

Whistleblower Policy and Procedure

Symal Group Limited

Date of adoption: 19/02/2026

1. Purpose as scope

Symal strives to operate with a culture of ethical and appropriate corporate behaviour in all our business activities. This includes ensuring that Symal acts with integrity, honestly and in accordance with good governance principles.

This purpose is supported by:

- ensuring that Symal has sound procedures to allow all workers and their families to identify and report genuine concerns about illegal conduct or any improper state of affairs pertaining to Symal, without fear of reprisals, and
- ensuring all Employees and officers of Symal are aware of the protections available under this Whistleblower Policy and Procedure (**Policy**) and Whistleblower Laws.

2. Definitions

'**APRA**' means the Australian Prudential Regulation Authority.

'**ASIC**' means the Australian Securities and Investments Commission.

'**ATO**' means the Australian Taxation Office.

'**Board**' means the Board of Directors of Symal Group Limited.

'**Bribe**' has the same meaning as given by Symal Group Limited's Anti-Bribery and Corruption Policy as amended from time to time.

'**Eligible Recipient**' is defined in section 8.1.

'**Emergency Disclosure**' is defined in section 8.8.

'**Employee(s)**' means a full time, part time, casual or volunteer employee of Symal and includes contractors and agents of Symal.

'**Discloser(s)**' refers to the persons eligible to make a disclosure protected by Whistleblower Laws which are:

- (a) Symal Employees and officers as well as their relatives and dependants;
- (b) suppliers of goods or services to Symal;

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- (c) employees of suppliers of goods or services to Symal; and
- (d) Symal (and their directors/secretaries).

'Protected Matters' refers to the types of matters outlined in section 7.1, which are protected by Whistleblower Laws and the terms of this policy.

'Public Interest Disclosure' is defined in section 8.7.

'Senior Manager' means a person who:

- makes, or participates in making, decisions that affect the whole, or a substantial part, of the business of Symal; or
- has the capacity to significantly affect Symal financial standing.

'Symal' means Symal Group Limited and all its subsidiaries.

'Whistleblower Laws' refers to the protections contained in Part 9.4AAA of the Corporations Act 2001, Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 and Taxation Administration Act 1953.

Whistleblowing Officer means Speak Up Integrity Hotline.

Whistleblowing Investigation Officer means the Audit and Risk Committee (excluding any person who has an interest in the Protected Matter).

3. Responsibilities

Under this Policy, the following Departments have the following responsibilities:

Action	Responsible party
Investigate Protected Matters	Whistleblowing Investigation Officer
Reviewing this Policy	General Counsel
Approving amendments to this Policy	Chairperson of the Audit and Risk Committee

4. Regulatory Requirements

- Corporations Act 2001
- ASIC Act
- Superannuation Industry (Supervision) Act 1993
- Banking Act 1959.

5. Application

This Policy applies to Symal and reflects the requirements under Whistleblower Laws. This Policy applies to and protects all Disclosers.

Symal encourages Disclosers to speak up and report any wrongdoings covered by this Policy.

6. Types of Disclosures Protected by Whistleblower Laws

A disclosure is protected by Whistleblower Laws if:

- the disclosure relates to Protected Matters;
- the information is disclosed by a Discloser; and
- the disclosure is made to one of the persons identified below under section 8 or to a journalist or parliamentarian as a Public Interest Disclosure (as defined in section 8.7) or Emergency Disclosure (as defined in section 8.8) .

All the above 3 conditions must be satisfied for a disclosure to be protected by Whistleblower Laws.

7. What Matters are Disclosable

7.1 Protected Matters

The types of disclosures which are protected are those where the Discloser has reasonable grounds to suspect that the information disclosed concerns misconduct, or an improper state of affairs or circumstances in relation to Symal.

Without limitation, Protected Matters can involve information that a Discloser has reasonable grounds to suspect indicates that Symal, Employees or officers of Symal, have engaged in conduct that:

- (a) constitutes a contravention of the Corporations Act 2001, the ASIC Act, the Superannuation Industry (Supervision) Act 1993, the Banking Act 1959 or any insurance or life insurance statutes;
- (b) constitutes an offence against a law of the Commonwealth which is punishable by imprisonment for 12 months or more;
- (c) represents a danger to the public or the financial system; or
- (d) is prescribed by regulation.

