

Policy Statement

The Affinity Education Group Pty Ltd and its related entities (collectively 'AEG') recognise that commitment to detecting and preventing illegal behaviour and undesirable conduct must include a mechanism in which employees and others can raise concerns confidentially, freely, and without fear of reprimand, victimisation, or discrimination. This Whistleblower Policy provides a reporting mechanism and encourages a culture of reporting poor conduct throughout the organisation where there is a supportive environment in which individuals to which the scope of this policy applies (**Whistleblowers**) are encouraged to report actual, suspected or potential serious wrongdoing they believe is occurring or may occur within AEG.

Purpose & Objectives

The purpose of this policy is to outline the governance and reporting processes which AEG have adopted to achieve the right outcomes for children, families, and our people. AEG is committed to conducting business responsibly, with honesty and integrity, and encourages a culture of openness and accountability in compliance with all applicable laws and regulations.

The objectives of this policy are to:

- Encourage disclosures of potential misconduct.
- Ensure individuals who disclose can do so safely, securely, and with confidence they will be protected and supported.
- Ensure that disclosures are dealt with appropriately and in a timely manner.
- Provide transparency around AEG's framework for receiving, handling, and investigating disclosures.
- Meet AEG's legal and regulatory obligations.

AEG will not tolerate victimisation or discrimination towards any person for raising concerns or reporting potential misconduct where they have reasonable grounds to suspect that serious wrongdoing has taken place. Decisions concerning disclosures will not be influenced by race, sex, pregnancy or potential pregnancy, sexual orientation, gender identity/expression/history, transgender or transsexual status, political belief or activity, religion, marital status, caring responsibilities, parental status, breastfeeding, irrelevant criminal or medical record, national or ethnic origin, disability, age, citizenship or membership of a representative body, except where required or justified by any applicable laws.

Disciplinary action may be imposed on anyone shown to have caused detriment to a person because they want to, or have raised a concern, or made a disclosure.

Scope of Policy

This policy applies to anyone with information about actual, suspected or potential serious misconduct and is encouraged to raise concerns.

This policy applies to an individual who is:

- An AEG current or former director or employee including employees who are permanent, part-time, fixed term, temporary, volunteers, and consultants.
- A relative, dependant, or spouse of the above people.
- A family member of a child in AEG's care.
- Eligible to report under the *Corporations Act 2001* (Cth).

Policy Principles and Requirements

1. Potential Misconduct

AEG encourages any individual to which the scope of this policy applies to raise concerns about actual, suspected or potential serious misconduct (**Protected Disclosure**). Individuals will be expected to have reasonable grounds to suspect the information is true and accurate. Reports must not be made if they are knowingly untrue, malicious or misleading.

AEG also supports and will comply with all statutory protections that are made available to Whistleblowers from time to time.

Accountable (Owner)	General Counsel	Accountable (Expert)	Chief Risk & Quality Officer
Responsible	All staff, students, volunteers, families	Document Version	V6.0
Consulted	People teams, Legal, Risk, Finance	Date Approved	Jan 2026
Informed	All staff, students, volunteers	Date next reviewed	Jan 2027

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Examples of potential misconduct:

- Health and safety risks, including risks to children, employees, contractors, children's families.
- Concerns about quality of care at AEG's services.
- Sexual misconduct, grooming or predatory behaviour.
- Bullying and/or harassment.
- Bribes, kickbacks or theft.
- Fraud, dishonesty or corruption.
- Questionable financial accounting or tax arrangements.
- Information security breaches.
- Breaches of law (including the *Education and Care Services National Law and National Regulations*).
- Serious breaches of AEG policies and processes.
- Modern slavery or money laundering concerns.
- Environmental concerns or risks to public health and safety.
- Actual or potential material conflicts of interest.
- Anti-competitive behaviour.
- Use of or dealing in drugs.
- Other dishonest, illegal or unethical conduct.
- Concerns about wrongdoing, misconduct or risk of harm in AEG's supply chain, i.e. by those individuals/organisations providing goods and/or services to AEG.
- Actions intended to deliberately hide or conceal any of the above.

2. Personal Work-Related Grievances

Concerns relating to personal work-related grievances, which do not relate to detriment or threat to detriment by the person making the concern, are not covered by this policy and should be reported to the People & Culture team.

Examples of personal work-related grievances include:

- An interpersonal conflict between employees.
- A decision that does not involve a breach of workplace law.
- A decision about performance, engagement, transfer, or promotion.
- A decision to suspend or terminate employment.

