



Whistleblowing Policy (Australia)

This Whistleblowing Policy (“this Policy”) documents Experian’s commitment to maintaining a working environment that encourages **Eligible Whistleblowers** to speak up about **Reportable Conduct** without being subject to retribution, victimisation, harassment and/or discriminatory treatment.

Key Policy Principles:

This Policy aims to:

- Encourage Eligible Whistleblowers (as defined in 2.1.1.1 below) to promptly report Reportable Conduct (as defined in 2.1.1.3 below) if they have reasonable grounds to do so;
- Outlines how Experian will deal with and investigate Reportable Conduct;
- Sets out the avenues available to Eligible Whistleblowers to report Reportable Conduct; and
- Sets out how Experian will afford fair treatment to Eligible Whistleblowers and any person who is involved in the Whistleblowing disclosure

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1. Policy Statement

1.1. Policy Purpose

Experian is committed to achieving the highest possible standards of quality, honesty, openness, and accountability in everything we do. We expect all Experian staff to maintain high standards in accordance with our [Global Code of Conduct](#).

However, we recognise that all organisations face the risk of things going wrong from time to time. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them in a manner that is fair, prompt, sensitive and confidential (to the extent possible) when they do occur.

We encourage all of our people to raise any concerns about the way in which we run our business at an early stage so that we can deal with those concerns effectively and will provide the appropriate protections to those involved in the Whistleblowing process. These concerns may include but are not limited to: activities detrimental to consumers or our clients; serious breaches of Experian policies and regulations; information security threats; victimisation, harassment, or bullying; criminal activity; modern slavery; and fraud.

This Policy does not cover the reporting of matters that are generally regarded as Personal Work-Related Grievances (see section 2.1.2 below).

This Policy may be revised at any time without prior notice. Experian reserves the right to amend this Policy from time to time and will review this Policy annually or at such other reasonable intervals to ensure that this Policy remains effective and relevant to Experian, and that it continues to comply with all relevant legislative requirements. All published Policy revisions will supersede the prior Policy principles/requirements and are effective on the publication date.

1.2. Policy Scope

This Whistleblower Policy ("this Policy") documents Experian's commitment to maintaining a working environment that encourages Eligible Whistleblowers (as defined in 2.1.1.1 below) to speak up about Reportable Conduct (as defined in 2.1.1.3 below) without being subject to retribution, victimisation, harassment and/or discriminatory treatment.

This Policy aims to:

- encourage Eligible Whistleblowers to promptly report Reportable Conduct if they have reasonable grounds to do so;
- outlines how Experian will deal with and investigate Reportable Conduct;
- sets out the avenues available to Eligible Whistleblowers to report Reportable Conduct; and
- sets out how Experian will afford fair treatment to Whistleblowers and any person who is involved in a Whistleblowing disclosure.

Experian has created this Policy, together with associated controls, procedures and oversight, to ensure the Policy objectives are achieved.

1.3. Target Audience

This Policy applies in Australia to Experian and all of its business units and covers Eligible Whistleblowers (as defined in 2.1.1.1 below). Any Eligible Whistleblower may raise concerns regarding Reportable Conduct (as defined in 2.1.1.3 below) under this Policy.

2. Policy Principles

2.1. Key Policy Principles

2.1.1. What is Whistleblowing?

2.1.1.1. Eligible Whistleblower

An “**Eligible Whistleblower**” is a person who raises a concern that they have reasonable grounds to suspect is Reportable Conduct (as defined in 2.1.1.3 below). An **Eligible Whistleblower** includes all current and past Experian:

- officers (including directors and company secretaries);
- employees;
- Associates (as defined in the Corporations Act) including directors and company secretaries of any Experian Related Body Corporate;
- contractors, suppliers of good or services (and their current and former employees); and
- relatives and dependents of any of the above

2.1.1.2. Whistleblowing

“**Whistleblowing**” is the disclosure of information where the Eligible Whistleblower has reasonable grounds to suspect that there is or has been Reportable Conduct.