Protected Matters include matters that may not necessarily involve unlawful conduct or contravention of a particular law. Common examples of Protected Matters include actual or suspected conduct that:

- (a) constitutes offering or accepting a Bribe;
- (b) constitutes illegal conduct, such as use of illicit drugs, and criminal damage against property;
- (c) is a failure to comply with, or breach of, legal or regulatory requirements;
- (d) is a breach of any applicable industry practices; and
- (e) is an unsafe work practice, or contributes to an unsafe workplace.

7.2 Non-Protected Matters

The disclosure of information related to a personal work-related grievance is not generally protected by Whistleblower Laws. A personal work-related grievance relates to information where:

- (a) the information concerns a grievance in relation to the Discloser's employment or former employment which has implications for the Discloser personally;
- (b) the information does not have significant implications for Symal that do not relate to the Discloser; and

- (c) the information does not concern conduct or alleged conduct referred to in the Protected Matters in section 7.1 above.

Examples of personal work-related grievances include interpersonal conflicts between the Discloser and other Employees, decisions regarding engaging, transferring or promoting a Discloser and decisions to discipline a Discloser or suspend or terminate the engagement of a Discloser.

Employees wishing to report personal work-related grievances are encouraged to raise their concerns to their supervisor or manager or the human resources department. Complaints or reports will be investigated in accordance with Symal's policies and procedures.

Personal work-related grievances may be protected under this Policy if the grievance includes any information as specified within the Protected Matters of this Policy or where Employees suffer from or are threatened with retaliation or harassment for making a report of Protected Matters.

8. Who Can A Protected Matter Be Disclosed To?

8.1 Eligible Recipient

A Discloser may make a report concerning a Protected Matter to an **Eligible Recipient** who includes:

- (a) an officer or Senior Manager of Symal;
- (b) an actuary of Symal;
- (c) an auditor or member of an audit team conducting an audit on Symal;
- (d) a person authorised by Symal to receive reports of Protected Matters that qualify for protection under this Policy, such as the Whistleblowing Officer; or
- (e) any other person or body outlined in this section 8.

8.2 Whistleblowing Officer

Symal has appointed a Whistleblowing Officer who is appropriately trained and qualified to receive and handle reports of Protected Matters and to safeguard the interests of Disclosers.

The Whistleblowing Officer is responsible for protecting a Discloser's rights under this Policy and ensuring that each report of Protected Matters complies with Whistleblower Laws.

Disclosers may contact the Whistleblowing Officer to seek accurate and confidential information and advice in relation to this Policy including information about how to make a report of Protected Matters.

The contact details of the Whistleblowing Officer are as follows:

Weblink:

<https://ispeakup.co/symalgroup>

QR Code:



Phone:

1800 498 853

Email:

symalgroupspeakup@coreintegrity.com.au

Address:

PO Box 730, Milsons Point NSW 1565

8.3 Legal Practitioner

A Discloser may make a report concerning a Protected Matter to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of Whistleblower Laws.

8.4 Tax Agent or BAS Agent

A Discloser may make a report concerning a Protected Matter to a registered tax agent or BAS agent who provides tax agent or BAS services to Symal, or any other officer of Symal who has duties that relate to tax affairs.

8.5 Regulatory Bodies

A Discloser may also report Protected Matters directly to an external regulator such as ASIC, APRA, the ATO or any other Commonwealth regulatory body and qualify for protection under Whistleblower Laws.

8.6 Disclosures to Politicians and Journalists

A disclosure of a Protected Matter to a journalist or member of State or Federal Parliament will be protected by Whistleblower Laws only if it qualifies as a Public Interest Disclosure (as defined in section 8.7) or an Emergency Disclosure (as defined in section 8.8)..

