a "Whistleblower".

InLoop's senior management is committed to protecting the reputation, dignity and wellbeing of anyone who reports wrongdoing, as well as ensuring that any reports under this statement are treated seriously and investigated carefully.

This Statement tells you how you can make a report, and the protection you can expect to receive if you do.

For the purpose of this Statement, a reference to InLoop or the InLoop Group is a reference to InLoop Ptd Ltd (ABN 27 114 508 771) and any Related Body Corporate of InLoop (as that term is defined in the Australian Corporations Act). The InLoop Group entities include Flexischools (ABN 27 114 508 771), Lantern Claims Pty Limited trading as LanternPay (ABN 28 606 978 796), and Nuonic Pty Ltd (ABN 76 613 269 364).

## 1.2 Who does this Statement apply to?

Our Statement applies to all members of the InLoop Group and includes all:

- current and former:
  - employees; whether casual, part-time or full-time;
  - interns or secondees;
  - Directors of the InLoop Group company boards;
  - suppliers; and/or
  - volunteers.

Relatives, spouses or dependents of any of the individuals above can also raise concerns in the ways set out in this Statement and receive the protections and assurances provided for in this Statement.

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# 2. General Process

## 2.1 What is the general process?

We are committed to protecting your identity and dignity. Whether you identify yourself or not, you may make a disclosure in the manner set out below. We will investigate all reports that are capable of investigation in accordance with this Statement. At the end of the investigation, the results will be documented and we will provide feedback as appropriate.

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## 3. Protected Disclosures

### 3.1 What disclosures are protected by this Statement?

To be protected by the law and this Statement, a disclosure must be about certain types of matters, and be reported in a certain way.

Disclosure reports should only be made if you have reasonable grounds to suspect that the information you have, or that you know, concerns misconduct or an improper state of affairs or circumstances in relation to an InLoop Group business. For the purpose of this statement, we will call this “Reportable Conduct”, and examples are below.

The information you may have could be about an InLoop company or could involve someone working for, or with, the InLoop Group who has engaged in conduct that breaches the law or represents a danger to the public or financial system.

#### Examples of Reportable Conduct

Reportable Conduct can be in the past, present or a likely future activity, and includes behaviours or states of affairs. Reportable Conduct includes your knowledge or reasonable suspicion of things like:

- fraud, dishonest activity or embezzlement (including where there is a dishonest altering of financial records or transaction details, or where someone deliberately transfers customer money into their personal bank account);
- deliberate or reckless breaching of our customers’ confidentiality;
- corruption (including soliciting, accepting or offering bribes, facilitation payments or other such benefits);
- illegal activity (including breach of any laws, theft, drug sale or use, violence and property damage);
- a wilful or serious breach of any internal policy or code;
- a significant or serious threat to health or safety;
- endangering the public or the financial system;
- impeding any internal or external audit process;
- a serious mismanagement of InLoop financial resources, or an activity that results in detrimental impact to InLoop’s financial position or reputation;
- improper conduct regarding accounting, internal controls, compliance, actuarial or other related matters; and
- hiding any Reportable Conduct.

### 3.2 How do you know you have reasonable grounds to suspect Reportable Conduct?

Reasonable grounds in this context means that a reasonable person in your position would also suspect the information you have indicates Reportable Conduct or a breach of the law. You should therefore at minimum ask yourself this question ahead of your disclosure.

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## 4. Reporting concerns

### 4.1 How can you report information?

If you have a concern about possible Reportable Conduct, there are a number of ways you can raise it.

#### **Current employees, interns/secondees, contractors or Directors:**

Where possible, you are encouraged to use normal business channels first for identified Reportable Conduct or issues relating to your own personal circumstances, except where you believe you may suffer personal disadvantage or wish to use the protections under this Statement.

You also have the right to:

- contact our dedicated Whistleblower Protection Officers, the details of which are in our Employee Handbook; or
- use the dedicated, confidential whistleblowing number specified in and in accordance with our Employee Handbook.

Finally, you have the right to make a disclosure anonymously in accordance with the details specified in the Employee Handbook.

#### **Former employees, contractors, interns/secondees, Directors, and current suppliers or service providers (or relatives or family members):**

You can use our dedicated, confidential whistleblowing reporting number as follows: (02) 8599-3270.

You have the right to make a disclosure anonymously. If you wish to do this, you should not disclose information that could reasonably identify you when you make your disclosure.