This may include:

- Activities that may cause consumer harm
- Serious breaches of Experian policies and regulations
- Information security threats
- Victimisation, harassment, or bullying
- Criminal activity
- Modern slavery
- Fraud
- Health & Safety concerns
- Any activity which goes against Experian’s Supplier Code of Conduct
- The deliberate concealment of any of the above matters.

‘Reasonable grounds’ means that a reasonable person in your position would also suspect the information indicates misconduct or a breach of the law.

Experian encourages and relies on Eligible Whistleblowers who are aware or suspect Reportable Conduct to promptly report any Reportable Conduct and follow the processes set out in this Policy.

2.1.1.3. Reportable Conduct

“**Reportable Conduct**” includes the types of conduct or information that may be reported under the Corporations Act 2001 (Cth) (Corporations Act) and the Taxation Administration Act 1953 (Cth) (Taxation Administration Act) (“Acts”) or under this Policy being:

- any misconduct or an improper state of affairs or circumstances in relation to Experian or a Related Body Corporate of Experian (examples include, but not limited to, fraudulent activity, dishonest or corrupt behaviour, mismanagement of company resources, conduct endangering health or safety, concealment of wrongdoing);
- conduct where a Whistleblower has reasonable grounds to suspect that Experian or a Related Body Corporate of Experian or its employees, directors, officers, suppliers, customers or contractors have engaged in conduct or alleged conduct which:
 - represents a danger to the public or the financial system;
 - constitutes an offence against any Commonwealth Act that is punishable by imprisonment for a period of 12 months or more;
 - constitutes an offence or contravention of Relevant Acts (as defined below); or
 - is otherwise prescribed by regulations under Relevant Acts to be Reportable Conduct; and

The eligible whistleblower may assist Experian to perform its functions or duties in relation to those tax affairs.

“Relevant Acts” means the Corporations Act, the Australian Securities and Investments Commission Act 2001, the Banking Act 1959, the Financial Sector (Collection of Data) Act 2001, the Insurance Act 1973, the Life Insurance Act 1995, the National Consumer Credit Protection Act 2009, the Superannuation Industry (Supervision) Act 1993, Competition and Consumer Act 2010, the Taxation Administration Act 1953, other tax laws administered by the Federal Commissioner of Taxation, any other Commonwealth law that is punishable by imprisonment for a period of 12 months or more. Reportable Conduct can relate to conduct of third parties, such as customers, suppliers or services providers.

Reportable Conduct does not need to involve a contravention of a particular law. For example, information that indicates a significant risk to public safety or the stability of, or confidence in, the financial system, is also Reportable Conduct, even if it does not involve a breach of any particular law. There must be some supporting information for the suspicion, and not a mere allegation.

2.1.2. Personal Work-Related Grievances

This Policy does not cover “Personal Work-Related Grievances” which means and includes any matter relating to the discloser’s employment or former employment which has or tends to have implications for the discloser personally, including but not limited to:

- interpersonal conflict between a discloser and another employee;
- decisions relating to the engagement, transfer or promotion of the discloser;
- decisions relating to the terms and conditions of engagement of the discloser; or
- decisions relating to the disciplinary treatment, suspension or termination of employment/engagement of the discloser.

However, Personal Work-Related Grievances may be Reportable Conduct and may qualify for protection where:

- the disclosure of the grievance has significant implications for Experian and also includes
- information about Reportable Conduct;
- the Eligible Whistleblower suffers from (or is threatened with) detriment for making
- a disclosure or assisting in the investigation of a disclosure;
- is a mixed report that includes Reportable Information and a Personal Work-related Grievance; or
- relates to information suggesting misconduct beyond the Eligible Whistleblower’s circumstances.

If you are an Experian employee and wish to raise a concern about personal work-related grievances, please refer the matter to your Manager or Human Resources team member.

2.1.3. How to Raise a Concern

We are committed to addressing your disclosure concerns and providing you with respect and fair treatment.

2.1.3.1. Raising Concerns Internally

If the Eligible Whistleblower is not sure whether to report Reportable Conduct or not, the Eligible Whistleblower is able to first discuss the matter with an Eligible Recipient before making a disclosure of Reportable Conduct and this discussion can be undertaken anonymously, if the Eligible Whistleblower prefers.