However, if the personal work-related grievance includes information about a potential misconduct, or suggests misconduct beyond personal circumstances, the personal work-related grievance may qualify for Whistleblower protections under this policy.

Examples may include:

- Concerns detriment to a person because they have or may be considering making a Protected Disclosure.
- Concerns are raised to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the law about Whistleblowers.
- Information has significant implications for AEG that do not relate to the discloser.
- Concerns conduct, or alleged conduct, in contravention of specified corporate law or that constitutes an offence punishable by 12 months or more imprisonment under any state or Commonwealth laws.

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How to Report

Actual, suspected or potential serious misconduct that may be a Protected Disclosure (and is not a personal work-related grievance), can be reported to whistleblower@affinityeducation.com.au.

Concerns can also be raised directly to:

- General Counsel, Paul Kelly (paul.kelly@affinityeducation.com.au)
- Chief Risk & Quality Officer, Nicola Page (Nicola.page@affinityeducation.com.au)

Concerns may also be raised confidentially, or anonymously, by reporting by telephone to the Chief Risk & Quality Officer or General Counsel at 07 3555 7773.

If it is considered inappropriate to report to the Chief Risk & Quality Officer or General Counsel, the Whistleblower is encouraged to report their reasonable suspicion to the Board Chair, CEO, a member of the Executive Team or to AEG's external auditors.

Investigation

All investigations will be carried out in a confidential, fair, objective, and timely manner, and may require specialist investigator(s) depending on the concern(s) raised. The length of time needed to investigate will depend on the concern(s) raised and its complexity. AEG will take reasonable steps to maintain the Whistleblower's identity and confidentiality. AEG must obtain written consent from the Whistleblower prior to sharing any information such as their name or information that may disclose their identity unless disclosure is authorised or required by law. AEG must disclose to the Whistleblower to whom their identity or information will be shared with and why. AEG may also disclose information where the disclosure is necessary to facilitate further investigation of the report. AEG will take reasonable steps to keep a Whistleblower's identity confidential and reduce the risk of disclosure in the course of an investigation if the concern is raised with an external lawyer for the purpose of obtaining legal advice, or the concern is reported to ASIC, APRA or other relevant government body.

Adequate and relevant records will be securely kept in accordance with AEG record retention policies and procedures. These may include but will not be limited to investigatory notes, witness statements, minutes of meetings, mails, notes of telephone calls and copies of correspondence. These records will be kept in an organised and confidential manner.

At the end of the investigation process, the Whistleblower will be informed the investigation has been finalised and, where appropriate, informed of any outcome.

To ensure procedural fairness, it may be necessary to disclose the fact and/or substance of a report to any person who may be the subject of the report and allow them an opportunity to respond. All investigations will be objective, fair and independent, and will be undertaken in a timely fashion.

The investigator(s) may make recommendations to minimise risk of future potential misconduct and AEG is committed to implementing such findings and recommendations.

Protection & Support

AEG encourages openness and will support people who raise genuine concerns under this policy, even if they turn out to be mistaken.

AEG does not accept detrimental treatment or victimisation of any person who raises or takes part in the investigation of a genuine concern or potential misconduct.

Detrimental treatment includes:

- Dismissal.
- Disciplinary action.

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- Alteration of an employee's position or duties to his or her disadvantage.
- Bullying, harassment, or intimidation of a person.
- Harm or injury to a person, including psychological harm.
- Damage to the person's reputation.
- Threats and any other poor treatment connected with raising concerns.

If a Whistleblower believes they have been the subject of actual or threatened victimisation or other retaliatory action, they are encouraged to report the matter.

If a Whistleblower has engaged in wrongdoing that is the subject of their report, or otherwise, the fact that the Whistleblower has made the report will not protect them from potential disciplinary action, which will not be considered retaliation or victimisation.

Reporting

Findings of investigations will be reported directly to the Board Chair and to the Board Risk & Safety Committee.

In cases where the Board Chair, CEO, or any Executive Team member have been accused of reportable conduct, or where they have a close personal relationship with the person against whom the accusation is made, they will be excluded from the reporting process.

Understanding & Accessibility

This policy will be made available on AEGs website and will be effective from the date of posting. The policy may be made available in other languages upon request to AEGs General Counsel or Chief Risk & Quality Officer.

Review

This policy will be reviewed at a minimum annually and tabled at AEGs Board. The review will include an assessment of the operation and effectiveness of AEGs whistleblower programme and if any recommendations or changes to the programme are required.

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