8.7 Public Interest Disclosure

A Public Interest Disclosure is a disclosure of Protected Matters to a member of State or Federal Parliament or journalist which will be protected by Whistleblower Laws if all the following requirements are satisfied:

- (a) the Discloser has previously made a disclosure of the information pursuant to this Policy;
- (b) at least 90 days have passed since the previous disclosure was made;
- (c) the Discloser does not have reasonable grounds to believe that action is being or has been taken to address the previous disclosure;
- (d) the Discloser has reasonable grounds to believe that making a further disclosure of the information to a member of Parliament or journalist would be in the public interest;

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- (e) the Discloser has given Symal written notification that identifies the previous disclosure and states that the discloser intends to make a public interest disclosure; and
- (f) the extent of information disclosed is no greater than is necessary to inform the journalist or member of Parliament of the relevant misconduct or improper state of affairs.

If a Discloser is unsure whether the Public Interest Disclosure provisions described above apply to their report of Protected Matters, they are encouraged to contact the Whistleblowing Officer or seek external legal advice.

8.8 Emergency Disclosure

An **Emergency Disclosure** is a disclosure of Protected Matters to a journalist or member of State or Federal Parliament which will be protected by Whistleblower Laws if all the following requirements are satisfied:

- (a) the Discloser has previously made a disclosure of the information pursuant to this Policy;
- (b) the Discloser has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment;
- (c) the Discloser has given Symal written notification that identifies the previous disclosure and states that the Discloser intends to make an emergency disclosure; and
- (d) the extent of information disclosed is no greater than is necessary to inform the journalist or member of Parliament of the substantial and imminent danger.

9. Protections for Disclosers

9.1 Confidentiality

There is no requirement for a Discloser to identify themselves to be protected by Whistleblower Laws. That is, protected disclosures may be made anonymously.

Where a disclosure is protected by Whistleblower Laws, the Laws prohibit persons from disclosing the identity of a Discloser or disclosing information that is likely to lead to the identification of the Discloser.

Persons may only disclose the identity of a Discloser with the Discloser's consent or to ASIC, APRA, the AFP or a legal practitioner for the purposes of obtaining legal advice about the Whistleblower Laws.

Persons may also disclose the existence of the Protected Matters (without disclosing the identity of the Discloser) to the extent necessary for the matters to be investigated, provided all reasonable steps are taken to reduce the risk that the Discloser's identity can be discovered. These disclosures may include disclosures to:

- the Managing Director, the Directors, Head of Finance, Commercial and Legal Manager and Operations Manager;
- delegates to HR or other managers to make inquiries or to conduct investigations or order external investigations as is deemed appropriate; and

- respondents to complaints to ensure that the person/s against whom allegations are made are given the opportunity to respond to any allegations.

All information relating to a disclosure will be stored securely with restricted access controls. Symal will take all reasonable steps to reduce the risk that a Discloser will be identified during an investigation, including redaction of identifying information and the use of neutral descriptors where possible.

9.2 Immunity and No Victimisation For Discloser

If a Discloser makes a disclosure protected by Whistleblower Laws, the Discloser cannot be subject to any civil or criminal liability for making the disclosure and cannot be subject to any contractual breach or other civil claim on the basis of the disclosure.

In line with Whistleblower Laws, Symal prohibits any person or company from:

- (a) engaging in any conduct that causes detriment to any person because that person (or another person) made a disclosure about a Protected Matter pursuant to Whistleblower Laws; or
- (b) carrying out any threats to cause detriment to any person (whether express or implied threats) because that person (or another person) made a disclosure about a Protected Matter pursuant to Whistleblower Laws.