Eligible Whistleblowers can make a disclosure of Reportable Conduct to any of the Eligible Recipients mentioned below.

N.B.: A disclosure of Reportable Conduct which is not made directly to an Eligible Recipient identified in this Policy above may not qualify for protection under the Acts.

2.1.3.1.1. Internal Eligible Recipients

Experian’s internal Eligible Recipients include:

- any of Experian’s officers (which includes directors and company secretaries);
- Experian ANZ’s senior managers, which includes a person, other than a director or company secretary, who makes, or participates in making, decisions that affect the whole, or a substantial part of Experian ANZ’s

business, or has the capacity to significantly affect Experian ANZ's financial standing, such as any member of the Experian ANZ Senior Leadership Team;

- The Regional Head of Internal Audit or any member of the Internal Audit team;
- Experian's internal actuaries (if any);
- if the disclosure relates to a tax matter, in addition to any of the above, individuals within Experian dealing with tax matters;
- an Experian Board member;
- any other senior Experian employees appointed from time to time and as communicated by Experian.

For Experian employees:

- if the issue you want to report is about your manager, a member of the Experian ANZ Executive Leadership Team or a Human Resources team member, you may report the matter to the Experian ANZ Chief Legal Officer and/or Experian ANZ Chief Executive Officer and/or the Regional Head of Internal Audit.
- if the issue you want to report is about the Experian ANZ Chief Legal Officer you may report the matter to the Experian ANZ Chief Executive Officer and/or another Board member and/or the Regional Head of Internal Audit.
- if the issue you want to report is about the Experian ANZ Chief Executive Officer, you may report the matter to the Experian ANZ Chief Legal Officer and/or the EMAP Regional Chief Executive Officer and/or or another Board member and/or the Regional Head of Internal Audit.

Experian's Eligible Recipients are required to comply with the terms of this Policy, including keeping the identity of the Whistleblower confidential (unless an exception applies) and providing such support as is necessary (including if requested providing a support person) in the conduct of undertaking a Whistleblower investigation.

2.1.3.2. Confidential Helpline – Navex Global

If you still have concerns, or you feel unable to contact anyone internally, then please call our Confidential Helpline. The Confidential Helpline is available all day, every day and we have appointed **Navex Global** to operate it for us. Navex Global is an independent group with staff professionally trained in recording whistleblowing concerns. Navex Global will treat and log your concern in strictest confidence. The call will be free from a landline, but local mobile / cell providers may charge. Alternatively, you can submit a written report using Navex Global web reporting – this will be fully investigated in the same manner as a call:

Reporting and Whistleblowing Service Channels		
Telephone	1800 512 411	This is a toll-free number
Online platform	experian.ethicspoint.com	The online platform can be accessed via a computer or a smart phone
Email	whistleblowing@experian.com	This email address is monitored by a limited number of Global Internal Audit staff and may be used to raise concerns regarding the whistleblowing process or the handling of a specific disclosure. It is important to note that this channel should not be used as a substitute for the Confidential Helpline, which remains the primary channel for raising Reportable Conduct concerns.

If an Eligible Whistleblower does not want to use the Confidential Helpline, they can alternatively report Reportable Conduct directly (either orally or in writing) to one of Experian's Internal Eligible Recipients.

2.1.3.3. External Eligible Recipients

Eligible Whistleblowers may also report Reportable Conduct to the following external Eligible Recipients:

- Experian's auditors (KPMG) and registered tax agent (Ernst & Young);
- A legal practitioner for the purpose of obtaining legal advice;

- Australian Securities and Investments Commission (ASIC) - see link:
 - <https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/>;
- Australian Prudential Regulation Authority (APRA) - see link:
 - <https://www.apra.gov.au/become-a-whistleblower-or-make-a-public-interest-disclosure> or another prescribed Commonwealth authority; or
- Tax related disclosure may also be made to the Australian Taxation Office (ATO) - see link:
 - <https://www.ato.gov.au/general/gen/whistleblowers/>.

