

Whistleblower Policy

This Policy applies to Talentia and all subsidiaries

Effective date	01.09.2026	Next review date	01.09.2027
----------------	------------	------------------	------------

Purpose

Talentia encourages people to speak up about serious wrongdoing and provides a safe and appropriate way to make a protected disclosure. We will handle disclosures fairly, sensitively and in accordance with the Protected Disclosures (Protection of Whistleblowers) Act 2022.

Our Approach

- We take concerns about serious wrongdoing seriously.
- We will handle disclosures sensitively and protect confidentiality as far as reasonably possible and required by law.
- We will not tolerate retaliation or victimisation because someone has made a protected disclosure or supported an investigation.
- We will assess disclosures promptly and take appropriate action.

Who can make a disclosure

A protected disclosure may be made by a current or former employee, contractor or other person covered by the Protected Disclosures (Protection of Whistleblowers) Act 2022 who has reasonable grounds to believe that serious wrongdoing has occurred in or by Talentia.

What can be reported

Serious wrongdoing can include matters such as:

- criminal or other unlawful conduct;
- serious risks to health, safety or the environment;
- corrupt or improper conduct;
- gross negligence or gross mismanagement; or
- other serious wrongdoing covered by the Act.

Ordinary workplace concerns, interpersonal issues or employment matters that do not involve serious wrongdoing should normally be raised through Talentia's Complaints Procedure or another appropriate Talentia process.

How to make a disclosure

A disclosure can be made to the CEO, a member of the Senior Management Team, or another appropriate senior Talentia person. If you are unsure who to contact, you can raise the concern with another Talentia manager who can direct it to the appropriate person.

A disclosure may also be made directly to an appropriate external authority, including the Ombudsman, where permitted by the Act.

Anonymous Disclosures

You may make a disclosure anonymously. Talentia will consider the information provided, although anonymity may limit our ability to investigate the matter or provide updates. If you provide your identity, Talentia will protect it as required by law and will only share identifying information where permitted or required.

What happens when a disclosure is received

Talentia will, as appropriate:

- acknowledge receipt where contact details are available;
- consider whether the disclosure warrants investigation;
- assess whether the matter should be investigated, addressed, referred or otherwise dealt with;
- keep the discloser appropriately informed where possible; and
- take appropriate action based on the circumstances and information available.

The Protected Disclosures (Protection of Whistleblowers) Act 2022 provides guidance that these steps should generally be taken within 20 working days. Where this is not practicable, Talentia will provide an expected timeframe and appropriate updates.

Protection and confidentiality

Talentia will take reasonable steps to protect the identity of a discloser and will not retaliate against or victimise a person for making a protected disclosure or participating in an investigation. Information will be shared only with people who need it to manage or investigate the matter, or where disclosure is permitted or required by law.

Support

People involved in a protected disclosure or investigation may seek appropriate support, including through Talentia's Employee Assistance Programme where available.

What we expect from our people

- Raise genuine concerns honestly and in good faith.
- Provide relevant information where possible.
- Cooperate with reasonable enquiries or investigations.
- Maintain confidentiality and respect the people involved.

Review

This policy will be reviewed annually, or earlier if required to reflect changes in legislation, Talentia's business needs or our practices.