10. Reporting Protected Matters

- (a) All disclosures will be taken seriously and will be thoroughly investigated by Symal.
- (b) To be protected by this Policy, Disclosers must make a report of Protected Matters directly to an Eligible Recipient.
- (c) Employees may disclose Protected Matters by either of the following steps:
 - (i) submit a written complaint or report and any relevant documentation on any Protected Matters to the Discloser's relevant manager or Symal contact (any correspondence should be marked "**Strictly confidential – to be opened by the addressee only**"). The manager or contact will report the concerns to the Whistleblowing Officer (unless the subject matter relates to the Whistleblowing Officer, in which case the matter will be referred to the Audit and Risk Committee); and
 - (ii) if a Discloser has a concern with step 1 (for example the Discloser reasonably believes that the manager is involved in the Protected Matters or the Discloser does not feel comfortable reporting it to their manager for any other reason), then the Discloser may submit a report directly to the Whistleblowing Officer Reporting Channels as set in 8.2 above or any of the other Eligible Recipients.
- (d) The report should include a full disclosure of the relevant details of the conduct and, wherever possible, provide the reasons for their concerns and all supporting documentation, if available.
- (e) Disclosers may elect to remain anonymous by employing any of the options listed below or by creating an anonymous email address from which to send their report of the Protected Matters. In making an anonymous report of Protected Matters, the Discloser will still be protected under Whistleblower Laws.
- (f) All information provided to the Whistleblowing Officer will be kept confidential and will only be disclosed in accordance with this Policy or as required by law.

- (g) The Whistleblowing Officer will ensure that all telephone calls are conducted in private and that all emails are kept confidential. Disclosers wishing to meet with the Whistleblowing Officer away from the workplace should contact the Whistleblowing Officer directly to arrange a meeting (this could be outside of business hours).
- (h) If Disclosers believe it is necessary to do so, they may also report Protected Matters directly to an external regulator such as ASIC, APRA, the ATO or any other Commonwealth regulatory body and qualify for protection under Whistleblower Laws.
- (i) For the avoidance of doubt, a Discloser can still qualify for protection under Whistleblower Laws even if their report of Protected Matters turns out to be incorrect.
- (j) If a Discloser has made a report of Protected Matters which is deliberately false, or is trivial or without substance, the Discloser's conduct will be considered a serious breach of this Policy.
- (k) A report will be deliberately false if the Discloser has made the report with the knowledge that the contents of their report is false, or with reckless disregard as to the truth or falsity of the contents of their report.
- (l) To ensure that Symal adheres to the principles of good corporate governance. The Audit, Risk and Compliance Committee (ARCC) has primary oversight responsibility for the Company's whistleblower framework.
The Whistleblowing Officer will provide the ARCC with a summary report of all disclosures received, including the number, nature, status and outcomes of investigations (on a de-identified basis where appropriate).
Any matter involving allegations of serious misconduct, or material financial, legal or reputational risk will be escalated promptly to the Chair of the ARCC and, where appropriate, to the full Board.
The Board is required to comply with all sections of this Policy and Whistleblower Laws.
- (m) To ensure fairness and to avoid possible risk to the objectivity of the investigation, Disclosers should not discuss their report and should keep confidential the fact that they have made a report of Protected Matters against Symal.

11. Handling and Investigating Protected Matters

11.1 Receiving Reports of Protected Matters

Symal will refer Protected Matters to its Whistleblowing Investigation Officer for investigation to determine whether misconduct or some other improper state of affairs exists.

Upon receiving a report of Protected Matters, the Whistleblowing Investigation Officer will assess the disclosure to determine whether:

- (a) it qualifies for protection under Whistleblower Laws; and
- (b) whether a formal investigation is required.

11.2 Conducting an Investigation into Protected Matters

The Whistleblowing Investigation Officer will investigate the relevant matters in a manner compliant with the confidentiality obligations outlined herein. The objective of a formal investigation is to locate evidence that either substantiates or disproves the claims made in a report of Protected Matters.

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In conducting a formal investigation, the Whistleblowing Investigation Officer will:

- (a) document and investigate reports of Protected Matters as soon as practicable after the report is lodged;
- (b) review all supporting documentation and obtain further information as required to appropriately and fully investigate the report;
- (c) consider any possible remedy or action that may be required; and
- (d) immediately notify the Board if the report of Protected Matters concerns allegations of serious misconduct.