Whilst Reportable Conduct may be made to external Eligible Recipients, Experian encourages Eligible Whistleblowers to use the Confidential Helpline in the first instance as this will allow Experian to promptly investigate, action and address the matters raised as part of a Reportable Conduct disclosure.

2.1.3.3.1. Public Interest & Emergency Disclosures

A further report may be made to a member of Commonwealth Parliament or a journalist on grounds of public interest and/or emergency, if the following conditions are met:

- the Whistleblower has previously made a disclosure report to ASIC, APRA or another prescribed Commonwealth authority; and
- if not an emergency disclosure, at least 90 days have passed since the date of the Whistleblower's original report; and
- the Whistleblower does not have reasonable grounds to believe that action is being, or has been, taken in respect of that report and has reasonable grounds to believe that making a further disclosure would be in the public interest ("**public interest disclosure**"); or
- the Whistleblower has reasonable grounds to believe the report concerns a substantial and imminent danger to the health or safety of one or more persons or the natural environment ("**emergency disclosure**"); and
- the Whistleblower has given prior written notice of the intention to make a secondary report to the original recipient of the report.

In such case the Eligible Whistleblower will be entitled to the protections conferred by law and Experian will take reasonable steps to ensure that an Eligible Whistleblower is not victimised as a result of making a protected public interest disclosure or an emergency disclosure.

Before an Eligible Whistleblower makes a public interest disclosure or an emergency disclosure, Experian recommends the Eligible Whistleblower first seek independent legal advice to ensure that the disclosure is protected under the Acts.

2.1.3.4. If Someone Tells You Not to Raise Your Concern

If someone at Experian tells you not to raise or pursue your concern, even a person in authority such as a manager, you must not agree to remain silent but instead report the matter to one of the Internal Eligible Recipients or to our Confidential Helpline. If you are a current or previous Experian employee, the confidentiality obligations in your employment contract do not prevent you from raising a concern if you do so in accordance with this Policy.

2.1.3.5. Confidentiality and Anonymity

We hope that you will feel able to voice whistleblowing concerns openly under this Policy. However, you may opt to make your concern known either confidentially or anonymously. An Eligible Whistleblower may also consent to partial or full disclosure of their identity.

- **Confidentiality** – in this scenario you provide your name when raising a concern, but the Eligible Recipient must keep the identity of a Whistleblower confidential at all times (unless an exception applies).
- **Anonymity** – A Whistleblowing report can be made anonymously. An Eligible Whistleblower can choose to remain anonymous while making a disclosure
 - The only way to remain truly anonymous would be to go through the Confidential Helpline and not provide your name. Navex Global will take down a written summary of your concern and provide you with access to receive future updates anonymously. Please note, however, that it may be difficult for Experian to properly investigate an anonymous report.

- Anonymous reporters will qualify for protection under the Corporations Act and Experian will continue to take all reasonable steps to ensure that the Eligible Whistleblower is treated fairly and protected against discrimination or detriment including in respect of their employment in the case of an employee.
- If a Regulator or other Government authority (“Authority”) takes further legal action in relation to a disclosure, it may become necessary for an Eligible Whistleblower to identify themselves to the relevant Authority.

If you are concerned about possible reprisals if your identity is revealed, we encourage you to use the Confidential Helpline or one of the Internal Eligible Recipients. They will take steps to preserve confidentiality but, in some situations, the law might require them to disclose your identity to a relevant Authority.

2.1.3.6. What Should a Report Include?

Reports should provide as much detail as possible to allow Experian to make full and proper inquiries into the Reportable Conduct, including:

- the Whistleblower’s name and contact details (or, if the report is anonymous and using the Navex reporting process, Navex will provide you with access to receive future updates anonymously via the online portal);
- a statement describing the Reportable Conduct;
- name of the person(s) involved;
- dates, times and locations;
- details of any relevant transactions;
- copies of any relevant documents;
- names of possible witnesses; and
- any steps already taken to report or address the matter