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## 5. Whistleblower Protections

### 5.1 What protections will a Whistleblower receive?

If you disclose a concern in accordance with this Statement, please know that:

- if a report is made anonymously, we will take steps to keep your data anonymous and to ensure your identity is protected in accordance with the law;
- no matter which method of disclosure is used, all information we receive will be treated sensitively and appropriately to the disclosure; and
- if you have reasonable grounds to suspect Reportable Conduct, even if it turns out your concerns are mistaken, we will take steps to support and protect you and anyone else assisting in the investigation.

### 5.2 Whistleblower Protection Officers

InLoop has Whistleblower Protection Officers, who are senior employees responsible for providing certain protections for individuals who are concerned that they may experience personal disadvantage as a result of speaking up.

Anyone covered by this Statement may approach the Whistleblower Protection Officer. The Whistleblower Protection Officers are listed in the Employee Handbook. Alternatively, please contact InLoop through the reporting channels we've mentioned in this Statement if you are not currently within the InLoop Group and would like the contact details of our Whistleblower Protection Officer.

## 5.3 How will InLoop protect your information?

You can choose to remain anonymous but disclosing your identity may help us get further information relating to your disclosure that we need for an investigation.

If you choose to disclose your identity, your details will only be used in connection with the specific investigation and your identity will not be disclosed to anyone else unless:

- InLoop is legally obliged to disclose your identity;
- the disclosure is required if and when InLoop decides to report to relevant regulatory or police authorities;
- the disclosure is necessary to prevent or lessen a threat to a person's health, safety or welfare; or
- you consent in writing for us to share the information.

All information received from you, as well as the fact that you have made a disclosure, will be held securely and remain strictly confidential.

If you implicate your own conduct in your disclosure, you will not be given immunity from investigation, disciplinary action, criminal prosecution and/or civil liability. The same applies to anyone assisting in an investigation.

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# 6. Relevant Information

## 6.1 What information do you need to give in your disclosure?

Whether you choose to remain anonymous, or identify yourself in your disclosure report, it is important that you give us enough information to enable an investigation to start.

The kind of information your disclosure should contain includes:

- date, time, and location of any event that took place;
- the name of parties or individuals involved;
- anyone who might have seen or knows what happened;
- any documents that might be available to help the investigation; and/or
- anything you may already have done to try and resolve or raise concerns about the matter before using the whistleblowing process.

## 6.2 What do we do with your information after you provide it?

An "Investigation Officer" will be appointed from inside, or outside our organisation as appropriate. Where the disclosure has been made to a Whistleblower Protection Officer, and the Whistleblower wishes to have their identity kept anonymous, this initial investigation will be conducted by the Whistleblower Protection Officer(s).

The Investigation Officer will conduct a preliminary review of the information that has been reported. If the preliminary review identifies that a full investigation is warranted under the circumstances, an investigation will be conducted.

The time taken to complete the preliminary review and any subsequent investigation will depend on the nature of the report and the amount of information that is provided. All reasonable efforts will be made to have preliminary reviews and any investigations completed as soon as possible in the circumstances.

Please note that not all disclosure reports will result in a full investigation.

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## 7. Out of Scope Information

### 7.1 What information is not relevant to your disclosure or this Statement?

Information not relevant to this Statement includes your personal grievances and any customer complaints.

#### Personal Grievances

Personal, work-related complaints (including after your time in the InLoop Group) are not covered by this Statement, and instead should be raised by using our contact numbers or emails available through the Employee Handbook or our Contact section on our applicable website (as appropriate).

Examples of a personal, work-related complaint include:

- a conflict between you and another employee;
- a decision that was made about someone being promoted, hired, or transferred; and/or
- a complaint you have about the terms or conditions of your engagement with InLoop.

#### Customer Complaints

This Statement doesn't relate to customer complaints or concerns about InLoop Group services, its staff or contractors. Customers may raise their concerns through the relevant support contact channels, including those found on the applicable InLoop website.

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## 8. Communication

### How will InLoop keep Whistleblowers informed?

If the Whistleblower makes their identity known, the following terms apply.

If the Whistleblower asks, the preliminary review referenced above (and any subsequent investigation) may include reports to the individual who raised the concern. How regular those reports are will depend on the nature of the investigation and the disclosure that was made.

You may be provided with further feedback, subject to privacy and confidentiality rights of any individual under investigation or other InLoop Group confidentiality or security requirements.

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## 9. Variations

This Statement may be varied from time to time, so please check our website periodically for any changes.