The Whistleblowing Investigating Officer may alternatively:

- appoint an appropriately qualified and impartial person or entity to investigate the relevant matters; or
- refer Protected Matters directly to ASIC, APRA or the Australian Federal Police.

11.3 Keeping a Discloser Informed

- (a) The Whistleblowing Officer and the Whistleblowing Investigating Officer will also maintain appropriate records and documentation for each stage of the investigation process.
- (b) Depending on the nature and scope of the allegations made in the report of Protected Matters, the Whistleblowing Investigating Officer will advise the Discloser within 20 business days of them making the report whether an investigation into the Protected Matters has been undertaken and the start date of the investigation, whether the investigation has been completed and any action that is to be taken to address the Protected Matters, subject to any applicable confidentiality or privacy requirements or other relevant considerations.
- (c) If the investigation is ongoing, the Whistleblowing Investigating Officer will regularly update the Discloser on the progress of the investigation until the investigation is finalised

11.4 Investigation Findings

- (a) Once an investigation is completed, the Whistleblowing Investigating Officer will report the findings of the investigation (**Investigation Report**).
- (b) Where the matter involves an allegation of a serious misconduct, a copy of the Investigation Report will be provided to the Symal's Board to assist in updating and amending the risk management and compliance frameworks.
- (c) If the Whistleblowing Investigating Officer is satisfied that the Protected Matters have occurred, they will make a recommendation to the Board as to the action that should be taken.
- (d) If the Whistleblowing Investigating Officer is not satisfied that the Protected Matters have occurred, they will provide a report of the findings of the investigation to the Board including a summary of the reasons why they are not satisfied that the Protected Matters have occurred.
- (e) Where appropriate, the Whistleblowing Investigating Officer will communicate a summary of the findings of the investigation to the Discloser.

12. Supporting Whistleblowers, Providing Fair Treatment and Protection from Detriment

Symal intends to support Disclosers making disclosures about Protected Matters and to put in place procedures to promote fair treatment of Disclosers and protect them from detriment. This can be achieved by:

- providing access to EAP counselling services to all Disclosers;
- investigating all complaints in accordance with the procedures outlined in this Policy;
- implementing investigation processes which are procedurally fair to both Disclosers and respondents to allegations;
- in circumstances where a Discloser consents, having an appropriate Senior Manager or human resources officer monitor the Discloser's treatment in the workplace for relevant periods to ensure no victimisation takes place;
- communicating this Policy to Symal Employees and officers; and
- taking appropriate disciplinary action against any Employees or contractors that breach the victimisation or confidentiality provisions of the Whistleblower Laws.

12.1 Risk Assessment and Protection Measures

Upon receipt of a disclosure, Symal will conduct a risk assessment to identify the risk of detriment to the Discloser and implement appropriate protection measures. Such measures may include limiting access to information, separating investigation personnel from operational reporting lines, monitoring workplace treatment, implementing temporary reporting line changes, and providing access to independent support services.

13. Accessibility

- (a) Employees will be made aware of the existence of this Policy and the mechanisms for reporting Protected Matters through staff briefing sessions and team meetings, Symal's induction packages, employee handbooks and new-starter training programs, staff noticeboards and also via Symal's website (which may be accessed here symal.com.au) as well as its staff intranet webpage.
- (b) Symal will also provide ongoing education and training programs for all Employees in relation to this Policy and its processes and procedures to ensure company-wide knowledge and understanding of all rights and obligations under this Policy.
- (c) All Eligible Recipients will be provided with training and resources to ensure consistency and company-wide knowledge and understanding of the processes and procedures for responding to reports of Protected Matters under this Policy.

This Policy is published on the Company's website in accordance with ASX Corporate Governance Recommendation 3.3 and forms part of the Company's corporate governance framework.

14. Enforcement

Employees must comply with the requirements of this Policy. Any breach of this Policy may result in disciplinary action up to, and including, termination of employment.

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15. Document Review

Symal's General Counsel is responsible for the oversight and monitoring of this Policy and will review this Policy on a regular basis at least every 2 years.

This Policy may only be amended with approval by the Chairperson of the Audit and Risk Committee.