2.1.4. How Experian Handles Your Concern

2.1.4.1. Investigation and Outcome

Once a Reportable Conduct matter has been raised to an Eligible Recipient, it is logged in the Navex system (if that is not the route the matter was originally made through) and a decision will be made as to who will be appointed as the **Whistleblower Investigation Officer**. This decision will be made by the Regional Head of Internal Audit who may consult with the Eligible Recipient, Experian ANZ’s Chief Executive Officer, Experian ANZ’s Chief Legal Officer or the Chair of the Experian Audit Committee. A Whistleblower Investigation Officer will be a party that has a level of experience and understanding of the matter that allows them to conduct a thorough and impartial investigation into the matter raised. It is important to note that this may be any one of the following:

- A member of the Internal Audit function, which operates independently from the Australian business;
- a lawyer employed by Experian;
- a Human Resources employee;
- a Senior Business Leader;
- an external party such as a lawyer or other expert engaged for the specific investigation purpose; or
- another person nominated by the Regional Head of Internal Audit, Experian ANZ Chief Operating Officer, Experian ANZ Chief Legal Officer or the Chair of the Experian Audit Committee.

Where appropriate, Experian will aim to provide regular feedback to the Whistleblower regarding the investigation’s progress and/or outcome (subject to considerations of the privacy and confidentiality of those against whom the allegations are made). Communication is typically via the Navex online reporting feedback facility.

As a guide and depending on the nature of the allegations made, an initial review may generally be completed within six weeks of Experian’s receipt of a report under this Policy while further inquiries or investigations may take up to 12 weeks. However, timeframes for enquires or investigations will vary depending on the nature of the report and will be at Experian’s discretion. The investigation will be conducted in an objective and fair manner and otherwise as is reasonable and appropriate having regard to the nature of the Reportable Conduct and the circumstances.

An overview of the output from the Confidential Helpline is reported to the Enterprise Risk Management Committee (ERMC) and the Experian PLC Audit Committee so that they can assess the thematic trends of cases reported. At the conclusion of an investigation into Reportable Conduct, a confidential report will be added to the Navex reporting

system. Depending on the seriousness and nature of the matter, the Experian ANZ Chief Executive Officer, the Experian ANZ Chief Legal Officer, and Experian PLC's Board of Directors may also receive a copy of the report.

While feedback will be provided to the Whistleblower they will not receive a copy of the final report.

Substantiated Reportable Conduct may result in disciplinary action in respect of the persons against whom the substantiated allegations are made and may include termination of employment or engagement (as relevant).

2.1.4.1.1. If You Are Not Satisfied

While we cannot guarantee that the outcome of your whistleblowing will match any expectation that you have, we guarantee we will handle the matter fairly and properly. If you are not satisfied with the way that we have dealt with your concern, you may contact whistleblowing@experian.com - this email address is monitored by a limited number of Internal Audit staff and should be used to raise any concerns you have about the Whistleblowing process or the way your concern has been handled. It should not be used as a substitute for the Confidential Helpline.

Unless new and material information is presented, there is no obligation to reopen the matter once it has been investigated and closed.

2.1.4.1.2. Whistleblowing Register

Any disclosures of Reportable Conduct will be securely retained in a 'Whistleblowing Register' within Navex's confidential online portal and such register will be overseen by the Regional Head of Internal Audit and such other person authorised by the Regional Head of Internal Audit.

2.1.4.2. Protection and Support for Whistleblowers

An Eligible Whistleblower can have access to the following Whistleblower protections under the Acts if they make a protected disclosure which meets the following criteria:

- the Whistleblower is an Eligible Whistleblower (as defined in the Acts);
- the disclosure is made directly to an Eligible Recipient;
- the information disclosed relates to Reportable Conduct (as defined in the Acts); and
- the Whistleblower has reasonable grounds for their suspicions.

The Eligible Whistleblower's disclosure may be anonymous and still be protected under the Acts. The Eligible Whistleblower may also be able to make a public interest or emergency disclosure to a journalist or parliamentarian in accordance with the Relevant Acts in limited circumstances which are summarised above.

A disclosure which does not relate to Reportable Conduct will not qualify for protection under the Corporations Act or, in relation to Experian's tax affairs, the Taxation Administration Act ("the Acts"). However, a disclosure made to a legal practitioner for the purposes of obtaining legal advice will always be protected under the Acts.

2.1.4.2.1. No Detriment

It is important to Experian that individuals who make a disclosure under this Policy do not suffer detriment or adverse treatment as a result of their disclosure. Detriment or adverse treatment may include actual or threatened:

- dismissal, demotion, suspension, alteration of an employee's position/duties or injury to an employee in his or her employment;
- unfair treatment between an employee and other employees of Experian;
- damage to property, reputation or financial position;
- harassment, intimidation, harm or injury including psychological harm;
- any other damage to a person

Experian does not tolerate any form of unfair treatment, threat, retaliation or other action against any individuals who have made or assisted in the making of a disclosure or involved in an investigation of a report under this Policy and will take steps to ensure that Whistleblowers do not suffer detriment as a result of their act of disclosure and reporting. Any unfair treatment, threat, retaliation or other action must immediately be reported to an Eligible Recipient, or a member of Experian's Human Resources Team, the Regional Head of Internal Audit, the Experian ANZ Chief Legal Officer or the Experian ANZ Chief Executive Officer. If the matter involves the Experian ANZ Chief Legal Officer

and/or Experian ANZ Chief Executive Officer, it should be reported to the Regional Head of Internal Audit, or another Board member to investigate and address.

Whistleblowers who report Reportable Conduct directly to an Eligible Recipient are entitled to certain protections under law, such as protection against the commencement of certain legal proceedings or actions in relation to the report. In addition, a Whistleblower who makes a report of Reportable Conduct under this Policy, may be entitled to additional protections under law. These protections ensure that eligible persons who make eligible disclosures are protected against civil, administrative and criminal liability, the enforcement of certain contractual remedies in respect of those disclosures and disclosure of Reportable Conduct not being admissible in evidence against the Whistleblower in criminal proceedings or proceedings for the imposition of a penalty (except in respect of disclosures of false information). Experian encourages Whistleblowers to seek their own independent legal advice.

Whistleblowers who have information which they suspect, on reasonable grounds, relates to Reportable Conduct and make a report of that information in accordance with this Policy will not be discriminated against or disadvantaged in their employment or engagement with Experian, even if the report is subsequently determined to be incorrect or not substantiated.

All reasonable steps will be taken by Experian to ensure that a Whistleblower will not be subject to any form of retribution, victimisation, discrimination, injury, harassment, demotion, dismissal or prejudice, because they have made a report. However, this Policy will not protect the Whistleblower if they are also involved in or connected to the Reportable Conduct.

Note, detrimental treatment is not:

- administrative action taken by Experian that is reasonable to protect a Whistleblower from detriment (for example, moving a Whistleblower to another work location); or
- reasonable management action regarding a Whistleblower's unsatisfactory work performance or conduct.

Whistleblowers are entitled to seek compensation and other remedies from Experian for loss, damage or injury they have suffered as a result of a Whistleblower disclosure or if Experian has failed to take reasonable precautions and has not exercised appropriate due diligence to prevent the loss, damage or injury from occurring.

A Whistleblower may also have rights to compensation for loss, damage or injury and other remedies under the Acts if the Whistleblower's identity has been disclosed or where the Whistleblower has been subject to detrimental treatment.

2.1.4.2.2. Confidentiality and Protection of Identity

Subject to compliance with legal requirements, upon receiving a report under this Policy, Eligible Recipients are legally prohibited from disclosing any particulars about the disclosure that might identify, or is likely to lead to the identification of, the individual reporting the conduct, without first obtaining the relevant individual's express consent. However, the Eligible Recipient is able to disclose the complaint without the discloser's consent to ASIC, APRA or the Australian Federal Police, the Commissioner of Taxation or to an Australian legal practitioner for the purposes of Experian:

- obtaining legal advice or representation;
- a court or tribunal finds it is necessary in the interests of justice, or;
- otherwise as permitted by law.

It may also be necessary to disclose information (other than the Whistleblower's identity) that is reasonably necessary for the purposes of investigating the Reportable Conduct, in which case Experian will take all reasonable steps to reduce the risk of the Whistleblower being identified.

Steps that Experian may take to protect the confidentiality of the Whistleblower's identity include:

- redacting personal information in the report and related documentation;
- referring to the Whistleblower in a gender-neutral way;
- reviewing the Whistleblower's disclosure to ascertain and redact aspects of the disclosure that may inadvertently identify the Whistleblower;
- keeping documents relating to the Whistleblower's report secure and limiting access;
- reminding persons involved of the confidentiality requirements under the Acts.

Whistleblowers must also take their own steps to protect the confidentiality of their identity both prior to and after making a disclosure.

2.1.4.2.3. Support for Whistleblowers

Experian is committed to supporting Whistleblowers who wish to make a report of Reportable Conduct under this Policy. If a Whistleblower chooses to make a report under this Policy in person, they are entitled to do so with a support person present. Experian will take all reasonable steps to ensure that Whistleblowers who make a report of Reportable Conduct receive appropriate support and engagement.

Experian provides support to Whistleblowers, which includes the following:

- where possible, keeping the Whistleblower informed of the progress and outcomes of the enquiry or investigation (subject to any privacy and confidentiality obligations and as required by law) including any proposed remedial actions;
- keeping the Whistleblower's identity confidential and/or anonymous, if requested by the Whistleblower to do so;
- endeavouring to resolve any concerns that the Whistleblower has regarding actual or threatened detrimental treatment because the Whistleblower has made, or is considering making, a report under this Policy;
- providing training (and re-training as required) to employees, managers and officers about this Policy;
- providing free access to a confidential support and counselling service through Experian's Employee Assistance Program.

Additional support for Whistleblowers is available via:

- Experian's Employee Assistance Program;
- the Experian ANZ Human Resources Team which may include appointing an independent support person;
- independent support service providers such as Lifeline and Beyond Blue.

The Discloser should understand that use of these support services may require the Discloser to consent to the disclosure of their identity or provide information that may lead to the discovery of their identity.

2.1.4.3. False or frivolous reports

A report may have serious consequences, including potential damage to the career prospects and reputation of the person who is the subject of any allegations of Reportable Conduct. Therefore, it is very important that Whistleblowers who make a report under this Policy do so with reasonable grounds to suspect that the Reportable Conduct has, or will shortly, take place.

Experian takes reports made under this Policy very seriously – it is important to note that the protections afforded a Whistleblower do not apply where a report is made falsely, is misleading or is frivolous without having reasonable grounds to suspect that the Reportable Conduct has, or will shortly, take place. Disciplinary action may be taken against any employee who makes a false or frivolous report under this Policy without having reasonable grounds to do so.

A Whistleblower will not be considered to have made a report with reasonable grounds to suspect that the Reportable Conduct has, or will shortly, take place, if the report is frivolous, raised for a malicious reason or ulterior motive, or if it is not based on facts and/or circumstances to substantiate a reasonable basis for the report. Repeated reports about trivial matters may also be considered frivolous.

2.1.4.4. Fair treatment of other persons

Experian will take all reasonable steps to provide any employee mentioned in a Whistleblower's report with an opportunity to respond to the allegations as part of any Whistleblower inquiry or investigation.

Employees who are mentioned in any Whistleblower report will also be entitled to access the Employee Assistance Program.

2.1.5. Record Keeping

All records relating to Whistleblowing Incidents are stored securely with Navex Global and can only be accessed by Global Internal Audit personnel.

2.1.6. Regulatory Requirements

This Policy will be updated as regulatory requirements change.

3. Communication

3.1. Reporting

An overview of the output from the Confidential Helpline is reported to the Enterprise Risk Management Committee (ERMC) and Experian PLC Audit Committee so that they can assess the thematic trends of cases reported.

3.2. Training

Reference to this Policy will be included in mandatory regulatory training for all Experian ANZ employees.

3.3. Policy Communication

This Policy is publicly available on Experian's website under the Legal section.

This Policy will be communicated as part of the corporate induction process and will be available to all staff on Experian's intranet. The senior leadership team of each business unit is responsible for communicating the requirements of this Policy to its employees, and particularly those employees likely to be engaged in interactions with Regulators and/or Government Departments.